



London Borough of Wandsworth

Local Plan Publication (Regulation 19) Version / Public Consultation (10 January to 28 February 2022)

Schedule of Representations and the Council's Responses / Organised in Comment Order

13.09.22

Background

The following is a schedule of representations that were submitted as part of the public consultation that the Council held on Local Plan Publication (Regulation 19) Version from 10 January to 28 February 2022, as well as the Council's response. These comments have been prepared at the request of the Planning Inspectors to assist them in their examination of the Local Plan.

Please note: Where the Council has suggested a 'Proposed Change' as part of their response, this is provided only for the benefit of the Planning Inspectors in assisting their understanding of the Council's response. As the Local Plan has already been submitted for examination, the Council does not have the power to make changes to the Local Plan; it can only be recommended by the Planning Inspectors to do so as Main Modifications should they consider it to be an issue of soundness or legal compliance in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004.

How to use this document

Representations are organised within the schedule by the Representor. The section of the Local Plan to which they refer is set out under the heading 'Title'. Where this was not clearly specified within the representation, officers at Wandsworth have selected an appropriate reference point. To assist in ensuring that the Council's comments are relevant, some representations have been divided into distinct 'comments'. Each such comment has a unique ID associated with it (set out under the heading 'ID'). The representations can also be found in full as they were submitted to the Council on the Council's website: <https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/local-plan/draft-local-plan-publication-consultation-responses/>

Where changes have been proposed by the Council as a result of the representations made (set out under the heading 'Proposed Change', *noting that caveat above that the Council does not have the authority to make these changes*), they take the format that proposed additions to the text are recorded in italicised and underlined text, and proposed deletions are recorded with a strikethrough.

For example: 'This text is to be retained and this text is to be added but ~~this text is to be deleted.~~'

A number of the proposed changes relate to maps. Appendix 1 is provided to help demonstrate where changes to maps will be made.

Reg 19 Consultation Responses

Consultee Full Name	Mr William Butterworth
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	2
Title	Paragraph
Number	2.90
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	As a local resident of Battersea, I would like to register my full support for the building of the Diamond Jubilee Foot and cycle bridge. I am one of many Londoners who is limiting my use of cars and motor transport in favour of more environmentally friendly cycling. This bridge would mean more cycle journeys for me each week. I could not be more enthusiastic in my support of the scheme.
Change(s) considered necessary	n/a
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Sachin
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	

Comment ID	3
Title	Paragraph
Number	4.102
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	The intensification of residential use all around the waste transfer station on Smugglers Way, makes the long term location of the waste station here unfeasible due to the pollution created (primarily smell, but also dust and noise). This site should be changed to a less polluting employment wharf use with residential above.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The allocation for this site allows for the potential comprehensive redevelopment which would need to account for the the environmental amenity policies set within the Plan in the determination of a planning application.
Proposed Change	No change considered necessary.
Consultee Full Name	Dan
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	6
Title	Paragraph
Number	8.10
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	No

Details of reason(s) for representation	The Council's vision for Tooting bases itself around reducing the dominance of motor vehicles and yet the actions of fellow Council members alienate those who want to engage in active travel via cycling or by walking. This is evident by Councillors from Nightingale Ward lobbying Transport for London in removing key parts of infrastructure on Cycle Superhighway 7.
Change(s) considered necessary	Wandsworth Council should commit themselves to improving Cycle Superhighway 7 albeit at the inconvenience to motorists. They say that they want to reduce vehicle dominance, so they should not be consistently swayed by the motoring industry.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	I am an avid cyclist and cycle to my job as a student nurse and to university and so would like to be involved as much as possible.
Council Response	PM6 Tooting (C) People First 2 sets out that the Council will support improvements to Cycle Superhighway 7 on the A24 corridor, the planned cycle lane on Garrett Lane to Wandsworth Town, and other local cycle lanes which do not adversely affect local businesses will be supported. The Council also recognises that motor vehicles are necessary for several uses in the borough but are still aiming to meet its mode share target for 82% per cent of trips to be made by public transport and active travel or reduce the need to travel by 2041.
Proposed Change	No change considered necessary.

Consultee Full Name	Chris Medland
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	7
Title	Paragraph
Number	2.90
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>I would like to thank you for including the Cremorne / Diamond Jubilee Bridge within the second draft plan and for the statement of intent to complete it within the 15 year plan as described in section 2.9. I am aware of the work that has gone on regarding the search for avenues of funding with TfL, central government and others. The stars have not yet aligned but I have great faith that they will, in time, and that this project is destined to be completed successfully.</p> <p>This new Bridge that will connect the inner London communities and businesses of Battersea and Fulham represents high value for money(*1). It is sustainable infrastructure that will bring air quality and health benefits and boost the local economy. It will connect schools to their pupils, businesses to customers and a railway station and other transport links to a greater catchment of users. This true sustainable infrastructure project will have over 1.4 million users per annum (*1), has been subject of a TfL audit (*2) and since included in TfL's Transport Plan for London. It is in The bridge forms part of adopted policy by Hammersmith & Fulham and Wandsworth Councils and the bridge is supported by the GLA (*3). It will help air quality by shifting modes of transport from cars and busses. It will ease congestion on local busses. It will help reduce overcrowding at Clapham Junction. It will encourage more walking and cycling on local and commuter and business journeys. It will save time on local and commuter journeys and It will improve connectivity between existing public transport nodes by bus, rail and river.</p> <p>*1 -The 2012 SKM Colin Buchanan was commissioned by Wandsworth Council. It concluded that the bridge represented high value for money.</p> <p>*2-TfL Audit/Review 2016: TfL appointed Mott MacDonald to carry out a review/cost comparison of the scheme in 2016 which was submitted to the Mayor of London who has since included the crossing in the TfL Transport Plan 2017.</p> <p>*3 –The GLA motion of support can be found here: https://www.london.gov.uk/press-releases/assembly/assembly-push-for-diamond-jubilee-bridge</p> <p><u>Planning & Business Case</u></p> <ul style="list-style-type: none"> • 1924, Viscount Curzon MP calls formally for a bridge for pedestrian access situated between Wandsworth Bridge and Battersea Bridge • A bridge, adjacent to the Cremorne rail bridge, is called for in 2009 in the Transport Committee's review into the delivery of improvements to the orbital rail network which calls for it to link Battersea to the Overground network at Imperial wharf (rather than a new station in Battersea). • The first Business case was produced by consultants appointed by the two borough councils in 2003; it was then updated in 2012 and the proposal was shown to have Benefit/Cost Ratio of 2.0:1, representing high value for money. The site is selected and established by both councils in these documents. • The bridge is adopted policy in both Hammersmith & Fulham and Wandsworth • The bridge is part of the London Plan and is specifically called for in the Thames Strategy Policy Recommendation M7. • Hammersmith and Fulham's South Fulham Riverside SPD calls for the delivery of the bridge • Wandsworth councils Riverside SPD calls for the bridge and makes provision for funding contributions through CIL payments. • The Bridge is included in TfL's (Transport for London) Connecting the Capital Plan of December 2015

- The Bridge is included in TfL's transport plan for London, issued June 2017
- The GLA have agreed a cross party motion of support for the bridge
- The Bridge has planning consent and pre-commencement condition 13 has been discharged (pile design)
- TfL have completed their November 2016 cost analysis and business case which confirms its value for money and need.
- Piles have been installed and the bridge has now started on site so the consent is secured

Environmental Summary (as ascertained by Wandsworth Council's independent report)

- This true infrastructure project will have over 1.4 million users per annum initially (according to independent business case), with this number rising annually.
- It will help air quality by shifting modes of transport from cars and busses
- It will ease congestion on local busses
- It will reduce the overcrowding at Clapham Junction
- It will encourage more walking and cycling on local and commuter and business journeys
- It will save time on local and commuter journeys
- It will improve connectivity between existing public transport nodes by bus, rail and river
- We have undertaken a life cycle assessment of the embodied carbon within the proposed structure and energy in use calculations. We will be able to improve the embedded carbon through detail design and determine accurately the date after it opens that it becomes carbon negative, and the tonnage of carbon it will save each year going forward.

The Design

Responding to the navigational, riverbank and other site constraints (including the Battersea Heliport Take-off and landing zone) the bridges superstructure is of three-spans supported on four piers, two of which are in the river, aligning with the central two piers of the nearby Railway Bridge. This arrangement gives two longer, outer spans, and one shorter central span. The bridge spans by means of tied arches with the ties formed by the deck. Residual thrust from the arches, not carried by the ties, is resisted by the abutments and piers. The arches intersect in plan at the centre of each span, allowing the pairs of arches to provide some lateral stability to each other. Below the deck at the river piers, the arches change angle to run parallel to the span of the bridge. This minimises the lateral dimension of the new river piers.

This year will mark a decade since we submitted the planning application for Wandsworth and Hammersmith and Fulham's approval, we all knew then that this ambition would take years but had the belief to continue. I still believe. I thank you again for keeping the project alive. We will continue to seek financial backers that with your approval may be appropriate delivery partners to enable this public project to be even greater value for money.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Miriam Howitt
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	8
Title	Paragraph

Number	20.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>I can see no proposal for an extension from the Battersea Station of the Northern Line, which would benefit with stations at Clapham Junction (site adjacent North of Railway Station), Wandsworth Town (new development on B&Q or Homebase site), Putney Green Man bus terminal, Roehampton Centre. This is desperately needed to serve a recently hugely developed area of housing along Roehampton Lane, including a new 1000 student University. This has been called for inclusion on a Plan of Development up to 2038. People say it cannot be afforded, but the concept should be there and aimed for. It would be of great benefit now, when Wandsworth train station is so busy in normal times that commuters cannot even get onto the platform. When the developments taking place in the new centre of Wandsworth are complete, the increase in the population needing that service will be huge. It must be in the Plan now.</p> <p>I took a bus yesterday along the South Circular Road to East Putney Station on the District Line. It was so choked with private cars that it took 14 minutes from the time it was showing 3 minutes away. This was a Sunday, free of trade vehicles.</p> <p>Kind regards Miriam Howitt</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Local Plan does not propose to extend the Northern Line from Battersea Power Station to Clapham Junction as it has not been brought forward in the Infrastructure Delivery Plan or proposed by the Council at this stage. The Council is aware that from Wandsworth to Roehampton there are existing congestion issues and aims to address these through a variety of transport solutions including increasing access to public transport and encouraging the use of active travel. The removal of the Wandsworth Gyrotory is also expected to help ease traffic congestion.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mike Crippin
Consultee Organisation Details	Club Treasurer Wimbledon Park Rifle Club.
Agent Full Name	
Agent Organisation Details	
Comment ID	9
Title	Paragraph
Number	21.1

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Dear Sirs, I write in relation to the current open space designation of the Wimbledon Park Rifle Club behind 127 Granville Road, SW18 5SF as I believe the area currently shown as open space is incorrect. In the current adopted local plan the area designated as open space is as shown: I believe this is an error as the area of open space at our grassed range is significantly larger than the area currently identified. I have marked up a screenshot from google maps below for your information and would request the local plan is corrected accordingly. I trust this is acceptable but would be grateful if you could confirm the error has been rectified by return. Kind Regards, Mike Crippin
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The area referred to is from the 2007 Open Space Study which is now out of date. The Local Plan is supported by an Open Space Study from 2021 which has not captured this site as it does not meet the size requirements. The entirety of the site would be considered as open space even though it does not form part of the study or map 21.1.</p> <p>LP53 Protection and Enhancement of Green and Blue Infrastructure sets out that all open space is protected from inappropriate development which would apply to the site referenced.</p>
Proposed Change	No change is considered necessary.
Consultee Full Name	Miss Olivia Higgins
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	10
Title	Paragraph
Number	2.90
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Good afternoon Showing my support for the creation of the Diamond Jubilee bridge linking Battersea and Fulham. Many thanks, Olivia
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	William Murray
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	11
Title	Paragraph
Number	2.90
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Please accept this email as support and thanks for the work towards building The Cremorne/Diamond Jubilee Bridge
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Deb Roberts
Consultee Organisation Details	Planning & Development Manager – Planning & Development Team The Coal Authority
Agent Full Name	
Agent Organisation Details	
Comment ID	12
Title	Wandsworth Regulation 19 Local Plan
Number	

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Dear Planning Policy team</p> <p>Thank you for your email below regarding the Wandsworth's Local Plan (Publication Version) Consultations.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Wandsworth Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p> <p>Kind regards Deb Roberts (she / her)</p> <p>Deb Roberts <i>M.Sc. MRTPI</i></p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted
Proposed Change	No changes considered necessary.
Consultee Full Name	Chris Medland
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	13
Title	Paragraph
Number	2.90

Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	want to note support for inclusion of the diamond jubilee pedestrian bridge - alongside the cremorne railway bridge connecting battersea and fulham
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Ian Pollard
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	14
Title	Paragraph
Number	19.1
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Effective
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	

Change(s) considered necessary	<p>(i) Protected Core Frontages- does not currently include 360-374 and 376-408 Garratt Lane.</p> <p>Currently, only 521- 551 Garratt Lane is proposed designated as Protected Core Frontage. However Earlsfield is a two-sided local shopping street, 360- 408 Garratt Lane parades form an intrinsic part of the current shopping frontage, are 'prime' and should not be designated (as they currently have been) as 'Other Frontage', if the aim is to protect the most core and viable part of the existing retail frontages. Excluding these from a Protected Core designation has the potential to make Earlsfield's shopping area disjointed and hollowed-out, which would cause further loss of trade and therefore its impacting long term viability.</p> <p>As currently designated, this does not fully conform with the NPPF's requirement for Local Plans to "promote town centres' long term vitality and viability" based solely on the existing and historic retail hierarchy in Earlsfield.</p>
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. As noted in paragraph 19.20, all of the protected frontages in the Wandsworth are considered to be primary shopping areas in accordance with the NPPF and as key shopping areas for the purposes of the General Permitted Development Order. This affords all of the frontages a good level of protection in line with the ambitions of the NPPF's requirement to promote the long-term vitality and viability of town centres.</p> <p>That notwithstanding, it is agreed that 360-374 and 376-408 Garratt Lane should be reclassified as Secondary and Core Frontage, respectively, reflecting their more central (or 'prime pitch') location. The former, in part located opposite a 'T' road junction, has the feel of a lower order parade than the units from 376-408 Garratt Lane, which - as the representation notes - form part of a two-sided local shopping street. This distinction is reflected in the type of uses and occupiers, and supports its redesignation as Secondary Frontage.</p> <p>It is noted that there is an error in LP41.A.3, whereby the 'Mitcham Lane' Local Centre is erroneously referred to as 'Mitcham Road'. This should be corrected.</p>
Proposed Change	<p>In Appendix 3 Designated Frontages:</p> <p>Re-designate '360-374 Garratt Lane' as Secondary Frontage, rather than Other Frontage.</p> <p>Re-designate '376-408 Garratt Lane' as Core Frontage, rather than Other Frontage.</p> <p>Make associated changes to Map 19.1 Designated Centres and Frontages.</p> <p>See Appendix 1 for visualisation of mapping changes.</p> <p>Amend LP41.A.3 to refer to 'Mitcham Lane' rather than 'Mitcham Road'.</p>

Consultee Full Name	Mr Ian Pollard
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	15
Title	Paragraph
Number	23.1
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	
Change(s) considered necessary	(ii) Protected Secondary Frontages- 474-494 Garratt Lane and 573-593 Garratt Lane are proposed designated as Secondary Frontages. Locationally these two parades are situated opposite each other but slightly further from the station. These are of lesser importance than 360- 408 Garratt Lane described above, and it seems counter-intuitive to be designating a two-sided retail pitch here but not in Earlsfield's more prime pitch closer to the station entrance. These should not be higher in the designated hierarchy than 360- 408, if the objective is to maintain a viable retail area of continuous units.
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is agreed that amendments to the hierarchy of frontages in Earlsfield are appropriate, as reflected in the response to comment # 14. This proposes that 376-408 Garratt Lane is redesignated as 'Core Frontage' and 360-374 Garratt Lane as 'Secondary Frontage'. Those changes would afford a higher status to the two-sided parade between 521-551 / 376-408 Garratt Lane (Core Frontage) over that at 573-593 / 474-494 Garratt Lane (Secondary Frontage), addressing the incongruity identified in the representation. It is noted that the parade between 410-422 Garratt Lane is of a lower order (Other Frontage) than those further away from the station, however this feels appropriate given its location opposite St Andrew's Church and in the context of the uses and occupiers here.
Proposed Change	No change considered necessary as a result of this representation, however please see the Council's response to comment #14 for associated proposed changes.
Consultee Full Name	Mr Ian Pollard
Consultee Organisation Details	
Agent Full Name	

Agent Organisation Details	
Comment ID	16
Title	Paragraph
Number	14.26
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Effective
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	
Change(s) considered necessary	2/ Tall Buildings Policy - policy TB-C3-01 Earlsfield- Summerstown area. Proposed height: 7-10 storeys (21m- 30m). This is not consistent with the prevailing height of the Stadia residential scheme adjacent, which is predominantly ground + 7 upper floors on Summerstown frontage. It is also not consistent with Earlsfield generally being a low rise urban village, and not consistent with site opposite covered by mid rise policy MB-C3- 06 site, which is designated as mid rise 6 storeys. Strong consideration should be given to designating the site covered by the policy TB-C3-01 as a maximum of 7storeys.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. It is agreed that Southfields has a highly consistent and small scale built environment which has no capacity to accommodate tall buildings without causing harm to the overall character of the area. While the development pattern and ages is more mixed across Earlsfield, it remains small-scale in character with narrow residential streets and relatively small open spaces. However it is considered that the only tall building zone within this Place is at the borough boundary adjacent to a tall ongoing development in LB Merton. The shaded area of TB-C3-01 shows where the tallest elements may be appropriate subject to the further criteria of LP4.
Proposed Change	No changes considered necessary.
Consultee Full Name	Mrs Louise Cole
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	17

Title	LP55 Biodiversity
Number	Policy 66
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	
Change(s) considered necessary	<p><u>LP55 Biodiversity</u></p> <ol style="list-style-type: none"> 1 <i>The Council will protect and, where appropriate, secure the enhancement of the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites. This includes but is not limited to Special Areas of Conservation, Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites and Sites of Importance to Nature Conservation.</i> 2 <i>Development proposals will be required to protect and enhance biodiversity, through:</i> <ol style="list-style-type: none"> 1 <i>ensuring that it would not have an adverse effect on the borough's designated sites of habitat and species of importance (including buffer zones), as well as other existing species, wildlife, habitats and features of biodiversity value;</i> 2 <i>The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings and use of Sustainable Drainage Systems where appropriate. Developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements;</i> 3 <i>ensuring that new biodiversity features or habitats connect to the existing ecological and green and blue infrastructure networks and complement surrounding habitats;</i> 4 <i>enhancing wildlife corridors for the movement of species, including river, road and rail corridors, where opportunities arise; and</i> 5 <i>maximising the provision of ecologically functional habitats within soft landscaping.</i> 6 <i>Development which would have an impact on priority species or priority habitat(s) will only be permitted in exceptional circumstances where:</i> 7 <i>it has been demonstrated that there is no alternative site layout or site that would have a less harmful impacts; and</i> <ol style="list-style-type: none"> 2. <i>the impact has been adequately mitigated either through on or off-site measures</i> <p>I am contacting Wandsworth Council on behalf of Wimbledon Swifts, an informal local group with a special interest in promoting conservation for swifts in the Wimbledon and surrounding areas. The group belongs to a network of others across the UK who are working to publicise information on swift conservation. I have contributed to a number of Local Plan consultations, including Wandsworth's, to raise awareness of the potential during redevelopment for supporting the UK's fast dwindling, and officially endangered, swift population. At least one other London-based swift conservation advocate has also submitted comments on the proposed Wandsworth Local Plan.</p> <p>Swifts are exciting migrant birds who come here in the summer months from Africa in order to breed. They are faithful to their established nest sites, ie, cavities in our older buildings, but their traditional nesting habitat has been rapidly disappearing as a result of building demolition and renovation. Nest site losses are not currently compensated for in modern building work, fuelling the rapid decline of swift numbers. Please see the attached leaflet for information.</p> <p>The <u>Wandsworth Local Plan</u> (publication stage) is hugely disappointing and unsatisfactory as no reference has been made to the potential for constructive measures to support swifts as part of local redevelopment. The section of the plan relating to biodiversity, LP55, is very vague as regards the borough's objectives and ambitions for biodiversity net-gain, and there are no practical proposals through which to achieve 'biodiversity net-gain'. LP55 fails to highlight the potential of the built environment to provide new habitats, through features such as</p>

integrated universal swift bricks. These artificial nests are used by a range of garden bird species, eg the red-listed house sparrow, in addition to swifts. An image has been attached to show swift bricks, courtesy of Action for Swifts, (<https://actionforswifts.blogspot.com>)

The NPPF highlights the significance of small features in achieving biodiversity net-gain:

National Planning Policy Guidance:

<https://www.gov.uk/guidance/natural-environment>

Paragraph: 023 Reference ID: 8-023-20190721:

'Planning conditions or obligations can be used..... to achieve **biodiversity net gain**..... The work involved may.....involve creating new habitats, enhancing existing habitats,Relatively small features can often achieve important benefits for wildlife, such as incorporating '**swift bricks**' and bat boxes in developments.....'

LP55 contrasts with the robust and proactive approach seen in some other London local plans towards 'net-gain' in biodiversity. Merton, Richmond and Islington Local Plans all contain the following paragraph:

'Development.....should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.'

Due to the dearth of specific requirements and proposals in LP55, the issue of biodiversity enhancement and habitat creation will be left to the inclination, or disinclination, of developers. The lack of objectives and obligations are likely to result in absent or minimal biodiversity enhancement and habitat creation features. This is a missed opportunity to improve the outlook for our precious swifts and does nothing to help them avoid eventual extinction in the UK.

Justification for comments:

Swifts were classified as **Red-listed** in the BTO's *Birds of Conservation Concern 2021* report, signifying their **endangered** status and a need for **urgent conservation action**. Swifts are classified as **Endangered** in the current International Union for Conservation of Nature **Red List**, meaning they are at risk of extinction in the UK.

The Environment Agency's State of the Urban Environment report (23/07/21) confirms the loss of species which are '**urban specialists**', eg **swifts**:

'.....Some species are considered 'urban specialists'. For example, swifts, which nest in cavities in the roofs of older buildings.Urban specialist birds have declined in abundance in the UK since 1994..... Factors contributing to some of these species' declines include building, demolition, renovation and roof repair.'

<https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>

The Chartered Institute of Ecology and Environmental Management Journal, Issue 104, June 2019:

<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>

	<p>26/07/21: 'Swift Bricks: The 'Universal' Nest Brick – by Dick Newell': https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/</p> <p>https://swift-conservation.org/universal_swift_nest_brick02.pdf</p> <p><u>The Government's Building Better Building Beautiful Commission report 'Living With Beauty'</u></p> <p>(30/01/20, Policy Proposition 33, page 110) Recommends: 'Bricks for bees and birds in new build homes'.</p> <p>https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission</p> <p>For further information, please visit the official swift conservation website, https://swift-conservation.org/</p> <p>From</p> <p>Louise Cole, representing Wimbledon Swifts, 23 Kingswood Road SW19 3ND</p>
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The guidance around biodiversity net-gain was written to be flexible to allow applicants to propose their own solutions and to allow new technologies and practices be brought forward if they can be shown to produce the highest improvements to biodiversity and natural habitats.</p> <p>The Local Plan is considered sound but it is considered that some additional detail relating to swift bricks could be added for greater clarity</p>
Proposed Change	<p>Amend wording of paragraph 21.31 to read:</p> <p><i>'...Proposals should give consideration to the need for species to move between habitats and therefore seek to connect with existing green corridors where it is appropriate to do so. <u>All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.</u> All these features must also be protected during construction works, and this may be secured by a planning condition, as will subsequent maintenance and monitoring.'</i></p>
Consultee Full Name	<p>Mr fergus Jack</p>

Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	20
Title	Area Strategy for Balham
Number	10
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	You have allocated an open area in the heart of Balham as suitable for both high buildings and mixed use development. However you have described Balham as being typified by low rise Victorian and Edwardian buildings with retail on the ground floor with residential accommodation above. You also pick out key buildings such as the Bedford pub, which is a landmark as it can be seen from the station due to the open space provide by the surface car park on the Sainsbury's site. You also mention a lack of street trees in Balham, given that this site provides trees and is capable of providing more, your proposal to allow development and intensification seems at odds with your statement. You are also advising that the scheme be retail or leisure led on the ground floor, regardless of the fact that the restaurant formally Harrison's has been vacant for over two years and outside of Hildreth Street and the High Road, retail provision is secondary at best, with local traders and convenience retail making up the remainder. Development on this site will blight Balham for ever by loosing its airy, suburban feel, by crowding the site with unwanted and potentially under used retail as well as causing considerable pain to local traders during the development phase when well needed parking will be lost for two years. Whilst residential accommodation may be required across the borough, intensive development of existing housing estates would be far better suited to maintain the character of Balham and provide increased and updated accommodation for residents. This scheme strikes of a large retailer and house builder combing to put pressure on the council to allow development to maximise shareholder revenue at the expense of local community
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>The initial description of Balham is intended to set out the existing character, not necessarily to outline what parts of the town centre will be preserved indefinitely. Our site allocation proposals aim to coexist with the established character as best as possible.</p> <p>The site allocation permits a variety of uses alongside retail, which could occupy the ground floor units, including community and cultural uses. The intention is that such units will present active frontages, rather than a blank facade (e.g. if parking functions were incorporated at the ground floor level). That notwithstanding, the Council's Retail Needs Assesment finds that there is a long-term (by 2035) requirement for both convenience and comparison retail in the wider Balham area. While the priority is the reoccupation of vacant units, certain investment opportunities are likely to only result through redevelopment.</p> <p>All proposals will be required to include a detailed construction management plan which will mitigate as much as possible the impact of development on local residents including the requirement for parking which would be displaced.</p> <p>The site allocation requires new trees to be planted to frontages and LP56 Tree Management and Landscaping sets out the requirements for tree replacement.</p>

	The Council are considering every possible locational option for introducing new housing into the borough in a way that is sustainable and sites within town centres, with access to public transport are required to be intensified where possible.
Proposed Change	No changes are considered necessary.

Consultee Full Name	Mrs Louise Cole
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	21
Title	Green and Blue Infrastructure and the Natural Environment
Number	21
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>The Local Plan is not sound because it is not consistent with national or London policy, in particular:</p> <p>the London Plan (2021) Policy G6 Biodiversity and Access to Nature (item B(4), page 325), which calls for: "<i>artificial nest sites that are of particular relevance and benefit in an urban context</i>";</p> <p>https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>NPPG (Natural Environment 2019) Paragraph 023 highlights the value of swift bricks to wildlife: "<i>Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks'</i>"</p> <p>https://www.gov.uk/guidance/natural-environment</p> <p>These policies are to provide nesting places for red-listed endangered buildings-based species such as swifts, house sparrows, and starlings, that occur in Wandsworth but in rapidly declining numbers. These built habitats are excluded by the biodiversity net gain calculation and these species cannot use for nesting the other features mentioned in 21.31: green roofs and trees.</p>
Change(s) considered necessary	Please add to the end of the third paragraph of 21.31: , <i>and artificial nest sites that are of particular relevance and benefit in an urban context such as swift bricks.</i>
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The Local Plan is considered sound and does not conflict with London Plan policy G6 Biodiversity and Access to nature or the NPPG but it is considered that additional detail could be added for greater clarity.
Proposed Change	Amend wording of paragraph 21.31 to read:

	'...Proposals should give consideration to the need for species to move between habitats and therefore seek to connect with existing green corridors where it is appropriate to do so. <i>All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications. All these features must also be protected during construction works, and this may be secured by a planning condition, as will subsequent maintenance and monitoring.</i> '
Consultee Full Name	Metropolitan Police Service
Consultee Organisation Details	
Agent Full Name	Mr Vincent Gabbe
Agent Organisation Details	Consultant Knight Frank
Comment ID	22
Title	Paragraph
Number	5.57
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Site Allocation NE4 Metropolitan Police Workshop, Ponton Road, SW8</p> <p>The Metropolitan Police Service (MPS) made representations to this proposed allocation in previous drafts of the plan, including on 1st March 2021, in respect of the Regulation 18 Local Plan consultation. Those representations remain to be addressed.</p> <p>The site is owned by the Mayor's Office for Policing And Crime (MOPAC) and operated by the MPS as a workshop facility. The MPS is reviewing its current Estate Strategy including on-going disposals. It appears likely that the site is likely to be retained for operational use. The MPS are therefore keen to ensure that surrounding allocations will not have detrimental impacts on the security and operation of the MPS facility.</p> <p>In the unlikely event that the site were disposed of and redeveloped, the work carried out by MPS to date suggests that the proposed allocation would make redevelopment challenging. Complexities included a triangular site, the school requirement, 50% affordable housing, height limitations and proposals for a public footpath through the site.</p> <p>The Infrastructure Delivery Plan, which forms part of the evidence base for the draft plan, has a section at page 43 regarding primary school requirements, indicating that the need or otherwise to allocate for a school use at this site is unclear. The demand is not certain at this stage and another site exists. In this context, it appears unreasonable to burden an operational MPS site with such an allocation.</p>
Change(s) considered necessary	<p>MPS considers that the following modifications should be made to the policy:</p> <ol style="list-style-type: none"> 1. Acknowledge that MPS are likely to retain the site for the foreseeable future.

	2. Remove the school allocation.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	It is not considered necessary to include a statement that the site is likely to be retained for operational use. The site allocation explains that the development depends on the site no longer being required as an operational facility by the MPS. Paragraph 5.58 outlines that the Council will work with the site owners and developers in determining the educational requirement. Site allocations NE2 and NE12 include provision to ensure that any development does not have a detrimental impact on the security and operation of the MPS facility in NE4 so long as it remains as an MPS facility.
Proposed Change	No changes considered necessary.
Consultee Full Name	Mr David Thorne
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	23
Title	Paragraph
Number	10.13
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	This document appears to indicate that the Council intends to build on Sainsbury's car park which seems a very bad idea. Balham has very little green space in the town centre, so rather than building another concrete block, taking more light and sky space from the area while adding greatly to greenhouse gas emissions, the Council should turn the car park into a proper green space, a non-car park. There are some magnificent mature trees in this space already which could be retained. The current plan will probably fell these – what a travesty that would be. This space would make an excellent central hub for the town, would add to the vibrancy and desirability of the area and importantly provide some green lungs in this space currently dominated by short hail vehicle travel. Some minimal supermarket parking could be left for those who are unable to walk/cycle/use public transport. There is a climate emergency, we have to act now and redesign the way we live. This could be an iconic project on the way to a lower carbon world. Balham Town Park; you heard it here.
Change(s) considered necessary	See above

Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	This document is dense and barely accessible to proper public scrutiny. You need actual people who live here to participate rather than impose the will of faceless bureaucrats.
Council Response	The Council have a housing target which is to be met and providing residential accommodation among other uses at a highly sustainable location such as a town centre with public transport options adjacent is the most sustainable option. The site allocation includes tree planting, green roofs, and the expansion of the existing open space to the north of the site. Parking will be available on site.
Proposed Change	No change considered necessary.
Consultee Full Name	Miss Diana Brake
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	24
Title	Paragraph
Number	8.6
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	
Change(s) considered necessary	There are a lot of derelict phone boxes that hinder walking on the busy streets. These should be removed before considering adding benches. In fact I believe no benches should be added. I frequently have to walk in cycle/bus lanes as the pavements are crowded.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Benches would only be added to the area where they are well-positioned and wouldn't create any overcrowding issues.
Proposed Change	No change considered necessary.

Consultee Full Name	Miss Diana Brake
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	25
Title	Paragraph
Number	8.7
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	
Change(s) considered necessary	I think priority should be given to crossrail at Tooting Broadway. You have stated that we have enough retail and restaurant outlets. Traffic and transport is an issue. There are large spaces such as Tooting Tram that are empty for 4 days a week. Could this not be repurposed as a market?
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Tooting is the Council's preferred location for Crossrail 2. Details regarding market provision would be considered as part of the project.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Alexandra Hethrington
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	28

Title	Area Strategy for Balham
Number	10
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Area Strategy for Balham BA1 Sainsbury's Carpark</p> <p>Vision 10.12 says that you want to restore the town centre's character, and provide "an inclusive and connected public realm/open space and encourage urban greening to create a pleasant and people-focused urban environment".</p> <p>Your plans for the current Sainsbury's car park are the complete opposite of that. Yes it's a car park, but your proposal to fill the space with 5-storey buildings, far higher than any surrounding buildings, and incorporating 2 floors of car parking, is far worse and will ruin the heart of the town.</p> <p>It is one of the pleasant things about this area that it is a wide, open space. It is refreshing to leave the tall buildings hemming you in everywhere else in the town centre and enter an open expanse right in the heart of Balham. Building over this area by building new tall buildings and a multi-storey car park will be to the detriment of Balham by losing this open space vista and chance to breathe at its heart, rather than to its advantage or improvement.</p> <p>You must be aware of this given that in the Map 10.1 you actually flag the triangular area as a 'valued view and vista'. You can't have it both ways and say it's a valued view and vista, but you're going to build over it and obscure that view and vista by erecting 5-storey buildings!</p> <p>You also make no mention whatsoever of the well-established trees in the area. I remember that these were of significant importance when the future site was last argued over in the early 90s. They are still important now.</p> <p>A6 says: "Loss of public open space will be resisted and opportunities to create additional public open space and public realm enhancements will be supported, particularly where biodiversity and ecological improvement can also be realised."</p> <p>Yet you are actively proposing to do the exact opposite by building 5-storey buildings over the only open public space in the town centre.</p> <p>It is the fact that it is an open space that makes it an attractive feature of the town centre.</p> <p>I do not think this is the right development for the area</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The Sainsbury's car park site is characterised by openness but it is not an open space.</p> <p>The site allocation requires the pocket park to the north of the site to be enhanced. Green roofs should be provided to the built form to enrich biodiversity and trees should be planted to frontages. LP56 Tree Management and Landscaping sets out the requirements for tree replacement.</p> <p>PM8 Balham is considered sound and helps enhance important views in Wandsworth but to ensure the correct ones are protected the policy could be modified to ensure there is greater clarity as to which views are considered as part of the development process.</p> <p>Map 10.1 could benefit from a minor modification as the valued view and vista arrow at the junction of Balham Station Road and Bedford Hill should be moved slightly to more accurately point along those roads, as opposed toward the site allocation.</p>

	The approach to tall and mid-rise building heights and zones is considered to be consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations
Proposed Change	<p>Amend wording in PM8 Balham A(8) as follows:</p> <p>'Development proposals will be required to respect and enhance the <u>valued</u> views and vistas established in <u>Map 10.1 Spatial Area Map: Balham, the Urban Design Study (2021)</u></p> <p>Amend Map 10.1 as follows:</p> <p>Move the valued view and vista at the junction of Balham Station Road and Bedford Hill should be moved slightly to more accurately point along those roads.</p> <p>See appendix 1 for illustrated changes to these map.</p>
Consultee Full Name	Ms Valerie Selby
Consultee Organisation Details	Enable
Agent Full Name	
Agent Organisation Details	
Comment ID	29
Title	LP27 Housing Standards
Number	Policy 38
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Amend Policy LP27, criterion A.2 to read, 'meet all requirements for housing standards <i>and private internal space</i> set out in the Policy D6 of the London Plan, <i>and provide private outside space to a minimum of 10 sqm for 1 and 2 bedroom dwellings and 15 sqm for dwellings with 3 or more bedrooms (excluding footpaths, parking areas, access ways, side or front gardens)</i>;</p> <p>Add a new paragraph, 17.30, to state, '<i>In respect of private outside space, Policy D6 of the London Plan allows local standards to be applied at a higher level than it advocates. For a long time, Wandsworth has used an established and evidenced standard for external amenity space, which seeks 10sqm of space in non-family sized units and 15sqm in family sized units. It remains appropriate – particularly in light of the importance of having private outdoor space during the pandemic - to continue to apply these standards to new residential development.</i></p> <p>Re-number following paragraphs.</p>

<p>Change(s) considered necessary</p>	<p><u>Representation for the Reg.19 Local Plan - Policy LP27 – Housing Standards</u></p> <p>I wish to object to policy LP27 (criterion A2) of the Reg. 19 Wandsworth Local Plan.</p> <p>This criterion (along with A1) defaults housing size standards to the Nationally Described Space Standard and to Policy D6 of the Published London Plan. In the case of internal space standards, this is an acceptable route, as the national standards secure basic space needs for the functional running of a dwelling and contributes to good design.</p> <p>However, the national standards do not make any provision for <u>external amenity space</u>. Policy D6 of the London Plan does make provision for external amenity space (private outside space), but also clearly allows for local standards to exist.</p> <p>During the last two years of the pandemic, it has become abundantly clear that access to external space, outside of one's home, is important to provide access to open air, for break out space, for exercise and recreation and for maintaining one's mental health and wellbeing. This has emphasised the role that parks and open spaces play, but those without some form of external amenity space associated with their own homes have arguably been worse off for the absence of a garden, private terrace or balcony. The plan should be seeking to ensure that, where possible and appropriate, new homes have good quality, private amenity space, and that housing providers are not able to default to a (sometimes inadequate) minimum expectation.</p> <p>London Plan policy aims to set a bottom line for all of London but given London's huge diversity, cannot respond to local circumstances and context. Policy D6 clearly leaves an open door for local standards to be set, allowing authorities the freedom to realise external amenity space within new residential environments that suit the location, context, and future occupier. I understand that a number of authorities – including Lambeth, Southwark and Barnet – have done this in recent local plan documents, establishing a higher standard, particularly ensuring that family housing is able to support family activities within the residential curtilage.</p> <p>For a long time, Wandsworth has also had a higher standard for external amenity space. Based on evidence and experience, Policy DMH7 of the adopted plan seeks 10sqm of space in non-family sized units and 15sqm in family sized units. These standards have been, and continue to be, applied to new residential development in the borough and often deliver space at these levels. Where they cannot be met, they allow a discussion to be had about how space might best be provided within development to meet future resident needs without having to default to the London Plan minimum (e.g., through communal spaces or larger habitable rooms). Notwithstanding the maintenance of the 15sqm standard in policies LP26 and LP7 of the Regulation 19 Plan, the absence of any standard for external amenity space in new housing development in the plan threatens to undermine the opportunity to ensure that residents have access to good quality, private space associated to their own homes, and gives the impression that a 'pan-London minimum' is an acceptable way forward for new housing across Wandsworth in all of its diversity.</p> <p>The absence of a local standard for external amenity space is not justified given that a locally determined standard is viable, realistic and would not undermine other aspects of the plan (including housing delivery). The Plan should therefore reintroduce the standards for external amenity space as currently set out within the adopted Local Plan at Policy DMH7. This would also be consistent with the expectations set out for new family housing created on small sites or through conversions in Reg. 19 Policies LP7 and LP26. This provision could be made at criterion A2 of Policy LP27, or through the addition of a further criteria dealing specifically with external amenity space.</p>
<p>Wishes to attend Hearing Session</p>	
<p>Reason why</p>	
<p>Council Response</p>	<p>Comment noted. Upon further assessment the Council considers that a modification to the Local Plan would be appropriate. The modification will ensure that standards for private outdoor space are not eroded and homes continue to have a reasonable space for private enjoyment. The existing standards are well established and evidenced.</p>
<p>Proposed Change</p>	<p>Edit Policy LP27, criterion A.2 to read, 'meet all requirements for housing standards <u>and private internal space</u> set out in the Policy D6 of the London Plan, <u>and; provide private outside space to a minimum of 10 sqm for 1 and 2 bedroom dwellings and 15 sqm for dwellings with 3 or more bedrooms (excluding footpaths, parking areas, access ways, side or front gardens);</u></p> <p><i>Add a new paragraph, 17.30, to state, 'In respect of private outside space, Policy D6 of the London Plan allows local standards to be applied at a higher level than it advocates. For a long time, Wandsworth has used an established and evidenced standard for external amenity space, which seeks 10sqm of space in non-family sized units and 15sqm in family sized units. It remains appropriate – particularly in light of the importance of having private outdoor space during the pandemic - to continue to apply these standards to new residential development.'</i></p> <p>Renumber following paragraphs.</p>

Consultee Full Name	Isabella Jack
Consultee Organisation Details	Sustainable Development Advisor Natural England
Agent Full Name	
Agent Organisation Details	
Comment ID	31
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. After commenting on specific matters at the Regulation 18 stage, Natural England are satisfied that these comments have been addressed in this version of the local plan. We have no further comments on this draft of the local plan
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted
Proposed Change	No change considered necessary

Consultee Full Name	Unknown
Consultee Organisation Details	Style and Space Contractors Limited
Agent Full Name	Jeff Field
Agent Organisation Details	Senior Director BNP Paribas Real Estate
Comment ID	32
Title	Building a Strong Economy
Number	18
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Dear Sirs,</p> <p>Wandsworth Local Plan Review (Regulation 19) Representations submitted on behalf of Style & Space Ltd – Thornsett Road LSIA</p> <p>We write to submit Representations on behalf of Style & Space Contractors Ltd in response to the Council's Local Plan Review (Regulation 19). We made similar representations to the Regulation 18 draft but no Planning Officers from the Council have contacted us.</p> <p><u>THE REPRESENTATION</u></p> <p>We provide particular focus upon the Council's strategy towards LSIA's and policy LP34. Our Representations are that:</p> <ul style="list-style-type: none"> a) the Council is missing the opportunity to plan positively b) the Plan does not comply with the 2021 London Plan c) the evidence base is not supported by viability and therefore fails the test of deliverability d) the Council should separate out its stance between SILs and LSIA's e) the Plan fails to make effective use of urban land f) the Plan should not discourage residential uses within LSIA's g) the Plan seeks to differentiate between Class E uses in its policy application and restricting flexibility by conditions, contrary to the intention within legislation <p>BACKGROUND</p> <p>Land Ownership</p> <p>Our client owns land that sits within the Thornsett Road LSIA – land that has frontages to Penwith Road and Thornsett Road. Our client is familiar with the borough's industrial land context.</p> <p>Planning History</p> <p>The client's knowledge of the location is further enhanced through their submitted development proposals within the Thornsett Road LSIA</p>

The Council will be aware that our client recently received planning permission on appeal for two mixed-use development schemes within the Thornsett Road LSIA (APP/H5960/W/19/3235607 and 3235608). Here, we summarise some of the Inspector's conclusions:

- the proposed developments would provide full replacement of existing B1(c) and B8 floorspace in accordance with paragraph 2 of policy EI6 (para 11)
- the Inspector also considered the unlikelihood of a viable re-development of the site comprising solely those industrial uses supported by EI6 (para 13)
- there was consideration of the impact of non-industrial uses upon the activities within the LSIA, in particular residential use was found acceptable as it was raised well above the road on level 2 (para 14)
- the proposals provided light industrial use rather than general industrial use (para 15)
- the proposals should be given very significant weight particularly in the context of the Council's strategic objective to encourage sustainable economic development (para 17)
- the situation does not constitute exceptional circumstances and it would be unreasonable and unnecessary to impose a condition to restrict B1(c) to such uses within Class E (para 50)

All of these reasons suggest that the Council should consider a more positive approach to development within the Thornsett Road LSIA and as set out under policy LP37.

NATIONAL PLANNING POLICY FRAMEWORK (2021)

Sustainable Development and Plan-making

The purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7).

Paragraph 9 states that planning policies and decisions should play an active role in guiding developments towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

Paragraph 11 sets out that for plan-making, the application of the presumption in favour of sustainable development means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Paragraph 16 states that Plans should:

- be prepared with the objective of contributing to the achievement of sustainable development
- be prepared positively, in a way that is aspirational but deliverable
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees

Paragraph 35 sets out that Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

Building a strong, competitive economy

Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt....The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Efficient Use of Land

Paragraph 119 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land

Paragraph 120 goes on to state that planning policies should (inter alia) encourage multiple benefits from urban land, including through mixed use schemes recognising that land can perform many functions; and support the development of under-utilised land and buildings, and airspace above existing commercial premises for new homes.

Under paragraph 122, Councils should reflect changes in the demand for land and reallocate land for more deliverable uses where there is no reasonable prospect of development coming forward for the use allocated in the plan.

Delivering a sufficient supply of homes

Paragraph 60 states that it is important that a sufficient amount and variety of land can come forward for new housing in order to significantly boost the supply of homes.

LONDON PLAN (2021)

Industrial intensification, co-location and substitution

The 2021 London Plan sets out an approach towards intensification and co-location of uses within LSIA's.

Under Policy E7, it states that intensification can be used to facilitate additional industrial capacity but also support the delivery of residential or other uses, such as social infrastructure, or to contribute to town centre renewal.

The Plan states that this approach should only be considered as part of a plan-led process or as part of a co-ordinated masterplanning process. At Figure 6.3, the London Plan provides simplified illustrations for LSIA consolidation.

	<p>It is not part of the London Plan to prevent residential use within designated locally significant industrial areas.</p> <p>Optimisation of Previously Developed Land for Housing</p> <p>Policy H1 of the New London Plan states that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans, especially on sources of capacity including (inter alia):</p> <p>a) 'sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary; and</p> <p>c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.'</p> <p>In this respect, the Thornsett Road LSIA is PTAL5, close to the Earlsfield Centre and the Earlsfield train station.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Please see response to comment #33.
Proposed Change	No change considered necessary.
Consultee Full Name	Unknown
Consultee Organisation Details	Style and Space Contractors Limited
Agent Full Name	Jeff Field
Agent Organisation Details	Senior Director BNP Paribas Real Estate
Comment ID	33
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy

<p>Soundness - Complies with Duty to Co-operate?</p>	
<p>Details of reason(s) for representation</p>	<p><u>THE COUNCIL'S POLICY LP34</u> This policy seeks to deal with industrial land in the following way. Protecting Industrial Land and Premises A. The Council will support the use of land and premises for industry and distribution in appropriate locations, falling within the following uses: 1. Light industry (falling within Use Class E (giii)); 2. General industry (B2); 3. Storage and logistics/distribution (B8); 4. Flexible hybrid industrial space; 5. Secondary materials, waste management and aggregates; 6. Utilities infrastructure; 7. Land for suitable transport functions, including intermodal freight interchanges, rail and bus infrastructure; 8. Research and development of industrial and related products or processes (falling within Use Class E (gii)); and 9. Sui generis uses that relate to, and are necessary to support, the operation of sites of an industrial nature. Strategic Reservoir of Industrial Land B. A strategic reservoir of industrial land, comprised of the borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIAs), will be protected and retained. In these locations: 1. Uses identified in Part A will be supported. Where necessary, proposals may be subject to the use of planning conditions or Section 106 planning obligations in order to protect the industrial function of the land. 2. The redevelopment of sites must provide at least the full replacement of existing industrial floorspace, in accordance with those uses identified in Part A. 3. The intensification of sites for industrial purposes through increased floorspace will be strongly encouraged. Landowners should, where appropriate, work with those of adjacent sites in order to make the most efficient use of land. 4. Development proposals for other uses in these locations will not be supported, except in the following circumstances and provided that the use does not erode the effective operation of the industrial function of the SIL or LSIA: a. In the Battersea Design and Technology Quarter, SME office accommodation and research and development uses will be appropriate on upper floors, if it would result in the intensification of industrial uses on the site. Such development must accord with the Area Strategy and relevant Site Allocation. If the existing use of the site is solely or predominantly for office use, redevelopment must provide for new industrial uses on the ground floor, unless this would result in harm to a heritage asset and/or would cause material harm to the amenity of neighbouring occupiers or the operations of neighbouring uses. b. In other locations, offices and other non-industrial uses will only be supported where they are ancillary to the use of the site or premises for one or more of the industrial uses identified in Part A. c. In limited instances, non-industrial uses may be appropriate in these locations if they are small-scale and cater for the local needs of people working in the area. <u>EVIDENCE BASE</u> The AECOM Wandsworth Employment Land and Premises Study (October 2020) is important for the following reasons: - it identifies the Thornsett Road LSIA (Site C6) with having 'some potential' for development - the assessment that they undertook was qualitative based, on supply characteristics and does not include any analysis of viability or deliverability The Report describes the LSIA as follows (4.62 and Table 4.12): 'The cluster is well-occupied and there is no evidence of vacancy. A new industrial headquarters facility was built around 5 years ago. Towards the west of the cluster there are some buildings which are older in character. These could be intensified to provide additional industrial floorspace. However, this cluster is close to residential properties and community uses and there is limited parking space. There is also evidence that the existing space is particularly well suited to certain tenants including car servicing businesses'. An important consideration here is that AECOM used 'vacancy' as a key criterion as to whether intensification could take place. Furthermore, it talks about parking as a deterrent, however the 2021 London Plan seeks to encourage occupied buildings for intensification (redevelopment) and seeks to support car-free development in areas of good accessibility. <u>ANALYSIS</u></p>

Our analysis based on the above shows that:

- **the Council is missing the opportunity to plan positively** – it is clear from the London Plan, the NPPF and the AECOM Report that there is scope for intensification and that there are opportunities to introduce residential use.
- **the Plan does not comply with the 2021 London Plan** – London Plan Policy E7 encourages specifically within LSIA's, that boroughs should take the opportunity to promote intensification and co-location of industrial and residential uses. The Council has failed to take advantage of this opportunity.
- **the evidence base is not supported by viability and therefore fails the test of deliverability** – it is important that the Council undertakes viability testing of its planning policies.
- **the Council should separate out its stance between SILs and LSIA's** – it is considered that in accordance with the New London Plan, the Council could offer greater flexibility for LSIA's rather than SILs. In this way, the SILs can continue to provide a reservoir of the heavier industrial uses.
- **the Plan fails to make effective use of urban land** – by not adopting opportunities that could encourage other uses and by not considering viability (which could act as a deterrent to 'industrial' development), the Plan has failed to provide a context for re-cycling and making effective use of urban land.
- **the Plan should encourage residential uses where appropriate within LSIA's** – the Local Plan could encourage housing provided the parameters and protections for the LSIA's match those of the 2021 London Plan.
- **the Plan seeks to differentiate between Class E uses in its policy application and by conditions, thereby restricting flexibility intended in legislation** – it is questionable whether legally the Council's approach will be accepted. It proposes conditions limiting movement within Class E and suggests only certain activities within Class E are only suitable within the LSIA.

We consider that the Council will need to make fundamental changes to policy LP34 rather than our offering suggested changes at this stage. We welcome the opportunity for further discussions with the Council's Policy Team on how the Plan could be more positively prepared and be consistent with the 2021 London Plan and the NPPF.

Yours faithfully,

Jeff Field

Senior Director

Head of London Planning

Change(s) considered necessary

Wishes to attend Hearing Session

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

Reason why

Council Response

The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.

The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP34 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Circular Economy, Recycling and Waste Management), Part F specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".

Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.

It is recognised that in the appeal decision referenced within the representation, consideration of the impact of non-industrial uses upon the activities within the LSIA was made, and the Inspector found that “the proposed non-industrial uses would...be unlikely to undermine the functionality or attractiveness of the industrial offer”, however such considerations were made in the context of ‘the proposed industrial uses’ on the appeal site, rather than those within the LSIA as a whole. Furthermore, the appeal notes that the site proposals do “not include any general industrial use which would be more likely to generate levels of noise and disturbance to residential occupiers”, whereas such uses form the mainstay of the borough’s industrial need over the Local Plan period (as identified above).

In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the provision of additional housing and office development. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council’s Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough’s designated strategic reservoir of industrial land.

Furthermore, the Council does not agree with the assertion made in the representation that “the Plan does not comply with the New London Plan” with respect to Policy E7. Policy E7 states that in LSIS (the equivalent of the borough’s LSIA), “the scope for co-locating industrial uses with residential and other uses may be considered”, however it does not require such an approach. The supporting text notes that “some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses”. As identified above, the demand for industrial uses identified within the borough’s ELPS is predominantly derived from a demand for storage and distribution uses falling within use class B8.

For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.

Proposed Change	No changes considered necessary.
Consultee Full Name	Valor Real Estate Partners LLP
Consultee Organisation Details	Valor Real Estate Partners LLP
Agent Full Name	Mr James Guthrie
Agent Organisation Details	Associate Director Quod
Comment ID	35
Title	Building a Strong Economy
Number	18
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes

Details of reason(s) for representation	This consultation response is submitted by Quod on behalf of our client, Valor Real Estate Partners LLP (Valor). Valor owns an existing industrial site within the Lydden Road Locally Significant Industrial Area (LSIA) and is looking to redevelop and intensify this site to provide a modern industrial unit, in accordance with existing and emerging policy aspirations. Valor supports the economic objectives as set out in the draft Plan to safeguard land and buildings for ongoing business and industrial use.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted.
Proposed Change	No change required.
Consultee Full Name	Valor Real Estate Partners LLP
Consultee Organisation Details	Valor Real Estate Partners LLP
Agent Full Name	Mr James Guthrie
Agent Organisation Details	Associate Director Quod
Comment ID	36
Title	Area Strategy for the Wandle Valley
Number	12
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	The Site which Valor own is identified as being within the Area Strategy for Wandle Valley. The vision for this area is to protect the industrial land and create opportunities to modernise and intensify the sites. Valor strongly support this aim and is encouraged that this has been be translated into the Policy PM10 (Wandley Valley) which sets the blueprint for the Wandle Valley area, with which Valor's aspirations for their Site accords.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)

Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Valor Real Estate Partners LLP
Consultee Organisation Details	Valor Real Estate Partners LLP
Agent Full Name	Mr James Guthrie
Agent Organisation Details	Associate Director Quod
Comment ID	37
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy SDS1 (Spatial Development Strategy 2023- 2028) (part E) sets out that the Local Plan will support the delivery of a net increase of industrial floorspace through the protection and intensification of, amongst other areas, LSIAs. Valor offer strong support for this strategic policy which recognises the importance of LSIAs as part of the local economy and employment structure and the benefit offered to the Borough through the retention and intensification of such existing sites. Valor particularly welcome that the protection of the LSIA has been retained for the Lydden Road site, which is imperative to the soundness of this Plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Valor Real Estate Partners LLP
Consultee Organisation Details	Valor Real Estate Partners LLP
Agent Full Name	Mr James Guthrie

Agent Organisation Details	Associate Director Quod
Comment ID	38
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy LP34 (Managing land for industry and distribution) seeks to protect the reservoir of industrial land, including LSIA's, of which Lydden Road is one. Valor strongly support this policy and its strong intent to support the intensification of industrial sites through the provision of additional floorspace through redevelopment whilst also strongly protecting industrial sites across the Borough.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Mr Tom MRTPI
Consultee Organisation Details	National Planning Adviser Theatres Trust
Agent Full Name	
Agent Organisation Details	
Comment ID	40
Title	Paragraph
Number	16.28
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes

If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Theatres Trust is supportive of Policy LP18 as it provides strong protection against loss of valued cultural facilities including theatres, and is supportive of opportunities for new facilities.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Mr Tom MRTPI
Consultee Organisation Details	National Planning Adviser Theatres Trust
Agent Full Name	
Agent Organisation Details	
Comment ID	41
Title	Paragraph
Number	15.76
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	With reference to part E.4 the Trust is supportive of the Plan's application of the Agent of Change principle in protecting the operations of existing uses.
Change(s) considered necessary	

Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Mr Tom MRTPI
Consultee Organisation Details	National Planning Adviser Theatres Trust
Agent Full Name	
Agent Organisation Details	
Comment ID	42
Title	Paragraph
Number	19.34
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	With reference to part B the Trust is again supportive of the Plan's emphasis on protecting existing valued facilities from harm or loss where it would otherwise be undermined by incompatible nearby uses.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	James Hollands
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	43
Title	Paragraph

Number	6.10
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Section 6.10 makes the statement that the closure of Northcote Road has been positively received. This is not the case of residents who live near the road. The shops in the road have changed over the last two years and the changes are exclusively in favour of the hospitality sector. We are losing the shops that serve the local residents and getting bars in their place. The closures serve the bar owners and destination drinkers, not the local residents.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The pedestrianisation of the Northcote Road has received significant support for member of the public but we understand that this has not been universal. The Local Plan is not in a position to make any changes to the management of the pedestrianisation of Northcote Road but this comment will be passed on to those in the Council who will consider it.
Proposed Change	No change considered necessary
Consultee Full Name	Mr Jonathan Lawrence
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	44
Title	Area Strategy for Balham
Number	10
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Justified

Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	I object to this plan for a block up 7-8 storeys high, with additional parking capacity. Any development should be no higher than the surrounding Balham buildings, and Balham cannot cope with any increase in traffic on already congested road.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Jonathan Lawrence
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	45
Title	Paragraph
Number	10.22
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	No

Details of reason(s) for representation	The projected maximum block height of 7-8 storeys would overwhelm surrounding buildings, streets and open space. The provision of additional parking would worsen existing local congestion. If "Balham has a shop vacancy rate of 12%", then why build additional retail units? We don't need another empty depressing and depressed shopping centre.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. Car parking would be re-provided on the ground floor podium. Car parking will be reduced to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels. This will be done to ensure that the borough can meet its mode share target for 82% per cent of trips to be made by public transport and active travel or reduce the need to travel by 2041.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The tall building maps identifies an appropriate tall building height range for the zone and shows how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. It would be up to applicant to justify an alternative approach to the principle of the location of taller elements of a scheme compared to that of the shading as set out within the tall building zones. Development proposals exceeding the appropriate height will not be supported on design grounds.</p> <p>The site allocation permits a variety of uses alongside retail, which could occupy the ground floor units, including community and cultural uses. The intention is that such units will present active frontages, rather than a blank façade (e.g. if parking functions were incorporated at the ground floor level). That notwithstanding, the Council's Retail Needs Assessment finds that there is a long-term (by 2035) requirement for both convenience and comparison retail in the wider Balham area. While the priority is the reoccupation of vacant units, certain investment opportunities are likely to only result through redevelopment.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Caroline Hartnell
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	46
Title	Paragraph
Number	10.14
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	In my view, the local plan is not legally compliant with national policy to cut carbon emissions by 78% by 2035 compared to 1990 levels. It is therefore unsound. It is not positively prepared in that the changes suggested will have a strongly negative effect on the character of Balham town centre.
Change(s) considered necessary	In order to cut carbon emissions, much stronger measures need to be taken to reduce car use - which means enhancing walking, cycling and public transport not increasing car parking space. We also need increased and enhanced open space. WBC should convert a large part of the present Sainsbury's car park into open space, with more trees and other plants. Under no circumstances should there be buildings of 5-6 storeys or 7-8 storeys on this space. They would completely overshadow the surrounding area which - although unfortunately largely a car park - nevertheless has a nice open feel. Balham does not need further retail outlets. According to the local plan, 14% of shop spaces are already empty. If we are to make any progress in addressing the climate and ecological emergency, we cannot have more and more 'comparison shopping' - we need less and less of it.
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The emission targets referenced are not directly related to planning and the built environment but are a strategic ambition for the UK as a whole. This site is a proposed site allocation to ensure that growth, renewal and regeneration comes forward with development proposals that meet need, address identified development considerations and deliver identified design requirements in accordance with the policies of the plan including LP10 - responding to the climate crisis. The open space to the north east of the car park would be communal open space that would be enhanced as part of any proposal.

	<p>Detailed provision of the amount and type of parking will be made available with any proposal for development of the site.</p> <p>The site allocation permits a variety of uses alongside retail, which could occupy the ground floor units, including community and cultural uses. The intention is that such units will present active frontages, rather than a blank façade (e.g. if parking functions were incorporated at the ground floor level). That notwithstanding, the Council's Retail Needs Assessment finds that there is a long-term (by 2035) requirement for both convenience and comparison retail in the wider Balham area. While the priority is the reoccupation of vacant units, certain investment opportunities are likely to only result through redevelopment.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Michelle Praest
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	47
Title	Paragraph
Number	21.23
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	<p>Proposals which replace outdoor open space for largely indoor recreation facilities will not be permitted due to the loss of open space.</p> <p>You have sold the B and Q site and the Homebase site for housing in an already densely populated area. The open space of the carparks on both sites would make great locations for indoor facilities. Rather than a complete ban on indoor recreation facilities how about support to build a Guildford Spectrum style Leisure centre in Putney. This would improve the health and wellbeing of local residents and would be a better use of land than tall high rise buildings.</p> <p>I would like to preserve open spaces, however when sites are sold they are being given to developers with no thought about how the space will used to enhance the local area or provide attractive areas to walk around in. The Riverside Quarter, this is a poor example of public space use and is not a place people would go to relax.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	

Council Response	<p>Car parks are often characterised by openness but are not themselves open spaces. Open spaces are protected in the Local Plan through LP53 Protection and Enhancement of Green and Blue Infrastructure.</p> <p>LP54 Open Space, Sport and Recreation sets out the requirement for new Indoor Sports or Recreation facilities in the borough.</p> <p>The Council is in a position where it is required to meet a housing target and to do so developments such as the B&Q site and the Homebase site have been brought forward as part of a masterplanned approach to developing Wandsworth Town.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Michelle Praest
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	48
Title	Paragraph
Number	16.8
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>A substantial part of the difference in health outcomes is down to a diverse range of social, economic and environmental factors that shape people's lives ...</p> <p>Access to green spaces... I would like to take my children cycling in nature, in Richmond Park however it is impossible to get there. This is an example of the haves and have nots. If you are wealthy enough to have a car then you can pack up bikes and go to the park to cycle in nature. Whilst Wandsworth has a range of green space and they are able to be reached on foot, to experience quiet, wide open nature you need a car so it is prohibitive and only the preserve of the wealthy. As well as improving Wandsworth it is important to think about the close by green spaces and how to open these up to the residents of this borough. I wish there was a bike bus so parents could take their children and bikes out cycling easily in places like Richmond Park.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The Wandsworth Open Space Study catalogues and examines areas of open space in the borough and assesses how accessible they are. This will be used to help improve areas of open space and accessibility to them in the future.

	<p>Local Plan policies LP20 New Open Space and LP53 Protection and Enhancement of Green and Blue Infrastructure set out requirements for development to help improve access in the areas identified as deficient and to improve accessibility to existing areas of open space.</p> <p>LP49 Sustainable Transport aims to improve the active travel environment of the borough which will grant greater access to open spaces.</p>
Proposed Change	No change required.
Consultee Full Name	Mrs Michelle Praest
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	49
Title	Paragraph
Number	16.42
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	<p>Design and implementation:</p> <p>It has taken a long time for the playground at King George park to be designed, consulted on and then to be built and there is very little communication to the public about when it will be completed.</p> <p>The key feature of a successful space for play is its 'playability.' A playable space is one where children's active play is a legitimate use of the space - Historically playgrounds in our area have been left to age with very little money spent on creating beautiful spaces that have playability. The council needs to put children's play at the centre of park design and ensure that playgrounds are spaces for abled and disabled children and also have a range of equipment to excite and engage children. Wandsworth Park is in need of a playability assessment and the local community should be consulted on potential designs.</p>
Change(s) considered necessary	<p>The creation of play value through fixed equipment, informal recreation activities or engaging landscaping features should be a key requirement.</p> <p>You could also mention inclusivity to allow all children to access the playgrounds in their own way and at their developmental stage.</p>
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	

Council Response	Comments noted. LP19 Play Spaces sets out the Council's requirements for new play spaces including that they must be inclusive to all.
Proposed Change	No change considered necessary.

Consultee Full Name	Mrs Michelle Praest
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	50
Title	Paragraph
Number	16.46
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	play space required can be calculated using the Council's Population Yield Calculator What new play spaces will be created after the development of the B and Q and Homebase sites? What provision for additional green spaces for ball sports / football and also play spaces for children's playgrounds? It is not good enough that a chunk of land is sold to a developer, the council and the developer should be compelled to carve out a slice of land for community recreational use.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	The Council's Planning Obligations SPD sets out guidance as to how much open space should be provided from a development. The specifics of what new play space is being provided for a particular development can be found on the Council website.
Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Michelle Praest
Consultee Organisation Details	
Agent Full Name	

Agent Organisation Details	
Comment ID	51
Title	Paragraph
Number	16.48
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Accessible and usable open spaces Pocket park in the Riverside development is a tiny sliver of land and not enough. Accessible and useable and attractive spaces that improve the local environment. What is said and how this is carried out is not successful and doesn't not create attractive lively open spaces where people can play, relax and enjoy with their families.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Michelle Praest
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	52
Title	Paragraph
Number	16.55

Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Allotments have been shown to successfully provide recreational value and improve individuals physical and mental well-being For whom? I have been on the allotment list for 10 Years. A small percentage of the population has access to allotments. When will the management and creation of allotments be addressed. They are in short supply and not available to local long term residents.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Recreation value and improvements to physical and mental wellbeing are experienced by those who have access to allotments. To address the deficiency of allotment provision in the borough LP21 Allotment and Food Growing Spaces aims to increase existing provision.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Michael Priaulx
Consultee Organisation Details	Swifts Local Network: Swifts & Planning Group
Agent Full Name	
Agent Organisation Details	
Comment ID	53
Title	Paragraph
Number	21.31
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes

Details of reason(s) for representation	<p>The Local Plan is not sound because it is not consistent with national or London policy, and also inconsistent with the Wandsworth Biodiversity Strategy 2020 which states that policies for priority species will be included in the Local Plan, but the Local Plan does not do so (the Statement of Consultation for the pre-publication stage incorrectly states that this would be captured in the Biodiversity Strategy for Wandsworth, and so creates an unresolved loop between the Biodiversity Strategy and Local Plan).</p> <p>In more detail, the Wandsworth Biodiversity Strategy 2020 (chapter 10, page 9) states: "Priority species in Wandsworth are:... swift... priority species will be afforded protection from development through appropriate policies in the Wandsworth Local Plan" - however, the Local Plan does not do this and the Statement of Consultation Regulation 18 January 2020 for the pre-publication stage states (comment numbers 278, 239, 270 and 431): "swifts/ swift nesting boxes... Details about this would be captured in the Biodiversity Strategy for Wandsworth which has been adopted...", thereby creating an unresolved loop between Biodiversity Strategy and Local Plan.</p> <p>The supporting policies for the change are:</p> <p>London Plan (2021) Policy G6 Biodiversity and Access to Nature item B4 (page 325): "<i>Boroughs, in developing Development Plans, should: ... artificial nest sites that are of particular relevance and benefit in an urban context</i>";</p> <ul style="list-style-type: none"> • https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf <p>NPPG Natural Environment (2019) Paragraph 023 states the value to wildlife of swift bricks specifically: "<i>Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks'</i>"</p> <ul style="list-style-type: none"> • https://www.gov.uk/guidance/natural-environment <p>Swift bricks are a universal nest brick so also provide for other Wandsworth priority species: house sparrow and starling. Note that the DEFRA net gain for biodiversity methodology doesn't give value to either existing populations of building-based birds, or the provision of artificial nest sites, so therefore a separate policy is required for protection of priority species such as swifts which use buildings to nest.</p>
Change(s) considered necessary	Please add to the end of the third sentence of 21.31: , <i>and artificial nest sites that are of particular relevance and benefit in an urban context such as swift bricks.</i>
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To provide further information, if required.
Council Response	<p>LP55 Biodiversity sets out that the Council will protect priority species and the Wandsworth Biodiversity Strategy sets out in a list what those priority species are.</p> <p>The Local Plan is considered sound and does not conflict with London Plan policy G6 Biodiversity and Access to nature or the NPPG but it is considered that additional detail could be added for greater clarity.</p>
Proposed Change	<p>Amend wording of paragraph 21.31 to read:</p> <p><i>'...Proposals should give consideration to the need for species to move between habitats and therefore seek to connect with existing green corridors where it is appropriate to do so. <u>All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications.</u> All these features must also be protected during construction works, and this may be secured by a planning condition, as will subsequent maintenance and monitoring.'</i></p>

Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	54
Title	Paragraph
Number	10.6
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	The statement that <i>'there are several larger more modern premises on the outskirts of the town centre boundary. The quality of these buildings is good, and there is little evidence of vacancy.'</i> feels like it assumes Irene House has remained in commercial use. It has in fact been converted to offices, leaving little to no purpose use office space on the town boundary. This conversion was a clear failure to co-operate, given the space was intended to be protected for commercial use in all draft (and the previous) version(s) of the Local Plan. Despite this being raised in the previous consultation, the change of use of Irene House (to residential, an area not heavily targeted for Balham) has been ignored in the production of this plan (including not reducing the target residential unit number). This is a clear failure to co-operate and borders on legal non-compliance. Nor does the Local Plan offer solutions to replace the commercial space that existed in Irene house, to restore the mix that helped Balham thrive. This makes it unsound. Balham is fairly uniquely placed in terms of road, cycle, rail and tube accessibility which makes commercial development highly viable and attractive to residents; this will only increase from our links to the Enterprise Zone in Battersea; this should be addressed.
Change(s) considered necessary	Suggest that it is acknowledged that Irene House was developed against the councils wishes (which I presume it was given the Local Plan wording) and offer potential solutions to make commercial development further attractive to developers and / or the council themselves.
Wishes to attend Hearing Session	
Reason why	I have raised this point before and researched heavily into the point. As a long term resident of the borough keen on progress and with working knowledge of the development and construction landscape in London, I am able to positively add to the hearing.
Council Response	<p>Comment noted. The change of use from office to residential had not begun when this paragraph was originally drafted, however it is agreed that it should have been deleted as part of the Publication version as it is now inaccurate. This should be corrected.</p> <p>The consent relating to Irene House was secured via prior approval for permitted development. While the development proposal is inconsistent with the approach taken in this Local Plan (and indeed the adopted Local Plan), the GPDO (General Permitted Development Order) requires the Council to make a determination on a prior approval application within 56 days of receiving the application or otherwise permission is automatically granted. This 56 day expiry date fell before the Article 4 Direction came into force and therefore the Council had no choice but to make a determination under the GDPO. The GDPO sets out the criteria under which the application must be assessed, which unfortunately does not include loss of employment floorspace.</p> <p>This history is considered too detailed to include as part of a forward looking planning strategy.</p> <p>The Local Plan does, however, include commercial uses as permissible within the Site Allocation BA1 Sainsbury's Car Park, which could help to mitigate this loss.</p>

	Comments on how this site relates to the housing capacity identified for Balham in PM8.B.1 are addressed more fully in comment number 56.
Proposed Change	Amend paragraph 10.6 as follows: "Office floorspace in Balham is generally limited to units above ground floor retail premises; however there are several larger more modern premises on the outskirts of the town centre boundary. The quality of these buildings is good, and there is little evidence of vacancy. The Sainsbury's site and car park within the 'Balham triangle' could present..."
Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	55
Title	Paragraph
Number	10.7
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Minor item, but given the success of the pedestrianisation of Bedford Hill last year, I believe traffic planning considerations should be considered to enable further and less temporary pedestrianisation of the street at weekends.
Change(s) considered necessary	The Plan should be revised to state that the council will review options for the pedestrianisation of Bedford Hill at weekends.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	I have raised this point before and researched heavily into the point. As a long term resident of the borough keen on progress and with working knowledge of the development and construction landscape in London, I am able to positively add to the hearing.
Council Response	Temporary pedestrianisations of specific streets are not within the remit of the Local Plan, however, these comments will be relayed to the relevant departments in the Council.
Proposed Change	No changes are considered necessary.
Consultee Full Name	Mr Gavin Chandler

Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	56
Title	Paragraph
Number	10.12
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	The Plan seems to have been written without the knowledge of the Irene House development on the edge of the town centre (indicated by Irene House remaining as commercial use in the Plan and referenced as provided office space). The Irene House development will provide, or has provided, 84 additional homes; this far exceeds the capacity target of 48 new homes in the plan. This puts the soundness of the plan at risk and, given this was raised in the previous consultation, represents a failure to cooperate.
Change(s) considered necessary	Suggest that the 48 Home target is removed and the Inclusive Growth section of the Balham plan focuses on retail and commercial growth. To complete this, a new point should be added to state that the commercial space lost by the Irene House development will be replaced (and I propose to make this realistic an area given within which commercial developments will be positively thought of)
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The Plan seems to have been written without the knowledge of the Irene House development on the edge of the town centre (indicated by Irene House remaining as commercial use in the Plan and referenced as provided office space). The Irene House development will provide, or has provided, 84 additional homes; this far exceeds the capacity target of 48 new homes in the plan. This puts the soundness of the plan at risk and, given this was raised in the previous consultation, represents a failure to cooperate.
Council Response	The housing capacity identified in PM8.B.1 relates to those which could be delivered during the first 10 years of the Local Plan period, from the anticipated date of adoption in 2023 to 2033, factoring in a probability of development. It would therefore not include the housing units that have been delivered by the Irene House scheme, which was recorded in the Council's monitoring data as being completed in September 2021.
Proposed Change	No changes considered necessary.
Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	

Comment ID	57
Title	Paragraph
Number	10.23
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	This should be extended to public realm green space at roof level, in line with the requirement of the plan for open spaces and with current City of London development trends
Change(s) considered necessary	Developments should provide open spaces for public use at roof level.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	Yes; I have experience in this area
Council Response	Comments noted. LP20 New Open Space sets out the open space requirements for new developments. Green roofs should be provided to the built form of this site allocation to enrich biodiversity and trees should be planted to frontages. Public access may be included by the applicant but it is not a requirement as some of the biodiversity elements may be better served and enriched by not having the area open to public access.
Proposed Change	No changes are considered necessary.

Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	58
Title	BA1 Sainsbury's Car Park, Bedford Hill, SW12
Number	Map 10.2
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Clearly, while the area is not an open space, this development will significantly impact the town for the vast majority of the town centre's users and residents. The car park is vital to the town and a large reason why Balham has such a thriving feel to it, particularly for those with young children, the elderly and the disabled, for whom public transport isn't always a pragmatic option. The allocation of the area as (relatively high rise) will also completely change the feel of the east side of town, which currently feels open. This part of the plan needs serious revision and lacks soundness, is out of sink with national and local policy to create open spaces and seems to have been done without the thoughts of the residents in mind.
Change(s) considered necessary	Ideally, the area remains as a car park at ground level. If unviable then any development should be low rise, retail and commercial focussed with a height limit in line with the east side of Bedford Hill. The number of parking spaces should be replicated (as a minimum) within the development and open public space should be provided at roof level.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	Informed local opinion is vital for this part of the plan.
Council Response	Comment noted. The site is characterised by openness but it is not an open space as you have identified. Car parking would be re-provided on the ground floor podium. Car parking will be reduced to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels. This will be done to ensure that the borough can meet its mode share target for 82% per cent of trips to be made by public transport and active travel or reduce the need to travel by 2041. LP20 New Open Space sets out the open space requirements for new developments. The site allocation includes tree planting, green roofs, and the expansion of the existing open space to the north of the site. Green roofs should be provided to the built form of this site allocation to enrich biodiversity and trees should be planted to frontages.
Proposed Change	No changes are considered necessary.

Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	59
Title	Paragraph
Number	10.17
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	See comments elsewhere, the number of parking spaces should replicate the current provision.
Change(s) considered necessary	See comments elsewhere, the number of parking spaces should replicate the current provision.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	This part of the plan is vital to Balham residents and any hearing needs informed local opinion.
Council Response	Car parking would be re-provided on the ground floor podium. Car parking will be reduced to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels. This will be done to ensure that the borough can meet its mode share target for 82% per cent of trips to be made by public transport and active travel or reduce the need to travel by 2041.
Proposed Change	No changes are considered necessary.
Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	

Comment ID	60
Title	Paragraph
Number	18.50
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Irene House is still shown as an Economic Use Protected Area - the only significant one in Balham. This has been converted from office use to 84 new homes. Clearly this impacts the Plans soundness and compliance. The economic use should be replicated elsewhere.
Change(s) considered necessary	A new area for commercial development needs to be allocated in the Balham Area and references to Irene House require deleting (regrettably).
Wishes to attend Hearing Session	
Reason why	This (protecting our economy) is key to Balham residents. Whilst the development of Irene House is unlikely to be reversed, the intention of the Plan as is is sound, so informed local opinion is required on how that commercial space should be replaced.
Council Response	<p>This Economic Use Protection Area (EUPA) - Irene House, 218 Balham High Road and 25 Boundaries Road - includes the site at 25 Boundaries Road, which accommodates a self-storage facility. As an economic use for which there is an identified demand (storage and distribution uses), it is important that this is retained. It is recognised that that Irene House development now accommodates residential uses, and as such this site could be removed from the boundary of this EUPA.</p> <p>Commercial uses, including the potential for offices, are included within the Site Allocation BA1 Sainsbury's Car Park, Bedford Hill. This could help to mitigate the loss, should the development come forward.</p>
Proposed Change	<p>Amend the boundary of the 'Irene House, 218 Balham High Road and 25 Boundaries Road' Economic Use Protection Area to remove the site at 218 Balham High Road (Irene House). The layer should be appropriately renamed.</p> <p>See Appendix 1 for visualisation of mapping changes.</p>
Consultee Full Name	Mr Gavin Chandler
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	

Comment ID	61
Title	Paragraph
Number	18.50
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Irene House is still listed, despite having been converted to residential units. The intention of this area of the report is sound, so how is this economic use going to be replicated in Balham. The Plan needs to address that in order to be compliant, sound and for the council to demonstrate co-operation.
Change(s) considered necessary	Irene House needs to be deleted, with explanation, and an alternative for Balham (particularly to attract the sort of development detailed in 18.16) identified by the council.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	This is a vital lose of economic use for Balham and local informed opinion is required.
Council Response	Please see the response to comment #60.
Proposed Change	Please see the response to comment #60.

Consultee Full Name	Mr Angus Robertson
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	62
Title	Paragraph
Number	9.12
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Why the Area Strategy for Roehampton and Alton Estate Regeneration Area is not sound:</p> <p>Two of the tests for soundness are that the Plan is; <i>'Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs.....'and;</i> <i>'Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence'.</i></p> <p>Under the Vision for the Area Strategy for Roehampton and Alton Estate Regeneration Area, section 9.12.2 states an objective as 'Promoting the replacement of poor-quality housing stock'. However, no objective assessment has been provided (within the draft Plan or in any of the supporting documentation) to objectively demonstrate the 'poor quality' of the housing stock and no evidence has been presented to assess whether there is or is not a need to replace this housing stock. Furthermore, no alternatives to the 'replacement of housing stock' have been assessed to demonstrate that the replacement of the housing stock is an appropriate strategy.</p> <p>Furthermore, another test for soundness is that the Plan is <i>'Effective - deliverable over the plan period.....'</i>. The Local Plan and the Area Strategy for Roehampton and Alton Estate Regeneration Area, as drafted, presumes that the specific regeneration plan for the Alton Estate will and should happen. Not only is it inappropriate for a Local Plan to rely on a specific regeneration route in this way but also, the proposed Regeneration of the Alton Estate has not happened although it has been proposed and discussed for nearly 18 years. It is therefore inappropriate to assume that it will now, during the term of this Local Plan.</p> <p>As a result, this section of the Plan and this key objective for the Area Strategy is neither 'positively prepared' nor 'justified' nor 'effective' and as a result I think it is not sound.</p> <p>Why the Area Strategy for Roehampton and Alton Estate Regeneration Area is non-compliant:</p> <p>The draft Local Plan references the commitments and targets of the Wandsworth Environmental & Sustainability Strategy (WESS) and associated Action Plan. The strategy states that 'the Wandsworth Local Plan is the main framework for sustainable development', with a target for 'developments reaching zero-carbon building targets'.</p> <p>Furthermore, in the draft Plan Policy LP10, 'Responding to the Climate Crisis: Sustainable Construction and Design' states that 'In order to mitigate the effects of climate change and achieve the Council's target of becoming a zero-carbon borough by 2050, development proposals should;.....5. Retain existing buildings and their embodied carbon in renewal and regeneration projects where this is a viable option.' And section 15.10 states that 'The existing building stock in Wandsworth makes a significant contribution to the borough's carbon emissions and therefore could have a positive role to play through where possible retention and refurbishment. As such, conversions, extensions and refurbishment of existing buildings, including for a different use, present an opportunity to reduce carbon dioxide emissions through retrofitting.'</p>

	<p>However, the objectives of the Sustainability Appraisal (SA) published with the draft Local Plan ('a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives') whilst dealing with consideration of climate change, do not mention considerations about retaining existing buildings and their embodied carbon or zero carbon building targets. In this context the SA is non-compliant with Wandsworth's own Environmental Strategy.</p> <p>Furthermore, the Area Strategy for Roehampton and Alton Estate Regeneration Area takes no account of all of these environmental policy commitments to climate change mitigation, zero carbon building targets or the potential for retrofitting. It has not considered and objectively assessed whether the retention of the existing buildings and their embodied carbon is 'a viable option'. Instead, it sets the objective of 'replacement of housing stock' by an envisioned large-scale demolition with the associated emission of vast amounts of embodied carbon that this would bring.</p> <p>As a result, neither the Sustainability Assessment nor the Area Strategy for Roehampton and Alton Estate Regeneration Area are legally compliant with Wandsworth's own Environmental & Sustainability Strategy (WESS).</p>
Change(s) considered necessary	<p>The Area Strategy for Roehampton and Alton Estate Regeneration Area should therefore be modified by removing objective 9.12.2 and replacing it with two new objectives for this Area Strategy; one to objectively assess the exact condition of the existing housing stock, and one to explore the range of different options that could be followed to achieve the vision and objectives of the Local Plan in this area with respect to the existing housing stock.</p> <p>The Sustainability Assessment should be modified to include a full assessment of the policy commitments made through WESS, including objective for the retention of embodied carbon (when viable) and zero carbon building targets. And the Area Strategy for Roehampton and Alton Estate Regeneration Area should be modified to remove the objective for 'replacement of existing housing stock' and should be replaced by one to objectively assess whether the existing building stock could be retained.</p>
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The Local Plan strategy reflects and builds upon the past work on the Alton Estate and provides a framework for future work. It is intended to sit seamlessly into the borough-wide strategy bearing in mind the context of change already occurring in Roehampton.</p> <p>The process of testing and reviewing options, and demanding stock condition, lies outside the remit of the Local Plan.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Balham Society
Consultee Organisation Details	Balham Society
Agent Full Name	
Agent Organisation Details	
Comment ID	63
Title	Paragraph
Number	10.2
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	

Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	
Change(s) considered necessary	The "Gateway to the South" epithet did not originate from the coming of the railway in 1856, but from a comedy sketch <i>Balham: Gateway to the South</i> written in the late 1940s by Frank Muir and Denis Norden, the best-known version of which was by Peter Sellers, and was not intended to be taken seriously.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	Perhaps this could be corrected.
Council Response	Comment noted. The Council appreciate this coming to light and were unaware of the history of the satirical nature of the title. It is considered this could be changed to more earnestly capture the description of Balham.
Proposed Change	Amend wording in paragraph 10.02 as follows: "Balham developed as a small town centre following the opening of the railway in 1856, becoming known as the 'gateway to the south'."
Consultee Full Name	Balham Society
Consultee Organisation Details	Balham Society
Agent Full Name	
Agent Organisation Details	
Comment ID	64
Title	Paragraph
Number	10.6
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	This para. does not seem to reflect Council policy which is unequivocally that the Crossrail 2 station should be at Tooting, and that a station at Balham would do significant damage to Balham Town Centre, whereas Tooting would benefit from a station. Balham already has direct links to all the stations mentioned whereas Tooting does not. In terms of rail and underground travel, Balham is already ideally connected, unlike Tooting, and the increased connectivity would be significantly less than for Tooting.

	It is not mentioned that a significant amount of demolition would be required at Balham, although this is mentioned in respect of Tooting (p.185, para.8.7). The loss of Waitrose, for example, would significantly damage Balham Town Centre, as this supermarket draws people into Balham, who then also patronise the town centre in general. Irene House, which would also be demolished, has recently been redeveloped for residential use.
Change(s) considered necessary	We hope the Plan can be modified to take our observations into account.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To amplify our points. We may in due course decide not to participate.
Council Response	The Council's preferred option is to for Crossrail 2 to be located in Tooting, however, as the project is currently suspended a final decision on its location is still unknown.
Proposed Change	No changes are considered necessary.
Consultee Full Name	Balham Society
Consultee Organisation Details	Balham Society
Agent Full Name	
Agent Organisation Details	
Comment ID	65
Title	Paragraph
Number	10.7
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	There is a conundrum relating to parking. On the one hand, it would be desirable to reduce the amount of traffic; on the other, availability of parking is, for many people, one of the reasons to shop in Balham, and the loss of the car park could simply mean that many people will stop shopping in Balham and will drive longer distances to shop elsewhere. Both Balham and the cause of traffic reduction would suffer. There is no easy answer, but both sides of the argument need to be taken into consideration.
Change(s) considered necessary	We hope the Plan can be modified to take our observations into account.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To amplify our point. We may in due course consider it not necessary to participate.

Council Response	Comment noted. The Local Plan aims to reduce the overall amount of trips people have to make in the borough by encouraging active travel and more sustainable modes of transport, thus reducing the need for car journeys and car parking. The Local Plan's transport and placemaking policies try where possible to strike a balance between the needs of all users of the borough.
Proposed Change	No changes are considered necessary.

Consultee Full Name	Balham Society
Consultee Organisation Details	Balham Society
Agent Full Name	
Agent Organisation Details	
Comment ID	67
Title	Paragraph
Number	10.24
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Para.10.1 refers to the "human-scale townscape", which is one of Balham Town Centre's appealing characteristics. In this context, 7-8 stories at the highest point would be too high, as it would have lost a sense of proportion to the properties opposite on Bedford Hill, and could create an overbearing atmosphere. 5-6 storeys would seem a more reasonable maximum, as the proportion would be retained, and with it a sense of relatedness between the existing buildings and the new ones. Although currently a car park, the site's open aspect does have some pleasing characteristics, including the trees, in a neighbourhood of open space deficiency, and retaining an element of this would be desirable.
Change(s) considered necessary	We hope the Plan can be modified to reflect our points.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To amplify our points. We may in due course consider it not necessary to participate.
Council Response	<p>Comments noted. The site is characterised by openness but it is not an open space.</p> <p>The site allocation requires new trees to be planted to frontages and LP56 Tree Management and Landscaping sets out the requirements for tree replacement.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Susanne Mitchell

Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	68
Title	Paragraph
Number	10.4
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Hildreth Street Market may be popular but has few stalls. Conditions to encourage more stall holders should be part of the plan
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	PM8 sets out that the development proposals on Hildreth Street should contribute to the pedestrian environment and the public realm to support the operation of street market that takes place here.
Proposed Change	No change considered necessary.
Consultee Full Name	Susanne Mitchell
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	69
Title	Paragraph
Number	10.6

Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Balham is already connected to Clapham Junction and Victoria. CR2 will not be as beneficial as it would be in Tooting.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Council's preferred option is to for Crossrail 2 to be located in Tooting, however, as the project is currently suspended a final decision on its location is still unknown.
Proposed Change	No change considered necessary.
Consultee Full Name	Workspace Management Ltd
Consultee Organisation Details	
Agent Full Name	Tiffany Mallen
Agent Organisation Details	Senior Planner Rolfe Judd
Comment ID	71
Title	WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18
Number	Statement 67
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	London Borough of Wandsworth Local Plan; Publication (Regulation 19) Version (January 2022) Representation on behalf of Workspace Management Limited

We write on behalf of Workspace Management Limited to make representations on the London Borough of Wandsworth's Local Plan (Regulation 19 version) which is out for public consultation. Our representations principally relate to:

- **Site Allocation: WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18 (Policies Map reference number: 99F)**

Background

Workspace Management Limited own the entirety of the Riverside Business Centre and Flip Out Building which forms the entire site allocation. The Council granted planning permission in 2020 (reference: 2018/4176) for a mixed-use development comprising 5 buildings ranging from 5 to 9 storeys in height to provide flexible business floorspace, assembly and leisure floorspace and 402 residential dwellings.

The adopted Employment and Industry document allocates the site (Site Allocation 99F) for a *'mixed use development including residential and economic uses. Redevelopment of the site should provide at least a 25% increase in the existing amount of industrial and office floorspace'*. The site is also designated as an Economic Use Intensification Area, which according to adopted Policy EI2 are areas which have capacity to provide intensified industrial uses and increased business floorspace and where residential uses will also be appropriate where this assists with developing more intensive economic uses.

Site Allocation: WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18 (Policies Map reference number: 99F)

Workspace are encouraged by the Councils decision to retain the site allocation WV1 (map ref:99F) within the Local Plan (Reg 19 version), however the changes to the wording of the site allocation is contrary to an approved scheme for the site and there is no evidence for the proposed changes. It is considered that the site allocation is not justified and is unduly restrictive.

Land use

The Site Allocation WV1 (Map ref 99f) amends the wording of the existing site allocation (99F) and states *'Mixed-use development including residential and economic uses. Redevelopment of the site should provide at least 50% increase in the existing amount of industrial and office floorspace'*. The new wording of the site allocation requires a significant uplift in existing commercial floorspace on the site going forward and an increase from 25% (adopted allocation) to 50% (new allocation).

The approved scheme was consented on the basis that the re-provision of existing plus a 25% uplift in existing office and industrial floorspace was being provided in line with the adopted site allocation and was deemed appropriate by the Council at the time of consent. Draft Policy LP37 states that for proposals in an Economic Use Intensification Area, proposals for mixed use developments including residential will be supported where; the provision of industrial floorspace will be fully re-provided or intensified. Draft Policy LP38 goes on to state that proposals which would result in the existing

quantum of office and industrial floorspace both being fully replaced will be supported. These policies therefore state that existing quantum of floorspace should be re-provided where a mixed-use development is proposed, the policy does not require a significant uplift in existing commercial floorspace where a mixed-use scheme is proposed.

It is considered that the requirement to re-provide and increase the existing industrial and office floorspace by a 50% increase is significant and is not justified by evidence. It must also be noted that this has not been viability tested and there is no evidence to state whether a mixed-use scheme could deliver a 50% uplift in existing office and industrial floorspace as well as achieve the other requirements of the site allocation, including significant public realm contributions, a riverside walk and a new footbridge.

	The provision of residential accommodation in this site allocation acts as an enabler of redevelopment. The residential accommodation is required to bring forward the redevelopment and uplift of light industrial/ commercial floorspace. The proposed wording which seeks 50% uplift will automatically result with a reduction of residential accommodation on the site to enable the additional commercial floorspace. Workspace have confirmed that this would not be viable.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The amendment to the wording of the site allocation WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18, to change the required increase in the existing amount of industrial and office floorspace from 25% (adopted Local Plan) to 50% has been made on the basis of the consented scheme (2018/4176). As set out in the Committee Report, the total existing economic floorspace is 9,570 sqm (NIA), and the proposed economic floorspace is 15,049 sqm (NIA). This provides an uplift of approximately 58%. The borough's evidence set out in the Employment Land and Premises Study identifies a significant need for industrial floorspace, as well as a need for office floorspace. This scheme therefore has the potential to make a significant contribution towards meeting that need, and the amendment to the site allocation therefore seeks to protect the quantum of economic floorspace secured via the consent.
Proposed Change	No change considered necessary.

Consultee Full Name	Workspace Management Ltd
Consultee Organisation Details	
Agent Full Name	Tiffany Mallen
Agent Organisation Details	Senior Planner Rolfe Judd
Comment ID	72
Title	Paragraph
Number	12.22
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Tall Building</i></p> <p>The draft site allocation states that the site is located within a mid-rise building zone MB-CI-02 and the maximum appropriate height for the zone is 6 storeys. The allocation states that 'the height of development within that zone should not exceed the heights of, and be in accordance with, the mid- rise building maps. Development proposals for tall buildings will not be supported.' Draft Policy LP4 states that buildings which are of 7 storeys or over or 21 metres or more from ground level will be considered tall buildings in Wandsworth.</p> <p>The amended site allocation would contradict the current planning permission for the site which was granted in 2020 (reference: 2018/4176). This planning permission approved a mixed-use scheme comprising of buildings ranging from 5-9 storeys in height and which provided a minimum of 25% uplift on the existing commercial uses. At the time of consent the Council considered the site to be appropriate for tall buildings. The amendments to the policy are therefore unduly restrictive and is contrary to the approved scheme for the site and no justification or evidence as to why the Council no longer consider this site suitable for tall buildings has been provided. This site allocation is therefore not justified and not based on proportionate evidence.</p> <p>In summary, the amended site allocation wording requires the developer to deliver a significantly larger uplift in existing office and industrial floorspace whilst also restricting the building heights on site to below 7 storeys without justification for reasoning or evidence that this would be viable. It is considered that Site Allocation: WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18 (Policies Map reference number: 99F) is unduly restrictive and unjustified.</p> <p>Workspace consider that the site allocation should remove the requirement to provide 50% uplift and revert to the adopted site allocation requirement of 25% uplift.</p> <p>Workspace consider that the site allocation must acknowledge that a tall building is considered appropriate on this site in line with the planning permission.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The Council's response on the requirement to provide a 50% uplift in economic floorspace is set out against comment #71.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Deborah Thackray
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	74
Title	BA1 Sainsbury's Car Park, Bedford Hill, SW12
Number	Statement 55
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>I would like to register my objection to the allocation of BA1 Sainsbury's Car Park, Bedford Hill, SW12 as residential/commercial/mixed use. The car park is currently effectively an open space in a very built up and increasingly busy area, with increasing traffic and no parks or play areas and few trees - and it lies in the heart of the local community. It is a breath of fresh air. Balham does not need additional commercial, cultural or community spaces - there are venues and shops that are not currently in use which can all be better made use of (reducing business rates for one or encouraging landlords to lower rent). Balham has increased footfall with more and more homes being built in the area, which is already densely populated, and residential housing would not either be appropriate; spaces in the local schools are over-subscribed and there is no space to build more schools or fit in more classrooms unless to the detriment of current school children. Of course, the council can squish in as many buildings as they wish into increasingly tiny areas - which we have already been seeing across the borough, with increasing numbers of cars due to increasing numbers of residents - and make money from this, with in effect zero accountability as any longer term resident is aware of, but it's not thoughtful, long-term planning and does not have the best interests of the community at heart. The increase in traffic is not acceptable given the already high levels of pollution in the centre of Balham. LTNs and cycle traffic ways have not been successful thus far. There needs</p>

	to be more planning for the good of the community. Wandsworth would do well to emulate French examples and build a park - which could too have money-making cafes or entertainment within that land but this would not be the predominant use - over the carpark and house the carpark underground. If there is not enough money to do this currently, at least don't allocate the land for the proposed purposes, because in the future there may be the opportunity to do this, or there may be better uses that could be agreed in consultation with local residents. As soon as it is allocated as such then developers will grab this land - as the council will inevitably approve their plans subject to their meeting basic conditions - and it will never be gained back. There is a reason why the UK has such low levels of happiness, particularly among young people and children, and declining mental health, as well as health problems caused by pollution. Community and the long-term well-being of residents is not at the forefront of planning. Building over this currently open area (which is being used!) would neglect all of these considerations, and be purely a short-term money-making opportunity.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The site is characterised by openness but it is not an open space.</p> <p>Any development on the site that would increase the number of young people would need to include as part of an application an education capacity assessment to ensure the existing catchment area could sustain the predicted growth or that mitigations would be put in place to support them.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mike Pendock
Consultee Organisation Details	Tarmac Trading Ltd
Agent Full Name	Joel Jessup
Agent Organisation Details	Heatons
Comment ID	75
Title	NE8 Silverthorne Road, SW8
Number	Statement 32
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	These comments are submitted on behalf of our client, Tarmac Trading Ltd (Tarmac), who operates Battersea Concrete Plant, Stewarts Lane, Nine Elms, SW8 3HE.

	<p>This letter aims to provide comments relating to potential implications on Tarmac operations at Battersea Concrete Plant. Our comments specifically relate to Change No. 49 (Amended Site Allocation) as listed on the Policy Map Changes Document (January 2022) and Policies SDS1 and LP34 of the Local Plan Publication Version.</p> <p>The Local Plan Publication Version proposes a new land use allocation for land which includes the Tarmac Concrete Plant within its boundaries. At present, the site is within an established 'Industrial Business Park' designation as established in the Local Plan Employment and Industry Document (LPEID) adopted in 2018. The Industrial Business Park allocation is now proposed to be removed. The Local Plan Publication Version instead proposes to include the Concrete Plant within the new "Battersea Design and Technology Quarter (BDTQ)".</p> <p>The BDTQ aims to establish a new creative and technological allocation consisting of three clusters: NE6, NE7, and NE8. The Tarmac Concrete Plant is within cluster 'NE8' of the BDTQ</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mike Pendock
Consultee Organisation Details	Tarmac Trading Ltd
Agent Full Name	Joel Jessup
Agent Organisation Details	Heatons
Comment ID	76
Title	Paragraph
Number	5.11
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Paragraph 5.11 of the Publication Version Local Plan states that it is the intention of the Local Plan to embrace the opportunity to:

"...transform the parts of the Queenstown Road, Battersea SIL composed of Havelock Terrace, Ingate Place, and Silverthorne Road into the Battersea Design and Technology Quarter (BDTQ). This seeks to leverage the 'Apple effect', and to build on the existing creative economy within the wider area to support the intensification of the existing industrial capacity by attracting a cluster of start-ups and micro-businesses in the creative, tech and digital sectors.."

Our client would like to express their support for the aspirational growth and development of the Borough as set out within the Local Plan Publication Version, including the development of the Battersea Design and Technology Quarter in which the Concrete Plant is located. Operations at industrial, mineral processing, and minerals infrastructure sites such as those at the Concrete Plant not only provide employment for the residents of the Borough, but are vital in the delivery of construction and infrastructure projects within the Borough and beyond. Overall, the principle of the BDTQ is supported, subject to consideration of comments relating to policy LP34 set out below.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.

Consultee Full Name	Mike Pendock
Consultee Organisation Details	Tarmac Trading Ltd
Agent Full Name	Joel Jessup
Agent Organisation Details	Heatons
Comment ID	77
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP34 'Managing Land for Industry and Distribution' refers to the protection and retention of land for industrial uses in Strategic Industrial Locations and Locally Significant Industrial Areas. Tarmac support the wording of Policy LP34, as long as the objectives of the BDTQ do not lessen the need to ensure the safeguarding of existing industrial uses. As a land use proposed to fall within the new BDTQ, the operation of the Concrete Plant should be as safeguarded as the site previously was when designated within an 'Industrial Business Park'. This would provide confidence to existing industrial occupiers that new development and the diversification of industrial areas will not unduly impact upon their abilities to run successful businesses.</p> <p>We wish to take this opportunity to state that paragraph 187 of the NPPF contains the 'agent of change' principle. It is acknowledged that the Local Plan Publication Version recognises the presence of the Concrete Plant (within subtext at paragraphs 5.70 and 18.37). However, given the importance of such mineral uses in the delivery of the wider objectives of the Local Plan, we consider that Policy LP34 provides an appropriate opportunity to include reference to the protection of minerals infrastructure sites.</p> <p>Planning policies within Local Plans have a duty to "safeguard existing, planned and potential sites for: bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material" as stated in paragraph 210e of the NPPF. The inclusion of specific protection for minerals infrastructure, such as Concrete Plants, is also specifically referred to in Minerals Planning Practice Guidance, as follows:</p> <p><i>"Planning authorities should safeguard existing, planned and potential storage, handling and transport sites to:</i></p> <ul style="list-style-type: none"> <i>ensure that sites for these purposes are available should they be needed; and</i> <i>prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes."</i> <p>(Paragraph: 006 Reference ID: 27-006-20140306)</p>

	<p>Therefore, we consider that the Local Plan Publication Version can be brought in accordance with national policy on this matter only through the inclusion of Policy wording aimed at preventing land use conflicts between sites such as the Concrete Plant at Stewart's Lane and other land uses. We consider that in order for the Local Plan to be consistent with national policy, appropriate protection should be afforded within the Local Plan to industrial uses wherever they are located, not just in identified Strategic Industrial Locations and Locally Significant Industrial Areas.</p> <p>We conclude that this can be resolved through the addition of specific wording relating to the protection of land uses such as the Concrete Plant from conflicting land uses in Policy/Policies within the Local Plan, rather than mentioned within the Plan's subtext.</p> <p>We trust that these comments are helpful. We would welcome opportunity to discuss the contents of this letter.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support noted.</p> <p>It is not the intention of the BDTQ designation to undermine the safeguarding of existing industrial uses, and in particular for those relating to industries that are traditionally considered appropriate for Strategic Industrial Locations, such as the manufacture of concrete and concrete products. As stated within the representation, it is for this reason that the site is specifically referenced in paragraphs 5.70 and 18.37. The Local Plan is considered to be consistent with the NPPF with respect to the safeguarding of existing, planned and potential sites for bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products, and the handling, processing and distribution of substitute, recycled and secondary aggregate material. These uses are considered to fall under the various uses identified in LP34.A, and their protection is set out in LP34.B.1. Parts C and D of the policy set out the protection for such uses outside of the designated SIL and LSIAs. For clarity, however, specific reference could also be made in LP34.A.5 to 'mineral infrastructure sites'.</p> <p>It is noted that any mixed-use development incorporating economic land must have regard to the requirements of LP37, part C.8 of which ensures regard for the agent of change principles as set out in the NPPF and in the London Plan, Policy D13.</p>
Proposed Change	<p>Amend LP34.A.5 as follows:</p> <p>"Secondary materials, waste management, <i>minerals infrastructure sites</i> and aggregates;"</p>
Consultee Full Name	Mike Pendock
Consultee Organisation Details	Tarmac Trading Ltd
Agent Full Name	Joel Jessup
Agent Organisation Details	Heatons
Comment ID	78
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	With regard to the Local Plan Publication Version, Tarmac supports the wording of Policy SDS1 'Spatial Development Strategy 2023-2038' which supports the general retention of existing employment sites and premises.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Toby Hopkins
Consultee Organisation Details	WCC Co-Ordinator Wandsworth Cycling Campaign
Agent Full Name	
Agent Organisation Details	
Comment ID	79
Title	Sustainable Transport
Number	20
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Thank you for the opportunity to comment on the second draft of the Local Plan ('Publication Version'). We understand that Wandsworth's Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. Collectively, the Borough's planning policies, strategies and guidance will set out

how the borough's neighbourhoods and places will change over the next 15 years. They therefore form a crucial element of whether (or not) the Borough of Wandsworth is able to deliver on Climate-Safe Streets, as a key part of Wandsworth's commitments to sustainability and tackling the Climate Emergency

With this in mind, I'm writing to you on behalf of Wandsworth Cycling Campaign to outline our concerns about the extent to which we observe developers being allowed to ignore democratically agreed Wandsworth policies. Our worry is that these are already prejudicing the delivery of existing Wandsworth policies (such as the Cycling Strategy and the Active Wandsworth Strategy, as well as Wandsworth Council's commitment to tackle the climate and biodiversity emergency as outlined in WESS) - and if allowed to go unchecked will seriously undermine the emerging Walking and Cycling Strategy.

We are keen to see a robust and transformative Walking and Cycling Strategy, one that will truly enable more Wandsworth residents and visitors to the borough to walk and cycle in comfort and safety, in and through Wandsworth, to the benefit of all and our environment. This requires the active support of the Council's Planning Department.

We cite two examples of current concern by way of illustration.

Battersea Power Station Development

We note the earlier (2018) announcement by the developers of a new cycling and walking route from Nine Elms to the River Thames, creating a family-friendly cycling connection to Battersea Park. This was very welcome and of course was linked to the planning permission for this major strategic riverside development in Battersea. However, as you may be aware, recently the developer has taken it upon themselves to ban cycling on the signed cycle route to Battersea Park via the river, enforced by security guards. It is very concerning to see a developer not complying with their planning permission, and extraordinary at this time, of all times, to see them seeking to restrict family-friendly cycling to one of the few green spaces in Battersea, and one which forms a vital refuge from motor traffic. As you will know, it is longstanding Wandsworth Council policy to enable walking and cycling access along the Thames riverside, and is incumbent on professionally qualified Council officers to ensure that this is enabled, both via design and enforcement.

Atheldene Development, Earlsfield

As you know, there were concerns during the planning permission process at the planned loss of permeability of this site, contrary to agreed Wandsworth Council policy. Maximising permeability of our streets for active travel, and enhancing permeability, are key - but no clear rationale has been given for the failure to achieve this in this instance. Most recently, the north end of Oakshaw Road at its junction with Swaffield Road has been closed off by the developers for walking and cycling. No prior warning for local people or indeed key stakeholders was given. This measure forms part of the last phase of redevelopment of the Atheldene scheme, does Wandsworth Council seemingly consider it acceptable to have this loss of amenity at such an early stage? No cycling diversion has been signposted, and the alternative walking route is poorly signposted and lit, as well as being made narrower by developer hoardings. One obvious consequence is that cyclists, including people attempting to cycle with children, are now expected to turn right northbound from Garratt Lane via the busy and dangerous crossroads into Swaffield Road. We suggest that walking/cycling access could have been maintained while enabling access to the developers, and that discussion with stakeholders such as WCC could have enabled a better outcome at this stage.

We note that the cycling 'mode filter' at the junction with Swaffield Road, which was very welcome, was one of the very few cycling permeability measures installed in the borough during the period 2014-2019. (Streeview image at: <https://tinyurl.com/ycx7zups>). It feels symbolic that even this small, low-cost, useful facility, has been removed, without consultation.

Conclusion

It is our impression that the relevant officers in the planning department in Wandsworth, for whatever reason, do not consistently ensure that Council policy is enacted in relation to active travel/healthy streets and that proper enforcement is in place. We do not know whether this is a result of a lack of awareness of the effects on active travel of disrupting existing networks and routes - or simply that officers are too overloaded to address what they may see as minor details in a scheme. As you can see, both the schemes themselves and the construction process - which can take many years - can generate concerns as a result of their introducing practical barriers to cycling (and walking).

We would love to see Wandsworth Council to show leadership on this issue. For example, in relation to Battersea Power Station development, for development control officers to make clear to the developers that it is longstanding Council policy to enable cycling along the River Thames as part of the Thames Path in London.

We are sorry to have to spend scarce volunteer time and energy on these matters. It is very dispiriting to have to fight over many years for gains, only to see them whittled away in planning-led schemes. At this time, of all times, we should not be going backwards on active travel provision.

In general terms, we observe patchy adherence during construction works and street works in the Borough of Wandsworth to existing TfL guidance [See 'Temporary Traffic Management handbook- Keeping people safe at roadworks' available from:<https://tinyurl.com/yc5cbzxe>]. We would like the Local Plan to ensure that this guidance, which represents best practice, is followed, since this forms a useful tool in enabling active travel to continue during works. We need to move away from a situation where the amenity and safety of people cycling and walking is often overlooked during works to one where people cycling and walking are treated as VIPs as a matter of course.

We stand ready to work with Wandsworth Council to do what we can as local residents with a commitment to enabling active travel and healthy streets to be introduced across our borough. We would emphasise that any Strategy or Plan stands or falls on the capacity of professional officers to implement it; and we have highlighted instances where we think this needs to be addressed by the Council. We look forward to seeing a final version of the Local Plan which ensures that Wandsworth Council plays its part to the maximum extent possible in delivering neighbourhoods and places which enable people to travel sustainably in and through the borough of Wandsworth.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	This comment is considered not to relate to the Local Plan. Decisions relating to planning applications are taken considering the Plan as a whole. The Enforcement Team are responsible for investigating a breach of a planning consent.
Proposed Change	No change considered necessary.
Consultee Full Name	Ballymore Group
Consultee Organisation Details	Ballymore Group
Agent Full Name	Helena Burt
Agent Organisation Details	Planner Rolfe Judd Planning
Comment ID	80
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>We write to make representations on the London Borough of Wandsworth's Local Plan Review – Regulation 19 Version. The representation has been prepared both on a Borough wide review as well as in relation to site-specific comments and build on our comments in the previous consultation.</p> <p>Within this positive context our comments relate solely to the proposed site allocation for the Kirtling Wharf Cluster. Our comments on this topic are set out below:</p> <p>As you will be aware, Ballymore has significant development landholdings within the Borough. Ballymore is nearing completion of the Embassy Garden Scheme in Nine Elms which once completed will deliver up to 1,750 residential units and circa 45,000 sqm of commercial and retail space. Ballymore also has other land holdings and options within the area with the potential future development. They are therefore intrinsically interested in the policy direction for this area and the Wider Borough.</p> <p>Below we have provided a response to the details within the Regulation 19 Version we consider are the most important concerning development within the Borough.</p>

In summary, we strongly support the continuing emphasis on housing delivery within the Borough especially given the emerging need to deliver substantially more homes. We are also pleased to see that the Council has worked proactively with stakeholders to amend and improve the plan following the initial consultation. We are especially pleased to see the resolution of many areas of conflict with the New London Plan.

On this basis we write to confirm our support of the following changes:

- Nine Elms Area Strategy – We support the amended approach to ground floor retail uses noting that flexibility should now be applied at ground floors. We are also pleased to see meanwhile uses are now actively supported in retail units so long as they meet the cultural strategy for the area.
- Policy LP3 Historic Environment – We are pleased to see the Council have agreed with our proposed revisions to the demolition in conservation areas policy.
- Policy LP4 Tall Buildings – We support the Council in adopting the London Plan approach to height which would support this area for tall buildings subject to detailed design. We also appreciate the clear definition of tall buildings within the Borough.
- Policy LP29 Dual Aspect – We support the policy amendments to remove reference to main roads.
- Policy LP43 Safeguarded Wharf – We strongly support the updates to reflect the London

Plan Approach and allow consolidation of wharves subject to capacity retention.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Katie Parsons
Consultee Organisation Details	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation Details	
Comment ID	82
Title	Achieving High Quality Places and Design Excellence
Number	14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Thank you for your notification of the above consultation. As the Government's adviser on the historic environment. Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity on the draft document.</p> <p>Historic England Advice</p> <p>The Regulation 19 plan represents heritage well throughout and provides a good framework for its management. We welcome the design and character-led approach to determining site capacity. This aligns with the London Plan and its draft guidance. Suitable SA objective relating to heritage have been included to assess the likely impacts of the allocations. We have provided some detailed comments in Appendix 1 below. The plan is based on a robust evidence base and makes appropriate reference to the supporting studies throughout. We consider the plan to be sound subject to some minor amendments set out in Appendix 1.</p> <p>Conclusion</p> <p>Finally, we should like to stress that this opinion is based on information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> <p>I hope that these comments will be helpful. I am happy to comment on any evidence document or assessment methodologies before the next version of the plan is published.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted
Proposed Change	No change required

Consultee Full Name	Katie Parsons
Consultee Organisation Details	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation Details	
Comment ID	83
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Appendix 1 Site Allocations:</p> <p>The site allocations are better set out in the plan and it is easier to navigate as a result. The allocations are developable in principle, we advise to make sure all heritage assets within and near-by are identified in the allocation policies. We are pleased to see that the allocations reflect the findings of the revised Urban Design Study which will be an important document to consider when making planning decisions.</p> <p>The improved tall and mid-rise buildings policy will provide a good set of parameters for the development of the allocations and provides a clear framework for their delivery.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Heritage assets for each site allocation are captured in the site allocation methodology paper and any significant development considerations they may have on the site allocation have been included within the Local Plan site allocations.
Proposed Change	No change considered necessary.
Consultee Full Name	Katie Parsons
Consultee Organisation Details	Historic Environment Planning Adviser Historic England
Agent Full Name	

Agent Organisation Details	
Comment ID	84
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP4 tall and Mid-Rise Buildings</p> <p>The plan contains a major shift from the regulation 18 version in how tall buildings are being approached. The shift to a hierarchical approach of tall, and mid-rise is helpful, and the definitions are sensible. This approach is based on the Urban Design Study and helps emphasise that mid-rise buildings can deliver high density development. Some specific comments are:</p> <ul style="list-style-type: none"> • Parts B, C, and D of the policy provide more clarity as to where tall buildings can go and contains a new reference to need to consider cumulative effects. We support this amendment which brings the plan more in line with the London Plan. • Part F includes a new provision for mid-rise buildings and makes improved reference to the Urban Design Study. We support this amendment. • Part G again provides additional clarity to help applicants and decision makers. • New figure 14.1 is helpful and adds clarity. • The policy overall makes better links to urban design study which will add weight to it as a factor in decision making. • Some of the height parameters in Appendix 2 are very wide. We appreciate that this is guided by the colour grading but perhaps another link could be made to the Urban Design study here and a character-led approach at 23.15.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. The approach to para 23.15 is considered to be sound, however to assist the reader, as suggested, a change to add wording to show links to the UDS is proposed to paragraph 23.15.
Proposed Change	Amend paragraph 23.15 to read: “The below maps should be read in conjunction with Policy LP4 (Tall and Mid-rise Buildings). The maps show the locations of tall and mid-rise building zones, and appropriate height (ranges) for each zone. <i>Further detail for each zone is set out in the council's Urban Design Study (2021)</i> ”.
Consultee Full Name	Katie Parsons
Consultee Organisation Details	Historic Environment Planning Adviser Historic England

Agent Full Name	
Agent Organisation Details	
Comment ID	85
Title	LP3 Historic Environment
Number	Policy 14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP3 Historic Environment</p> <p>This is generally a robust policy and reflects the tests set out in the NPPF. Part I is a new addition on climate change adaption but there is no supporting text in relation to this criterion. It would be helpful if this was addressed in the supporting text. It would suffice to make links to the climate change chapter if that is a referable route, otherwise the criterion sits conspicuously within the policy.</p> <p>The new table of local views is welcome, but it would be helpful to explain in the text whether or not there have been any changes to these since the adoption of the current plan as a result of decision that have been made.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Policy LP3 Historic Environment is considered sound, however further background text could be added to help clarify and address part I of the policy.
Proposed Change	<p>Amend wording to include new paragraph to be added after 14.23;</p> <p><i>'Climate change will result in more extreme weather events and urban heating. The council is committed to ensuring that all building alterations and extensions deliver good design and respond to climate change through mitigation and adaptation measures which are set out further in LP 10 Responding to Climate Change.'</i></p>

Consultee Full Name	Katie Parsons
Consultee Organisation Details	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation Details	
Comment ID	86
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP10 Responding to the Climate Crisis</p> <p>WE welcome the inclusion of policies to address climate change. We advise that the plan highlights the risk of maladaptation as this make emissions worse, impact upon human health, can increase fuel poverty if buildings becoming less efficient as a result, as well as being harmful to heritage.</p> <ul style="list-style-type: none"> • Part G <i>Retrofitting of existing buildings, through the use of low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported.</i> This criterion should make reference to the risks posed by maladaptation. It is important the policy supports the right retrofit and adaption of buildings rather than any retrofit or adaptation. • 10 talks about a conflict between conservation and retrofit, we advise that this wording is amended to reflect nuance. The two goals are compatible, it is entirely possible to retrofit/improve the performance of any building, including historic buildings, and it is unhelpful for the plan to suggest that there is a conflict. • When considering the potential depth often required for ground source heat pumps it would be helpful to make reference to the potential for archaeology to be affected. There are also a large number of underground structures in London e.g. tube tunnels, basements, sewer tunnels that might prevent ground source heat pumps being installed. • We welcome recognition that overheating is the main issue facing London. • Carbon offset should be a last resort and we suggest this is mentioned in the plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. It is important to highlight that there are risks with maladaptation which can cause significant harm and therefore wording could be added to LP 10 G to reflect this.</p> <p>Comment noted. The Council considers that wording could be added to clarify that retrofit and historic buildings are indeed possible but just to caveat where any issues do arise what the policy expects. Wording could added to LP 10 G.</p>

	<p>Comment agreed. In order to highlight that Ground Source Heat Pumps can cause sometimes have potential issues with archaeology wording could be added to the background text at para 15.10</p> <p>Comment noted. The Council is committed to reducing carbon emissions and the main aim is to deliver those savings on site. Therefore it could be emphasised in the plan that carbon offset fund contributions are as a last resort. Wording could be added to LP 10.C.4</p>
Proposed Change	<p>Amend policy to include wording to Policy LP10.G as follows:</p> <p>'.....Retrofitting of existing buildings, through the use of low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported. <i>However, there are risks of maladaptation and it is important that right retrofit and adaptation of buildings is undertaken.</i>'</p> <p>Wording to be added to Policy LP 10 para 15.10 as follows;</p> <p><i>'It is entirely possible to retrofit/ improve the performance of any building, including historic buildings. However, in some circumstances where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of the heritage asset, in accordance with the NPPF, the London Plan and the Council's planning policies.</i></p> <p>Wording to be added at LP 10 para 15.15 as follows;</p> <p>'.....Renewable technologies such as photovoltaic cells, solar panels, ground and air source heat pumps and other forms of renewable energy are likely to be appropriate in many parts of the borough, subject to other policies within this Plan. <i>When considering the potential depth often required for ground source heat pumps the potential for archaeology to be affected must be taken into account.</i>'</p> <p>Wording to be added to LP10.C.4</p> <p>'4. In exceptional circumstances, where it is clearly demonstrated that the on-site percentage threshold targets listed in Parts C.1 and C.2 above cannot be fully achieved, <i>as a last resort</i>, any shortfall must be addressed by making a financial contribution to the Council's Carbon Offset Fund'</p>
Consultee Full Name	Katie Parsons
Consultee Organisation Details	Historic Environment Planning Adviser Historic England
Agent Full Name	
Agent Organisation Details	
Comment ID	87
Title	LP11 Energy Infrastructure
Number	Policy 22
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	LP11 Energy Infrastructure It might be helpful to consider area-based solutions as well as building by building solutions, e.g. shared energy sources for new development.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. LP 11 Energy Infrastructure has been modified to refer to the London Plan Energy Hierarchy which considers different energy sources.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Patrick Clearwater
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	88
Title	LP9 Advertisements
Number	Policy 20
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	[1] Policy LP9 (Advertisements) should, as well as LP8 (Shopfronts), note that shop and building signs are required to display a building name or street number. While this is a Wandsworth Council requirement, as set out in the attached 'Naming and Numbering of Buildings' regulations, this is not enforced. A note in this policy would encourage applicants to include this in advertisement applications, as it is through this process that building name and street numbers are typically provided. It would also encourage development management officers to request this through the application process or include an informative on the decision notice that this is a requirement. The inclusion of a building name or street number is related to amenity, as clear identification of street addresses assists in wayfinding, which adds to the amenity of an area. It contributes to the general efficient functioning of urban areas—with clear addressing assisting visitors, delivery services and the general public and forming part of what makes a place well designed. It is therefore appropriate that such a note be included in this policy in the local plan.

Change(s) considered necessary	[1] Amend LP9 (Advertisements) by adding to part A. an additional criterion after 'New advertisements (including shop signage) and hoardings must': 'display the property numbers of the shop and any other accommodation'.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The requirement to display shop numbers is already set out in Policy LP8 A. 5. and should not be replicated.
Proposed Change	No changes considered necessary.
Consultee Full Name	Mr Patrick Clearwater
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	89
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Effective
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>[2] Policy LP1 (The Design-Led Approach) or section 9 (Open Space) of the Planning Obligations supplementary planning document should set out that public open space created with new development, once formed, landscaped and furnished, shall be vested in the Council and be true public space, rather than being held in the ownership of the developer and privately managed.</p> <p>Open space that is privately owned and managed in the borough does not create welcoming spaces that are available to all. It is common to see signs stating 'private land' and with a long list of conditions and restrictions on the use of the space. For example, no sitting on the grass, no dogs, no smoking, no loitering, no skateboarding, no cycling. If the community wants these restrictions in place, then they should have a say in that, through the Council being the owner and manager of the space. Sometimes the design of the open spaces can be subtly controlled to reduce its attractiveness to people or people that don't live in the development surrounding it. If it were in the control of the Council, adjustments can be made over time to the design and functioning of the space, to correct these problems, whereas if it's privately owned, the design cannot change without the landowner's consent.</p> <p>Open space is a limited and important resource, and if it is to fulfill its functions it should be owned and managed by the Council.</p>
Change(s) considered necessary	[2] Amend LP1 (The Design-led Approach), part A.7. to: 'Include well-located public spaces that support a wide variety of activities, and provide a high-quality public realm, satisfying the criteria set out in London Plan Policy D8, which will, after their formation, landscaping and furnishing, be vested in and managed by the Council'. In addition, amend section 9.3 of the Planning Obligations supplementary planning document to include an additional point to the list of 'General principles': 'Open space will, after its formation, landscaping and furnishing, be vested in the Council'.

Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comments noted. LP20 New Open Space sets out that privately-owned public open spaces (POPs) which meet the Draft Public London Charter and future drafts will be considered. The Council considers that this position on open space management is suitably flexible and appropriate for the borough. The Councils contractual obligations regarding the management of open space are not considered to be appropriate for consideration in the Plan. Open spaces are managed both publicly and privately and it is policy that lies outside of the planning department's remit that governs the way open space is managed and maintained.
Proposed Change	No change considered necessary.

Consultee Full Name	Richard Brown
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	90
Title	BA1 Sainsbury's Car Park, Bedford Hill, SW12
Number	Statement 55
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>I'd like to comment on the Wandsworth Local Plan</p> <p>Re Balham Site BA1 Sainsbury's car park</p> <ol style="list-style-type: none"> 1 .10.14 – it's not clear what is a "car park in ground floor podium"; this needs clarifying using simpler language 2 .10.16 – it's not clear what size the car park will be; this needs to be clarified relative to the current car park space 3 .10.17 – reference is made to car club provision but no comment is made to regular public parking; this needs clarifying and confirmation that public parking of a similar size to the existing car park will be provided. 4 .If, as I suspect, the intention is to eliminate the public car park, all that will mean is that footfall in Balham centre shopping areas will fall and the public will drive further afield to places such as Savacentre in Colliers Wood for their regular shopping – thus increasing congestion and environmental impact in those areas. 5 .I am against further development of the site unless confirmation is provided that a public car park will be provided of an equal size
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>Ground floor podium parking is parking that is slightly below or underneath a building.</p> <p>Car parking will be reduced to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels.</p> <p>Detailed provision of the amount and type of parking (including car club parking) will be made available with any proposal for development of the site.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Michael Atkins
Consultee Organisation Details	Senior Planning Officer Port of London Authority
Agent Full Name	
Agent Organisation Details	
Comment ID	91
Title	WT11 Western Riverside Waste Transfer Station, SW18
Number	Statement 11
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Allocation WT11: Western Riverside Waste Transfer Station</p> <p>Given the sites safeguarded status, and the recent confirmation of Ministerial Safeguarding Directions (2021) for this wharf, the site allocation must be focused on the protection and maximisation of use of the site as a safeguarded wharf during the plan period rather than as a potential housing allocation. Therefore, it is recommended that the reference in section 4.105 to potential decommissioning is removed.</p> <p>As part of paragraphs 4.101 - 4.102 and the need for development to ensure there are no conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf, it must be specifically highlighted that the safeguarded wharf can operate over 24 hours a day in line with tidal movements, and this must be taken into consideration as part of the design of any future development, in line with the Agent of Change principle.</p> <p>There must also be a specific link in the allocation to policy LP40 (Protected Wharves) as part of the site description due to the strong links between the policy and allocation.</p>
Change(s) considered necessary	<p>1 - Allocation WT11: Western Riverside Waste Transfer Station</p> <p>Recommended that the reference in 4.105 to potential decommissioning is removed.</p> <p>Insert the following into paragraph 4.102: " Any proposal would need to demonstrate that the addition of residential dwellings would not compromise the operation of the adjacent wharf, which can operate over 24 hours a day in line with tidal movements, in line with the Agent of Change principle."</p> <p>There must also be a specific link in the allocation to policy LP40 (Protected Wharves) as part of the site description due to the strong links between them.</p>
Wishes to attend Hearing Session	

Reason why	At this stage the Port of London Authority wish to reserve the right to potentially speak at the hearing sessions, to ensure that the boroughs safeguarded wharves are appropriately protected and promoted throughout the Local Plan over the plan period.
Council Response	<p>Comment noted.</p> <p>Paragraph 4.105 is considered sound as LP40 Safeguarding Wharves sets out the conditions for when redevelopment of a safeguarded wharf would be appropriate and should be read with the site allocation.</p> <p>Paragraph 4.102 is considered sufficient and clear and does not suggest that the safeguarded wharves do not operate 24 hours a day and is considered sound. Please note that wording referencing the 24-hour operation of wharves is proposed to be added to LP40 Safeguarding Wharves in response to the Port of London Authority's comment #93 (under the Nine Elms Area Strategy section).</p> <p>The Agent of Change principle is referenced within Policy LP40 Safeguarding Wharves. It is not necessary to repeat it within the text of the Allocation as the Local Plan must be read as a whole. However, it is considered helpful to add reference to LP40 to the need for 24 hour working.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Michael Atkins
Consultee Organisation Details	Senior Planning Officer Port of London Authority
Agent Full Name	
Agent Organisation Details	
Comment ID	92
Title	WT22 Pier Wharf, SW18
Number	Statement 22
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Allocation WT22: Pier Wharf</p> <p>As noted in the PLA's previous response, it is considered that the allocation should focus on the protection and maximisation of use of the site as a Safeguarded Wharf during the plan period rather than as a potential housing allocation if the wharf is de-designated. This must be reflected in paragraph 4.171 of the Local Plan.</p>
Change(s) considered necessary	<p>2 - Allocation WT22: Pier Wharf</p> <p>Paragraph 4.171 of the Local Plan should be amended to state the following</p>

	"The site is currently used as a concrete batching plant on a safeguarded wharf. This use is in line with the sites safeguarded status and will continue to be supported."
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	At this stage the Port of London Authority wish to reserve the right to potentially speak at the hearing sessions, to ensure that the boroughs safeguarded wharves are appropriately protected and promoted throughout the Local Plan over the plan period.
Council Response	<p>Comment noted. It is agreed that this proposed language would improve upon the current reference to the 'strategic role'. The site description should not set out which uses should continue to be supported, however; the continuation of the use as a 'safeguarded wharf' is already set out in the allocation.</p> <p>A corresponding change should be made to Site Allocation WT11 Western Riverside Waste Transfer Station, SW18, to make reference to the safeguarded status of the wharf within the site description. This should be read alongside amendments proposed in response to the Western Riverside Waste Authority, comment #362.</p>
Proposed Change	<p>Amend paragraph 4.171 as follows:</p> <p>"...The site is currently used as a concrete batching plant on a safeguarded wharf. The current <u>This use is in line with</u> of the site's <u>safeguarded status</u> provides an important strategic role."</p> <p>Amend paragraph 4.11 as follows:</p> <p>"...which utilises its riverside position and <u>safeguarded</u> wharf facilities for bulk transportation..."</p>
Consultee Full Name	Michael Atkins
Consultee Organisation Details	Senior Planning Officer Port of London Authority
Agent Full Name	
Agent Organisation Details	
Comment ID	93
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy PM3: Nine Elms</p> <p>Within the 'draft Local Plan Consultation Statement Appendix five' document the following changes were proposed to policy PM3 under the Placemaking section:</p>

	<p>"Development proposals within this location should maximise the opportunity for the creation of green/open space that the Tideway Tunnel access shaft presents, contribute to the creation of a positive arrival experience for pedestrians and cyclists using the bridge, and improve walking and cycling connectivity in line with the VNEB Cycling Strategy, while also retaining Kirtling Wharf as a safeguarded zone for waterborne freight handling in line with LP 43."</p> <p>It does not appear that this has been carried over into the latest draft Local Plan wording. It is therefore considered that similar wording must be included in policy PM3 to emphasise the safeguarded wharves (Cringle Dock, Kirtling Wharf and Middle Wharf) and their importance for Wandsworth and London as a whole. This is considered essential as the PLA noted in its previous response that it would strongly object to any proposed change in designation here, particularly at Kirtling wharf as the site is safeguarded for waterborne freight cargo handling and the PLA would object to all or part of the site being lost for alternative uses. As the owner of the riverbed and given its role as the statutory harbour authority for the River Thames the PLA would not support a river crossing located in an area that could negatively affect the long term viability of one of the boroughs key safeguarded wharves and potentially constrain navigation.</p> <p>In addition, in order for the policy to be found fully sound, there must also be a specific reference in the policy itself that any development here will be designed in line with the Agent of Change principle, to ensure that existing and potential wharf operations (which can operate over 24 hours a day) are fully protected and the long term use and viability of these sites not compromised.</p>
Change(s) considered necessary	<p>3 - Policy PM3: Nine Elms</p> <p>The following wording should be included in policy PM 3 under the Placemaking section:</p> <p>"Development proposals within this location must ensure that the safeguarded Cringle Dock, Kirtling and Middle Wharves are retained for waterborne freight handling uses in line with policy LP40. Development Proposals within Nine Elms will be designed in line with the Agent of Change principle, to ensure that existing and potential wharf operations, which can operate over 24 hours a day in line with tidal movements are fully protected and the long term use and viability of these sites not compromised."</p> <p>In addition the Safeguarded wharf boundaries must be highlighted on map 5.3 (Spatial Area Map: Kirtling Street Cluster) under the transport infrastructure section.</p>
Wishes to attend Hearing Session	<p>Yes, I wish to participate in hearing session(s)</p>
Reason why	<p>At this stage the Port of London Authority wish to reserve the right to potentially speak at the hearing sessions, to ensure that the boroughs safeguarded wharves are appropriately protected and promoted throughout the Local Plan over the plan period.</p>
Council Response	<p>Comment noted. Due to an administrative error this change from the Reg18 Consultation was not brought forward. Comments relating to the open space connecting the Nine Elms Pimlico Bridge were moved to the Kirtling Street Cluster site allocation, under 'development considerations' (see paragraph 5.30 in the Publication Local Plan). The Council's response and proposed amendments are set out against the Port of London Authority's comment #95. Please also see the Council's response to the Western Riverside Waste Authority comment #361 and the Thames Tideway comment #536, which also address this issue.</p> <p>The Agent of Change principle is referenced within Policy LP40 Safeguarding Wharves. It is not necessary to repeat it within the text of the Area Strategy as the Local Plan must be read as a whole. However, it is considered helpful to add reference to this policy to the need for 24 hour working.</p> <p>The safeguarded wharves are identified on the Policies Map which supports the Local Plan. That notwithstanding, it is considered appropriate that Map 18.1 Economic Land should be amended to include the safeguarded wharf sites. This is the appropriate location as it provides context for Policy LP40 Safeguarding Wharves, which is also in chapter 18.</p>
Proposed Change	<p>Amend paragraph 18.87 as follows:</p> <p>"...Development of sites that are adjacent or in close proximity to the wharves must be designed to minimise the potential for conflicts between the effective operation of the wharves (<i>which can occur over a 24-hour period</i>) and the new land use, and the Agent of Change principle will apply as set out in the London Plan Policy D13".</p>

Amend Map 18.1 Economic Land to include the safeguarded wharf sites.

See Appendix 1 for visualisation of mapping changes.

Consultee Full Name	Michael Atkins
Consultee Organisation Details	Senior Planning Officer Port of London Authority
Agent Full Name	
Agent Organisation Details	
Comment ID	94
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy PM9: Wandsworth Riverside Map 11.1 must be updated to reflect the areas Safeguarded Wharves as part of the importance designations for this area.
Change(s) considered necessary	5 - Policy PM9: Wandsworth Riverside Map 11.1 must be updated to reflect the areas Safeguarded Wharves to ensure the importance of these designations are appropriately highlighted.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	At this stage the Port of London Authority wish to reserve the right to potentially speak at the hearing sessions, to ensure that the boroughs safeguarded wharves are appropriately protected and promoted throughout the Local Plan over the plan period.
Council Response	The safeguarded wharves are identified on the Policies Map which supports the Local Plan. It is noted that the Council's response to the Port of London Authority's comment 93 (under Nine Elms) suggests that the safeguarded sites were added to Map 18.1 Economic Land. This is the appropriate location as it provides context for Policy LP40 Safeguarding Wharves, which is also in chapter 18.
Proposed Change	Amend Map 18.1 Economic Land to include the safeguarded wharf sites. See Appendix 1 for visualisation of mapping changes.
Consultee Full Name	Michael Atkins
Consultee Organisation Details	Senior Planning Officer Port of London Authority

Agent Full Name	
Agent Organisation Details	
Comment ID	95
Title	NE9 Kirtling Wharf, Nine Elms, SW8
Number	Statement 26
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Allocations NE9: Kirtling Wharf and NE11: Cringle Dock</p> <p>It is considered essential that these allocations consistently highlight the need for the safeguarded wharves to continue to be able to operate over 24 hours a day, in line with tidal movements, to ensure that the long term use and viability of these sites are not constrained in line with London Plan policy SI15. Therefore as part of the allocation wording it must be emphasised that future additional uses such as residential will have full regard to the current and future operation of the safeguarded wharves, including as part of the design of outdoor amenity space, balcony design and internal noise levels.</p> <p>As part of this within the 'draft Local Plan Consultation Statement Appendix five' document for these allocations it is stated that any proposals for open space would be expected to not interfere with the safeguarded wharves in line with the policies that have been set out to protect them. It is therefore proposed that this wording is included as part of these allocations. The allocation must also include a specific link to associated policy LP40 (Protected Wharves) to ensure the strong links between this allocation and policy LP40 are made fully clear.</p> <p>In addition, paragraphs 5.25 and 5.26 must specifically highlight that the allocations included safeguarded wharves within site allocation boundaries.</p>
Change(s) considered necessary	<p>4 - Allocations NE9: Kirtling Wharf and NE11: Cringle Dock</p> <p>Recommend the following amendments to the proposed allocations:</p> <p>Paragraph 5.25: NE9: This site is south of the River Thames, abutting the shoreline, and west of NE2 and includes the safeguarded Kirtling Wharf. To the south the site is Cringle Street, and it is east of NE11.</p> <p>Paragraph 5.26: NE11: This site is south of the River Thames and abuts onto the shoreline and is west of NE9. The site includes the Safeguarded Cringle Dock. To the south of the site is Cringle Street and to the west is Battersea Power Station (NE14).</p> <p>Paragraph 5.27:</p>

	<p>"Proposals for mixed-use development must retain or enhance wharf capacity and operability and maintain appropriate access arrangements. Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharves which can operate for over 24 hours a day in line with tidal movements".</p> <p>Paragrph 5.30 (Open Space):</p> <p>"Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to consider open space that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft without affecting the long term use and viability of the areas safeguarded wharves for waterborne freight cargo handling, in line with policy LP 40 (Protected Wharves) and the London Plan."</p>
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	At this stage the Port of London Authority wish to reserve the right to potentially speak at the hearing sessions, to ensure that the boroughs safeguarded wharves are appropriately protected and promoted throughout the Local Plan over the plan period.
Council Response	<p>Comments noted.</p> <p>It is agreed that the site allocation descriptions should reference the safeguarded status of the wharves. This should also be included for NE10 Middle Wharf.</p> <p>Paragraph 5.27 is considered sufficient and clear and does not suggest that the safeguarded wharves do not operate 24 hours a day and is considered sound. Please note that amendments are suggested on this issue in response to the Port of London Authority's comment #93.</p> <p>It is considered that the site allocation is sound, however, additional detail could be included to clarify that new uses do not harm the safeguarded wharf designations. Please also see the Council's response to the Western Riverside Waste Authority comment #361 and the Thames Tideway comment #536, which also address this issue.</p>
Proposed Change	<p>Amend the wording to Para 5.25 as follows:</p> <p>"NE9: This site is south of the River Thames, abutting the shoreline, and west of NE2. To the south the site is Cringle Street, and it is east of NE11. <i>The site includes the safeguarded Kirtling Wharf.</i>"</p> <p>Amend the wording to Para 5.26 as follows:</p> <p>"NE11: This site is south of the River Thames and abuts onto the shoreline and is west of NE2. To the south of the site is Cringle Street and to the west is Battersea Power Station (NE14). <i>The site includes the safeguarded Cringle Dock.</i>"</p> <p>Amend the wording to Para 5.80 as follows:</p> <p>"...to the west and, to the east, Elm Quay Court and a small area of open space. <i>The site includes the safeguarded Middle Wharf.</i> "</p> <p>Amend wording to Para 5.30 as follows:</p> <p>'5.30 Open Space - Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide appropriate open space that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and the Thames Tideway Tunnel access shaft. It will need to consider the Nine Elms Pimlico Bridge structure, its future access and</p>

	<p>maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge. <i>Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.</i></p>
Consultee Full Name	Michael Atkins
Consultee Organisation Details	Senior Planning Officer Port of London Authority
Agent Full Name	
Agent Organisation Details	
Comment ID	96
Title	LP49 Sustainable Transport
Number	Policy 60
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP49: Sustainable Transport</p> <p>In principle support policy LP51, which states that the Council will support proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users and part B4 which promotes safer, less polluting and more efficient freight movement. As part of this it is considered that specific reference is given to the potential increased use of the river as part of the policy, both for passenger and freight transport.</p>
Change(s) considered necessary	<p>6 - Policy LP49: Sustainable Transport</p> <p>Specific support must be given to the potential increased use of the river as part of the policy, both for passengers in part B1 and waterborne freight cargo handling in part B4.</p>
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	At this stage the Port of London Authority wish to reserve the right to potentially speak at the hearing sessions, to ensure that the boroughs safeguarded wharves are appropriately protected and promoted throughout the Local Plan over the plan period.
Council Response	Comments noted. LP49 Sustainable Transport is considered sound as it does not prevent the increased use of the river for passenger and freight transport, however, it is considered that an amendment might add clarity to what the policy aims to come forward.
Proposed Change	<p>Amend wording in Policy LP49 Sustainable Transport to read:</p> <p>'4. freight movement, <i>including waterborne freight cargo handling</i>, is made safer, less polluting and more efficient including through the use of Urban Logistics Hubs in suitable locations;</p>

	<p>Amend wording in paragraph 20.9 to read:</p> <p>'20.9 Reducing the need to make unnecessary non-active travel journeys is the most sustainable outcome and this is encouraged. Sustainable transport modes include any efficient, safe and accessible means of transport with overall low impact on the environment, primarily walking ,cycling, and public transport <i>including passenger river boats.</i>'</p>
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	97
Title	Paragraph
Number	2.59
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Spatial Vision and Strategic Objectives</u></p> <p>We support the references in the vision (pages 20-22) to health and wellbeing and working with key partners, such as the NHS to invest in public services (13th bullet point) and supporting healthy lifestyles (20th bullet point).</p> <p>We welcome the change to Social Objective No 7 which seeks to ensure the creation of healthy environments and developments ensuring there is an appropriate range of health and care facilities that meet local needs and support service transformation.</p> <p><u>Spatial Strategy</u></p> <p>We are pleased to see that health and wellbeing forms part of the spatial strategy. In addition to the NHS Long Term Plan, paragraph 2.100 now refers to Wandsworth Health and Care Plan and the wider service and estate plans for the emerging South West London Integrated Care System and Integrated Care Board (SWL ICB).</p> <p>Paragraph 2.102 refers to the potential health and wellbeing benefits from development. However, development can also have negative impacts if not well designed and managed. We note that paragraph 2.64 refers to the need to ensure that environmental impacts of development do not lead to detrimental effects on peoples' health. We suggest that the paragraph 2.102 refers to the use of health impact assessments (as required under Policy LP15).</p> <p>Amend the first sentence to read: The quality of the built <u>and natural</u> environment can have a significant impact on health and well-being <u>and the use of health impact assessments can help ensure that the impact of new development is addressed.</u></p> <p>We welcome the change to Policy SDS1 Spatial Development Strategy with the inclusion of housing capacity figures for 2023 – 2038 for each of the Area Strategies and on allocated sites outside of these areas, and on small sites across the borough. We note that Policy LP24 Provision of New Homes in the Regulation 18 version has been deleted. This policy and Table 17.2 provided 5- and 10-year supply figures. Given that 87% of capacity is the first 10 years of the plan (by 2032/2033), this information is helpful.</p>

	Indeed the B. 1 'Inclusive Growth' clause of the area strategy policies provide 10-year housing capacity figures. It would be helpful if the Policy Table 2.2 New Home Distribution as part of Policy SDS1 included 10-year housing capacity figures to match the figures in the area strategy policies.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Local Plan should be read as a whole. LP15 sets out the requirement to provide a Health Impact Assessment, it is considered unnecessary to cross reference this requirement within paragraph 2.102.</p> <p>The Areas Strategies deal with a ten year supply, whilst SDS1 deals with the whole of the plan period. The numbers are different for this reason, but are related to one another. There is no need or reason to put the ten-year figure into SDS1.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	98
Title	Paragraph
Number	16.17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Infrastructure Delivery Plan</p> <p>We welcome the new clause H in Policy SDS1 Spatial Development Strategy which requires development proposals to demonstrate that they accord with infrastructure requirements established through the Infrastructure Delivery Plan and all other policies of the Local Plan.</p> <p>We note that an updated Infrastructure Delivery Plan (January 2022) has been published as part of the consultation. It includes a review of health infrastructure, a description of planned health Infrastructure provision in Nine Elms and health projects and requirements set out in an Infrastructure Delivery Schedule. The list requires further additions and amendments which are set out in this response. A characteristic of the health estate in Wandsworth is that much of it is provided by Primary Care General Practices in privately owned premises. Further upgrades, expansion or relocation of these premises will be required to support the C.4 People First policy.</p> <p>The Infrastructure Delivery Schedule groups the location of health projects into Nine Elms or 'Wider Wandsworth'. It is essential that, for those projects in Wider Wandsworth, that the relevant Area Strategy is indicated to identify that new and improved health facilities are being planned in different growth areas of the borough. In addition, where a health project is to be delivered within a site allocation it is essential that is indicated.</p> <p>The CCG would welcome the opportunity to update the Infrastructure Delivery Plan to revise healthcare requirements in response to the housing capacity figures set out in the plan and to identify deficiencies and gaps in provision where additional investment may be needed. This commitment is set out in LP17 Social and Community Infrastructure clause A 3. This includes the expansion of capacity in response to service change, particularly regarding Primary Care Networks in the borough. The requirements for future floorspace due to the impact of service changes, housing development and population growth on the Primary Care Networks (PCN)s, taking into account existing space deficiencies, is shown in Appendix 1. Appendix 1 identifies a requirement for a further 9,959 sqm of Primary Care space across the borough during the plan period.</p> <p>Primary care space Requirement Current space deficit sqm Housing led growth space sqm Total additional floor space sqm Primary Care networks 6600sqm 3360sqm 9959sqm</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Infrastructure Delivery Plan is a living document and will be updated regularly. The CCG have been previously and will be asked in the future to provide commentary to the IDP during it's drafting process.
Proposed Change	No change required.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	99
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Wandsworth Draft Local Plan Consultation (Regulation 19)</u></p> <p>Thank you for the further opportunity to comment on the draft Local Plan. South West London Clinical Commissioning Group (SWL CCG) responded to the previous Regulation 18 consultation in March 2021. Representations were also submitted on behalf of St George's University Hospitals NHS Foundation Trust and by NHS Property Services and the CCG response referred to those representations.</p> <p>We note that under the legal Duty to Cooperate the London Borough of Wandsworth should engage and work collaboratively with prescribed bodies, such as the CCG, to draft the Local Plan. The Duty to Co-operate Statement (January 2022) correctly identifies that engagement and collaboration has taken place, including discussions at the Wandsworth Borough (Health and Care) Estates Group, communication with St George's University Hospitals NHS Foundation Trust on site allocations and presentations to the Health and Wellbeing Board.</p> <p>We note that the representations received to the Regulation 18 stage and Council's response have been published in a Statement of Consultation Report (January 2022). We note that the Council has responded positively to the CCG's comments, but we set out some further comments and observations.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No changes considered necessary.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	100
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM2 Wandsworth Town Place Based Policy</u></p> <p>We note that B. 1 'Inclusive Growth' now refers to capacity to provide 3,079 homes by 2032/2033, over the first 10 years of the Plan period. This is a significant number of new homes which will have an impact on healthcare infrastructure. Some sites are under construction, notably Ram Brewery (site WT2). The Swandon Way Cluster sites have planning permission (WT12 Homebase and WT13 B&Q, Smugglers Way) where the CCG and Council have sought and secured planning obligations to enhance existing healthcare infrastructure.</p> <p>We note that the two site allocations contain provision for social infrastructure and community facilities i.e. WT1 (Chelsea Cars and Kwik Fit, Armoury Way, SW18) and WT20 (Southside Shopping Centre, Wandsworth High Street SW18) and we would welcome the opportunity to explore these provisions for healthcare services use.</p> <p>However, we would welcome the opportunity to the assess the cumulative impact of growth and to discuss options for additional healthcare capacity in the town centre, which could involve a new health facility.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	Comment noted. The Council would welcome discussions on healthcare capacity. The Council's IDP, which is an evidence base document to the Local Plan, sets out detailed information of health infrastructure projects currently planned for Wandsworth over the next plan period as captured in consultation with key health stakeholders.
Proposed Change	No change considered necessary.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	101
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM3 Nine Elms</u></p> <p>We note that B. 1 'Inclusive Growth' now refers to capacity to provide 8,414 homes by 2032/2033, over the first 10 years of the Plan period. According to the Authority Monitoring Report 2019/20, there were 10,383 new homes completed or under construction as of 31 March 2020.</p> <p>We welcome the policy clause C.3 'People First' which states that the Council will continue to work in partnership with the NHS to deliver the new healthcare facility at Sleaford Street, secured as part of Phase 4a of the Battersea Power Station development.</p> <p>The potential new health facility at Nine Elms Square is indicated on Map 5.2 Spatial Area Map: Nine Elms. However, the corresponding site boundary – the New Covent Garden Market Northern Site 'Nine Elms Square' is not indicated.</p> <p>As the Infrastructure Delivery Plan notes the strategic need for a second facility at Nine Elms Square is monitored annually as part of NEV Healthcare Provision Programme and a final evaluation will be made in 2025. The CCG will work with the Council to review the scale and timing of housing and population growth over the next 10 years and the capacity of existing infrastructure in and around the northern part of VNEB, in both Wandsworth and Lambeth.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Covent Garden Market - Northern Site has not been included as construction has begun.

Proposed Change

No changes considered necessary.

Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	102
Title	PM 4 Clapham Junction and York Road/ Winstanley Regeneration Area
Number	Policy 5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM4 Clapham Junction and York Road/Winstanley Regeneration Area</u></p> <p>We note that B. 1 'Inclusive Growth' now refers to capacity to provide 2,995 homes by 2032/2033, over the first 10 years of the Plan period.</p> <p>We note that the policy clause C. 4 'People First' states that an assessment of community facilities including health provision will be required in support of development proposals to identify capacity and future needs. The York Road/Winstanley Regeneration Area is a key site and the site allocation CJ5 refers to the potential for health use. The Infrastructure Delivery Plan Appendix 1 - Infrastructure Delivery Schedule includes project H7 and refers to the permitted scheme for the York Road/Winstanley area (ref 2019/0024) which includes the provision of a health centre.</p> <p>Discussions between the CCG and Council on re-provision of services within the regeneration scheme are progressing which include capacity for future development in the wider area</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No changes considered necessary.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	

Agent Organisation Details	
Comment ID	103
Title	PM5 Putney
Number	Policy 6
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM5 Putney</u></p> <p>We note that B. 1 'Inclusive Growth' now refers to capacity to provide 200 homes by 2032/2033, over the first 10 years of the Plan period. We note that the site allocations refer to town centre uses which would not preclude health uses from being included, if needed.</p> <p>We note that 'People First' Clause C 4 refers to proposals to develop Putney Library into multi-purpose hub which supports an increased range of public services and community and cultural activities and flexible and affordable workspace. The CCG would welcome an opportunity to work with the Council to included enhanced healthcare capacity within the scheme.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	104
Title	PM6 Tooting
Number	Policy 7
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM6 Tooting</u></p> <p>We note that the area includes site allocation TO2 St Georges Hospital, Blackshaw Road, which has potential for mixed use development including residential and improvement of healthcare facilities.</p> <p>We supported the previous representations made by St George's University Hospitals NHS Foundation Trust and note that the whole hospital site is now allocated for development. We also welcome the statement in paragraphs 8.23 and 8.24 that the redevelopment of the site is subject to an approved Estates Strategy and development proposals will be prepared through a collaborative approach in accordance with the emerging Estates Strategy and forthcoming masterplan. We note that Map 8.1 Spatial Area Map Tooting still indicates proposed blocks on the Car Park and adjoining land, which we consider is unnecessary given the focus on the redevelopment of the whole site.</p> <p>We also welcome changes to the text which respond to the Trust's comments. Paragraph 8.27 'Parking' now supports measures to encourage active travel and the use of public transport to the site encouraging modal shift away from the private car. Paragraph 8.30 'Context' now requires that future redevelopment proposals will need to demonstrate how they successfully integrate new residential development with the existing hospital use so as not to inhibit the future operation of the hospital.</p> <p>The Infrastructure Delivery Plan (IDP) schedule includes Tooting Health Centre at 63 Beville Allen Close and refers to the optimisation of the health centre to create additional space (project ref H12). The health centre lies just outside of the Tooting area strategy boundary and town centre boundary. The project and scope have not been fully identified and the option to redevelop/expand or relocate should be included in the Infrastructure Delivery Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support noted.</p> <p>Limited progress on the estates plan has not allowed for the further working up of potential building frontages, however it is still considered useful to show the Council's preference for the frontages onto Blackshaw road.</p> <p>The Infrastructure Delivery Plan is a living document and can be updated with any potential redevelopment options during its next iteration.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	105
Title	PM7 Roehampton and Alton Estate Regeneration Area
Number	Policy 8

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PM7 Roehampton and Alton Estate Regeneration Area</p> <p>We note that B. 1 'Inclusive Growth' now refers to capacity to provide 849 homes by 2032/2033, over the first 10 years of the Plan period.</p> <p>We support the new clause C. 7 'People First', which promotes healthy and active lifestyles and measures to reduce health inequalities. However, we suggest the addition of "including improvements to local healthcare provision" to recognise the site allocations RO1 and RO3 and the projects in the Infrastructure Delivery Plan (ref H6 and H8).</p> <p>We note that the Site allocation RO1 Alton West Intervention Areas previously referred to a range of social infrastructure, including 'GP facilities, leisure and health uses'. In the latest draft version, there is reference to new and improved community facilities, but not specifically to health use. There are plans to transform primary care services in the area, which include improvements to primary care provision on the Alton West site to be included within the community hub building.</p> <p>We note that site allocation RO3 Queen Mary's Hospital car park proposes additional medical facilities and mixed uses in addition to replacement car parking. Optimisation of site use and possible development of additional buildings at the Queen Mary Hospital site will continue through the plan period.</p> <p>We welcome the change to the 'Site Allocation' text in response to St George's University Hospitals NHS Foundation Trust comment that any non-healthcare uses should only be permitted where it can be demonstrated in the context of an agreed Estate Strategy that the land is not needed for healthcare-related uses.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment and support noted.</p> <p>Health and community facilities are synonymous, but specific reference to health in the placemaking policy would provide certainty.</p>
Proposed Change	Amend criterion B.2 to read, 'Development should create new commercial, community, leisure, <i>health</i> and cultural facilities...'

Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	106
Title	PM8 Balham
Number	Policy 9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM8 Balham</u></p> <p>The area includes only one site allocation (BA1 Sainsbury's Car Park, Bedford Hill). However, another site allocation, Balham Health Centre (ref OUT1) is located to the south of the town centre. This is indicated on Map 10.1 Spatial Area Map: Balham. The allocation refers to mixed-use development providing residential and the expansion of healthcare facilities.</p> <p>The site owned by NHS Property Services. We agree with their previous representation that there is an opportunity to redevelop the site with the addition of residential use enabling the improvement and expansion of healthcare space, either on site or within the local area. An option for residential only re-development is only deliverable if a suitable alternative healthcare site is identified. No alternative site is identified and H13 in the IDP supports expanded health use and residential at the site.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	

Comment ID	107
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>PM9 Wandsworth's Riverside</u></p> <p>We note that considerable development along the riverside between Wandsworth Town and Battersea Park. However, a number of sites present further opportunities for housing growth. Policy PM9 B. 1 'Inclusive Growth' now refers to capacity to provide 904 homes by 2032/2033, over the first 10 years of the Plan period.</p> <p>Eleven sites are allocated in the area. All the sites are considered appropriate for mixed use, with some already having planning permission or subject to current applications.</p> <p>The Council's public health team and HUDU, on behalf of the CCG, have responded to individual planning applications to assess the site-specific impact of proposals, but we would welcome the opportunity to assess the cumulative impact of development in the area. It is noted that other planning applications which have come forward on sites which are not identified as site allocations.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	108
Title	Site Allocations Outside the Spatial Areas
Number	13
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Site Allocations Outside the Spatial Areas</u></p> <p>Two other site allocations are located close to the Wandsworth Riverside area.</p> <p>We note that the site at 259-311 Battersea Park Road (ref OUT2) has potential for mixed use including residential, community uses, including health, retail and the provision of a new public library. The site boundary includes the Doddington Health Clinic which is owned by St George's University Hospitals NHS Foundation Trust. The site boundary excludes Battersea Fields Practice premises in Austin Road. The NHS Trust and the CCG are in discussions with the Council and other stakeholders regarding development options combining the library, health clinic, GP surgery, retail units and Tesco site into an integrated solution. The OUT2 site includes re-provision of health space to ensure no loss of health floorspace in the area. Discussions have been held to include re-provision of Austin Rd Surgery within the scheme which will allow the Doddington Clinic floor area to be included with the Austin Rd Surgery as part of the redevelopment. The scheme has a significant number of land interests, both freehold and leasehold, and is subject to a procurement process to bring publicly owned assets into the scheme.</p> <p>The site at Bridge Lane Medical Group Practice, 20 Bridge Lane (ref OUT5) is owned by NHS Property Services and has potential for mixed use development including residential and health use. We agree with their previous representation that there is an opportunity to redevelop the site with the addition of residential use, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area such as within the OUT2 scheme at sufficient scale.</p> <p>We note that in response to comments from South West London and St George's Mental Health NHS Trust that a site allocation for Springfield Hospital has been added (ref OUT3). The adopted Local Plan Site Specific Allocations Document (2016) includes this site (ref 9.1).</p> <p>Residential development in the Plough Lane area of Merton and at Springfield Hospital is placing demands on Earlsfield GP Practice on Steerforth St. which will need extension or redevelopment and should be included in the Infrastructure Development Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Infrastructure Delivery Plan is a living document and will consider including Earlsfield GP Practice in future iterations.
Proposed Change	No change considered necessary
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	109
Title	LP2 General Development Principles
Number	Policy 13

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>LP2 General Development Principles</u></p> <p>In response to are comments, we support Clause C which states that development must demonstrate how it takes account of existing or planned social and transport infrastructure and contributes to the provision of additional infrastructure where necessary. We also note that paragraph 14.13 now refers to the Infrastructure Delivery Plan which includes an infrastructure outline a list of infrastructure projects some of which will be reliant on developer contributions.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.

Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	110
Title	LP15 Health and Wellbeing
Number	Policy 26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>LP15 Health and Wellbeing</u></p> <p>We support Policy LP15 which will help achieve the vision and an objective of the draft Local Plan to improve the health and wellbeing of the local population and reduce inequalities. We note that clause A. refers to Tooting, Battersea, Queenstown and Roehampton as priority areas. We suggest that the supporting text explains why particular attention should be given to these deprived neighbourhoods in the context of health inequalities in the borough.</p> <p>The Health Impact Assessment of the draft Local Plan (January 2022) notes that there is a life expectancy gap of approximately 9.3 years and 4.5 years for men and women respectively between the most and least deprived areas of the borough (paragraph 4.8). According to English Indices of Deprivation (2019), Wandsworth had three Lower Super Output Areas (LSOA) that ranked amongst the 10% most deprived in London: two in Latchmere and one in Tooting (paragraph 4.9).</p> <p>In response to our comments, we support the amended wording to clause B (1) relating to the submission of health impact assessments. We also welcome the additional of a new paragraph (16.8) which provides some guidance on health impact assessments.</p> <p>The Health Impact Assessment of the draft Local Plan recommends that major developments in areas of deprivation should undertake detailed HIAs (paragraph 4.12). This could be determined at the pre-application stage and could involve a greater level of analysis and community engagement. We suggest that a further sentence is added to paragraph 16.8 of the draft plan to reflect this recommendation: "For major developments in areas of deprivation, a detailed health impact assessment should be undertaken which could involve a greater level of analysis and community engagement."</p> <p>We also welcome the addition of new clause (4) which seeks to ensure the provision of affordable and healthy homes.</p> <p>The draft plan could also consider the longer-term health and wellbeing implications of the Coronavirus pandemic in terms of travel, changing working patterns and demand for office space, the future of town centres and design of buildings and spaces. The pandemic has accelerated changes in the way healthcare services are provided and how facilities are used, with greater demand for digital services and flexible space. It is recognised that the NHS has a role in supporting the regeneration of high streets in the borough with an opportunity to locate health and wellbeing community hubs in town centres. The Health on the High Street (NHS Confederation, 2020) report recommends accessible high street locations for the provision of primary and community healthcare services, including the temporary use of vacant units utilising the greater flexibility with the Class E use class.</p> <p>The draft plan should confirm that health and well-being facilities are town centre uses which, with good access to sustainable transport, sustain town centres and reduce carbon emissions through providing linked journey opportunities. Examples of supporting high streets includes the reuse of Silverdale House, Wandsworth High Street as a GP surgery and the provision of health and well-being space within the Southside Shopping Centre.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Local Plan takes forward the definition of main town centre uses as set out in the NPPF: as including retail development; leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). Policy LP42 Development in Centres, however, sets out in Part A that healthcare uses will be appropriate in the borough's designated centres and parades where they meet certain criteria. As such, the principle of locating healthcare provision in centres is supported.
Proposed Change	No change required
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	111
Title	LP17 Social and Community Infrastructure
Number	Policy 28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>LP17 Social and Community Infrastructure</u></p> <p>We support Policy LP17 which supports the provision of new social and community facilities, including health facilities as identified in strategies and investment plans using s106 planning obligations to mitigate the impact of development where insufficient capacity exists.</p> <p>In response to our comments, we are pleased that the policy has been amended to clarify (in clause B 6) that the loss of a health facility will only be permitted where it has been declared surplus as part of a strategic restructuring of health services demonstrated by an overarching estates strategy or similar needs-based assessment.</p> <p>However, to fully align with Policy S1 clause F 2) we suggest the following amendment:</p> <p>"6. that for existing health or emergency service facilities, loss will only be permitted where facilities are declared surplus to need as part of <u>a service transformation plan</u> any strategic restructuring of health or emergency services demonstrated through an overarching or estates strategy where investment is needed in modern, fit for purpose infrastructure and facilities or similar needs-based assessment."</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Upon further assessment the Council considers that a modification to the Local Plan would be appropriate. To ensure clarity the text should be modified to fully reflect the intention of the London Plan SI2 policy.
Proposed Change	Amend wording in policy LP17 B as follows: LPB.6 'that for existing health or emergency service facilities, loss will only be permitted where facilities are declared surplus to need as part of <u>a service transformation plan</u> any strategic restructuring of health or emergency services demonstrated through an overarching <u>or</u> estates strategy <u>where investment is needed in modern, fit for purpose infrastructure and facilities</u> or similar needs-based assessment."
Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	112
Title	LP25 Protecting the Existing Housing Stock
Number	Policy 36
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>LP25 Affordable Housing</u></p> <p>It is recognised that the shortage of affordable housing in London is hindering the recruitment and retention of public service workers. The National Planning Policy Framework definition of affordable housing (Annex 2) includes housing for sale or rent for essential local workers, which includes NHS staff. The latest national NHS guidance is 'Homes for NHS Staff' published by NHS Improvement in June 2019.</p> <p>The use of public sector land represents an opportunity to deliver homes that can meet the needs of the borough's essential workers. It is noted that the Council's Housing and Homelessness Strategy 2019-2022 states that the Council will give Wandsworth workers priority access to affordable and intermediate housing and where appropriate this will include options designed to meet demand from key workers including for low cost rented housing.</p> <p>To reflect paragraph 4.5.6 of the London Plan we suggest that the following paragraph is added:</p> <p>"Public sector land represents an opportunity to deliver homes that can meet the needs of the borough's essential workers. Innovative housing products that meet the requirements of this Policy including approaches that set aside a proportion of homes on land owned by public sector organisations for essential workers will be supported."</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Upon further assessment the Council considers that a clarification to the Local Plan would be appropriate.
Proposed Change	Amend paragraph to include the following paragraph after 17.12: <i><u>“Public sector land represents an opportunity to deliver homes that can meet the needs of the borough’s essential workers. Innovative housing products that meet the requirements of this Policy including approaches that set aside a proportion of homes on land owned by public sector organisations for essential workers will be supported.”</u></i>
Consultee Full Name	Mr David Wilson
Consultee Organisation Details	Senior Town Planner Thames Water
Agent Full Name	
Agent Organisation Details	
Comment ID	114
Title	LP22 Utilities and Digital Connectivity Infrastructure
Number	Policy 33
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>We support Policy LP22 and supporting paragraphs in relation to water and sewerage infrastructure capacity as they take into account our previous representations.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework(NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...” Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects” Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to</p>

set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...” Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...” The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306). Policy S15 of the London Plan 2021 relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development. We therefore support the section on ‘Water and Sewage Infrastructure’ in paragraph 16.66 as it is in line with our previous representations. In line with the guidance in the NPPF, Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies’ AMP8 Business Plan will be agreed with Ofwat during 2024. We therefore support Policy LP22 C. in this respect. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity> We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section. Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.

Consultee Full Name	Mr David Wilson
Consultee Organisation Details	Senior Town Planner Thames Water
Agent Full Name	
Agent Organisation Details	
Comment ID	115
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	We support Policy LP10 in relation to water efficiency as it takes into account our previous representations. Water Efficiency/Climate Change The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy. Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: https://www.thameswater.co.uk/Be-water-smart It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. We therefore support the requirement for this in Policy LP10 A 7.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Mr David Wilson

Consultee Organisation Details	Senior Town Planner Thames Water
Agent Full Name	
Agent Organisation Details	
Comment ID	116
Title	LP6 Basements and Subterranean Developments
Number	Policy 17
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	We support Policy LP10 in relation to sewer flooding as it takes into account our previous representations. Thames Water's main concerns with regard to subterranean development are: 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. We therefore support Policy LP6 A. 8 which requires the installation of a positive pumped device (or equivalent).
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Mr David Wilson
Consultee Organisation Details	Senior Town Planner Thames Water
Agent Full Name	
Agent Organisation Details	
Comment ID	117

Title	LP12 Water and Flooding
Number	Policy 23
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>We support Policy LP12 in relation to reference to sewer flooding as it takes into account our previous representations. In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. It is considered that the wording in LP 12 G sufficiently reflects Thames Water's comment regarding surface water drainage.
Proposed Change	No change required.
Consultee Full Name	Ross Newby
Consultee Organisation Details	Spencer Club
Agent Full Name	
Agent Organisation Details	
Comment ID	119

Title	Paragraph
Number	3.19
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>The preparation of the Local Plan is flawed in relation to sports provision due to the reliance as part of the Evidence Base on a Playing Pitch Strategy that was produced in 2013. The 2103 PPS identified a shortage of supply of good quality playing pitch space, relative to the demand for it, across a number of sports. Limited progress has been made since towards redressing the balance.</p> <p>Further, it is unclear how any updated Playing Pitch Strategy will sit in relation to the Statutory Plan and in particular how sites and funding streams will be identified to meet the needs of existing and future sports users in respect of new and improved playing pitches and other associated facilities.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The Local Plan sets out policies which aptly protect and would enhance playing pitches within the borough. The specific actioning regarding providing sports pitches in line with the strategy is a wider Council responsibility which does not specifically fall under the strategic planning.</p> <p>An updated Playing Pitch Strategy is expected to be approved in Autumn 2022.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Mr Andrew MacMillan
Consultee Organisation Details	Wandsworth Living Streets
Agent Full Name	
Agent Organisation Details	
Comment ID	120
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Living Streets Response to the draft Local Plan</p> <p>We very much welcome the emphasis on Place Performance and Place Making, the adoption of the Sustainable Transport Hierarchy, continuous reference to the Wandsworth Environment & Sustainability Strategy (“WESS”) throughout the LP.</p> <p>We note the Local Plan is the document that sets out the vision for the all of Wandsworth’s public and private spaces over the next couple of decades. We also note that Wandsworth Borough Council must adhere to both London and UK planning policies, and there are therefore statutory constraints within which the LP must be developed.</p> <p>We appreciate the LP is by necessity a very long and detailed document, and therefore our response is set around 5 key themes which we hope are reflected in the next iteration of the LP, noting that the Local Plan is the pre-eminent document that will determine how all our spaces and places will be enhanced from 2023-2038:</p> <ol style="list-style-type: none"> 1 World-class design 2 Legacy streetscape 3 Technology & data 4 Key performance indicators 5 Consultations <p>1 World-class design</p> <p>Within the London and national context, we expect the LP, and its policies, to strive to ensure that any new developments across brown-field sites, town centres, open spaces and legacy streets are ambitious, learn from and use best practice, and enable decision makers, including officers and councillors, to make decisions that are entirely consistent with the Local Plan. Each major new development should learn and apply the lessons from recent developments within the Borough and elsewhere, including for enabling, and even demanding developers deliver BREEAM “Outstanding” buildings for example. We would like to see planning policies that are aspirational for both the Council and Developers alike, and go beyond merely facilitating the delivery of standard scheme developments.</p> <p>Imagery to enable aspirational development</p> <p>We note that the LP is quite a “wordy” document punctuated with imagery of existing spaces across the Borough. We would like to see more visual examples of best practice throughout the document to elevate everyone’s expectations of what is possible. The LP is about creating things that people can see, touch and feel – we would like to see this better reflected in this document using visualisations of best-in-class examples of large-scale developments, buildings and places, from Wandsworth and around the World.</p>

1 Legacy Streetscape

In paragraph 1.9 we note that WBC intends “to be the greenest inner London Borough” and where businesses, town centres, people and neighbourhoods thrive. Whilst The LP includes much detail on town centres and open spaces, we note that our legacy streetscape and neighbourhoods, built predominantly from circa mid-late 1800s to the present day, is the predominant land-use across the Borough and yet this is not formally recognised within the LP. We would therefore like to see a new section specifically dedicated to our legacy streetscape, similar to section “21. Green and Blue Infrastructure and the Natural Environment”, and aligned with the WESS and Walking & Cycling Strategy.

In this new section, we would expect it to cover, but not limited to, the following:

- **Garden strategy** – ensure local residents are supported in maintaining and enhancing green space at the front and rear of their homes to support bio-diversity, noise suppression, and Summer heat and water run-off mitigation. For example we note a proliferation of the use of plastic “grass” in the Borough which is environmentally harmful, yet residents don’t necessarily have the information to make informed decisions – WBC can play a leading role in ensuring all residents make informed choices that align with the WESS.
- **Pavement strategy** - Pavement space should be a protected public asset. The LP policies should ensure total pavement space on each street is increased rather than diminished. We are opposed to measures which sacrifice this space to enable or encourage more driving, such as pavement-placed EV chargers and electronic advertising hoardings (e.g. BT InterLink)
- **Kerbside strategy** – we ask WBC to consider all potential uses of our kerbside for now and the future, aligned with the WESS (and other relevant strategies, notably the Walking and Cycling Strategy, and the Active Wandsworth Strategy) and which could include a much broader use of this valuable asset, including the potential for highly efficient, technology-enabled waste management and recycling, pocket parks, dwell spaces for adults and seniors, play spaces for children, energy generation, enhanced tree cover and re-greening, and better biodiversity. Residents should be given more agency and control over the space outside their homes – if they don’t own a car, residents, individually and collectively should be granted permission for alternative, community and environment-enhancing uses.
- **Parking strategy** – we would like to see an update and expansion of CPZs better aligned to changing local transport needs, and which address significant weekend parking issues. We note the streets are often busier midday on a Sunday than during the week, and CPZs need to reflect this particularly in respect of new developments which change driving patterns, whilst ensuring WBC retains parking income. Too often, more relaxed parking controls at weekends often inhibit cycling in particular, making inclusive family cycling, whether for transport or recreation, extremely challenging and less safe. We continue to advocate for a review of Wandsworth’s parking strategy with the aim of making charges better reflect the cost of car parking to wider society. In this context, we note that Wandsworth has the highest proportion of roadpace (nearly 20%) taken up by residents’ onstreet car parking of any London borough; and the high value of land allocated to residents’ onstreet parking.

To highlight the need for a new section on Legacy Streetscape, paragraph 20.7 states, "Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. This should manifest itself in the form of active travel infrastructure such as clear and well-designed cycle lanes, cycle parking infrastructure, and improvements to the main pedestrian thoroughfares". But it is clear isolated active travel infrastructure is not, in of itself, sufficient and needs to be considered in the wider context/geographical area that enables congruous, cross-Borough networks to be established, rather than simply creating isolated, unconnected pockets of high-quality networks dispersed across the Borough that do not connect residential areas, our open spaces and town centres.

We believe this section is critical in enabling the delivering of the WESS, enabling Sustainable Transport and supporting the new Walking & Cycling Strategy.

1 Technology & Data

We would like to see a section within the LP which explicitly references the use of existing, new and emerging technologies to improve the Borough’s buildings and places, and the use of data to inform better choices and decision making. “Smart Growth” and first-class local engagement can only be achieved through relevant and pertinent information. This may include, but is not limited to:

- District heating networks (incl. elimination of gas combustion where possible)
- Micro power/electricity generation including wind, solar and battery storage
- Heat reclamation from waste hot water
- AI-based technologies for determining movement strategies around new sites (incl. people & vehicle movements)
- Ensuring all developers are using Building Information Modelling, concepts such as “Digital Twins” and using video CGIs to improve engagement and consultation
- Construction traffic & supply chain – use of aggregated data across sites to enable more efficient logistical solutions across the Borough
- Waste management – developing solutions to enable residents of new and legacy housing stock to understand their refuse/waste volumes

1 Key performance indicators

The key to determining success is by setting out clear, concise and measurable objectives at the outset that can then be unambiguously assessed following implementation.

We would therefore like to see tangible and realistic metrics and key performance indicators (“KPIs”) applied to the key planning policies, and measures that support broader WBC objectives.

For example, we know that air quality is the direct consequence of a variety of activities including domestic energy and private car use. We therefore expect to see specific targets to enable a shift in behaviours, e.g. reduced car use/ownership by better targeted CPZ permit pricing structures.

Healthy Streets metrics – we would like the Healthy Streets Check for Designers used (and to see the Healthy Streets Index) for all new developments, and would like WBC to adopt a policy that any development or change to the streetscape leads to a measurable and tangible improvement in the Healthy Streets Index, both for the scheme itself and surrounding streets and places.

WESS - to support the WESS, we would like to see statistics and KPIs for emissions produced for new developments, and improvements and repairs to the public realm so that stakeholders can understand the environmental impact of construction of new buildings and repair of carriageways for example on our local, national and global climate.

Land use - we would also like to see annual data produced on land use across the Borough, including residential, office, industrial, public transport, roads (split between ‘free’ carriageway and parking spaces), pavement space, open spaces and water courses. Only through understanding land use in the Borough, can we determine when the Local Plan is leading to tangible overall improvements in our places and streets.

1 Consultations

We note that undertaking Consultations is a statutory obligation when determining the consent and implementation of new planning consents or changes to the public realm. However, we also note that the WBC processes often feel “opaque” to the general public and clarity re: the approach to consultations would be very much appreciated, and should be addressed and well articulated in the dLP.

As an example, a planning application which is overwhelmingly rejected by local residents will often gain consent (e.g. Atheldene/Garratt Regeneration) without any amendment, whilst changes to the legacy streetscape will almost always be rejected with relatively few objections (but which slightly exceed those in favour).

We would therefore like to see Consultations addressed as a specific section, with a clear process set out, and identifying how consultations work, the timeframes, the decision-making forums, and include other key information that wider stakeholders may find valuable when participating in the consultation process.

We would also urge WBC to consider exploring other approaches to consultations that are successfully used elsewhere to gain a more inclusive and insightful perspective from a broader local demographic, perhaps through sampling. Presently consultations tend to attract opinions at the extremes of pro/against which frequently results in frustration and disengagement if people feel they are not being heard. A more inclusive consultation process would enable quieter voices be heard, whilst getting a broader and more useful insight into local resident/business concerns, expectations and proposals for scheme improvements. Exemplars of best practice in talking to people about the future of their streets are increasingly available across London.

Scheme tracker - the key to successful consultation is openness, and ensuring any variations against consented schemes are shared as proactively as possible, such that local stakeholders understand the balance of risk between local residents, the council and developers/land owners. A clear tracker for each development from submission through to delivery and completion, including highlighting any changes, would be extremely useful.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted. It is considered that Local Plan Chapters 14 Achieving High Quality Places and Design Excellence; 20 Sustainable Transport; and 21 Green and Blue Infrastructure and the Natural Environment capture much of the suggestions in the Legacy Streetscape point and a new chapter is not necessary at this time.

	Local Planning Policies are not required to include Key Performance Indicators. The Wandsworth Local Plan has completed all required consultation requirements.
Proposed Change	No changes considered necessary.
Consultee Full Name	Mr Andrew MacMillan
Consultee Organisation Details	Wandsworth Living Streets
Agent Full Name	
Agent Organisation Details	
Comment ID	121
Title	Paragraph
Number	2.91
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> Page 29 – “15 minute Neighbourhood” – this needs to be clearly defined, since it is not a distance metric and is therefore open to interpretation depending on transport mode
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>As a way to ensure the borough remains an attractive place to live and work in, the borough's centres and local parades will be developed to be more accessible by active travel and provide a greater range of uses.</p> <p>Paragraph 2.91 sets out that 15-minute neighbourhoods allow for access for all to day-to-day facilities which are considered to be within 15 minute walking distance. The 15-minute neighbourhood is a concept rather than something that is defined (unlike a designation) for planning purposes.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Andrew MacMillan

Consultee Organisation Details	Wandsworth Living Streets
Agent Full Name	
Agent Organisation Details	
Comment ID	122
Title	Paragraph
Number	2.69
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> 69 Traffic and Public Transport – this should probably say “2.69 Motor Vehicles and Public Transport”, given that (motor) traffic is a consequence of the use of the transport mode
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The title of the paragraph is considered appropriate.
Proposed Change	No change is considered necessary.
Consultee Full Name	Mr Andrew MacMillan
Consultee Organisation Details	Wandsworth Living Streets
Agent Full Name	
Agent Organisation Details	
Comment ID	123
Title	Sustainable Transport
Number	20

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PTAL – please include a PTAL map</p> <p>Sustainable Travel Hierarchy – please include an image of this in Section 20</p> <p>Construction Logistics Plan – we would like to see a standard construction logistics plan for all developments that specifically addresses road danger (particularly to people walking and cycling), sets expectations and targets for developers and contractors that ensures pavement space, safe crossings and cycling is protected, and specifies very clear routes to/from sites across the Borough. This may require setting minimum standards for banksmen/women based on scheme size.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>A map of London's PTAL map can be accessed on TfL's website.</p> <p>The Sustainable Transport Hierarchy is referenced and supported in paragraph 2.72 of the Local Plan and an illustration can be seen in the Wandsworth Environment and Sustainability Strategy. This is considered sufficient and it is not required to be included in the Local Plan.</p> <p>Setting a standard Construction Logistics Plan for all developments is considered too rigid and it is considered that the Local Plan already sets sufficient parameters for what should be included in a CLP. Paragraph 15.94 establishes that the Council may also require a Construction Logistics Plan (CLP), in areas that are subject to high traffic congestion to ensure that vehicles entering the site do not adversely impact on local traffic; and a management plan that sets out how developers monitor dust, noise and vibration, and where necessary take the appropriate action if issues arise. Paragraph 20.29 sets out that Construction Logistics Plan should be submitted in line with guidance in London Plan Policy T7.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Mr Andrew MacMillan
Consultee Organisation Details	Wandsworth Living Streets
Agent Full Name	
Agent Organisation Details	
Comment ID	124
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> Sections 14-21 are chapters re: policy and therefore should be moved ahead of sections 4-13. Stakeholders would likely need to understand the policies before they then understand how they apply to specific areas in the Borough / Spatial Strategies
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The structure of the Local Plan is considered appropriate.
Proposed Change	No change considered necessary
Consultee Full Name	Mr Andrew MacMillan
Consultee Organisation Details	Wandsworth Living Streets
Agent Full Name	
Agent Organisation Details	
Comment ID	125

Title	LP9 Advertisements
Number	Policy 20
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> LP9 Advertising – this policy needs to be tightened up. Electronic advertising boards are increasingly visually intrusive, in many cases are designed to distract drivers (with obvious implications for road danger) and the designs are intruding over public pavements and carriageways which seems unreasonable given other, sensible planning constraints
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The plan should be read as a whole. General development principles are set out at LP2, and do not need to be repeated in LP9.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Vicki Scheele
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	127
Title	Area Strategy for Tooting
Number	8
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p>I've been reviewing the most recent copy of the Tooting Town Local plan. Lots of great aims and vision. Will be a good start t, hopefully can be completed way before 2030.</p> <p>However the plan is at odds with the recent decision to approve the plans for the Tooting Constitutional Club. As one of the really old buildings in Tooting this is what helps bring it's character. Yet complete demolition has been approved. The local plan states that preserving buildings and the local townscape is key, and even shows the corner of Woodbury and Tooting High Street as a key vista, overlooking the old buildings of the Constitutional Club.</p> <p>https://tinyurl.com/3crx29w6</p> <p>Please can I have more information about how and why this plan was approve, when it seems at odds with the Local Plan for Tooting?</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The principle of such development was established under planning permission 2018/0230 approved by the Planning Applications Committee held on 18 April 2018. The site itself is not subject to any statutory heritage designations nor is it part of a conservation area. The demolition of the buildings were considered by the Planning Inspectorate when regarding the scheme under ref: 2014/6760, who concluded in August 2015 that none of buildings on the site were of sufficient historical interest to prevent the redevelopment of the site. This was on the provision of a suitable replacement scheme that provides replacement community space and open space.</p> <p>Policy LP3 sets out the criteria a development proposal would have to comply with regarding development that may affect a heritage asset or the historic environment.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Gordon Adams
Consultee Organisation Details	Head of Planning Battersea Power Station Development Company
Agent Full Name	Mr David Shields
Agent Organisation Details	Associate DP9
Comment ID	128
Title	Area Strategy for Nine Elms
Number	5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

<p>Soundness - Complies with Duty to Co-operate?</p>	
<p>Details of reason(s) for representation</p>	<p>REPRESENTATIONS ON BEHALF OF BATTERSEA POWER STATION DEVELOPMENT COMPANY</p> <p>On behalf of our client, Battersea Power Station Development Company ('BPSDC'), please find enclosed representations to the London Borough of Wandsworth ("LBW") 2022 Local Plan 'Publication' (Regulation 19) consultation ('the Draft Local Plan'), particularly relating to the ongoing redevelopment of the Battersea Power Station site to deliver a sustainable new town centre under the masterplan planning permissions granted on the site since 2011 ('the BPS Masterplan').</p> <p>Introduction and Context</p> <p>The comprehensive phased regeneration of the Battersea Power Station site, including the restoration works to the Grade II* listed Power Station, began in 2013. Nine years on, Phase 1 is completed and occupied, and Phase 2 (the Power Station) and Phase 3A are due to be completed this year (2022). Occupation of Phase 4a is due to begin in 2022 and complete in 2023. In total, the masterplan will deliver a new town centre for Wandsworth comprising at least 2,500 new homes and over 3 million sq. ft of commercial floorspace, including office, retail, hotel, leisure, community and cultural uses.</p> <p>As the masterplan is currently only halfway through delivery, it remains important to BPSDC that the Wandsworth Local Plan reflects the objectives of the Masterplan that have to date been shared with the Council, the GLA, Historic England and other local stakeholders. Ongoing certainty and consistency are important for the delivery of the remainder of the scheme.</p> <p>Whilst the intention is to deliver the remainder of the masterplan through Reserved Matters applications under the existing planning permission, we cannot preclude the potential for further Section 73 applications being required in order to complete the regeneration of the site. As such, it is important that the Local Plan recognises that the implemented masterplan permission is a material consideration and that new policies should not be introduced where they would contradict the masterplan planning permissions already granted on the site.</p> <p>Accordingly, please find our comments below, which we respectfully request are taken into consideration. We have commented on the sections of the Draft Local Plan that are materially different to the adopted Local Plan and are particularly pertinent to the regeneration of Battersea Power Station.</p> <p>The Battersea Power Station Central Activities Zone (CAZ) Retail Cluster</p> <p>Draft Local Plan Paragraph 2.14, Policy PM3 (Nine Elms) and Map 19.1 (Designated Centres and Frontages) identify Battersea Power Station as an 'emerging retail cluster'. This aligns with the London Plan (2021) Policy SD4 (The CAZ), which identifies Battersea Power Station as a 'potential' retail cluster, which is replicated at the Draft Local Plan Policy LP41 (Wandsworth's Centres and Parades). Draft Policy SD4 further states that CAZ retail clusters are 'significant mixed-use clusters with a predominant retail function and in terms of scale, broadly comparable to Major or District centres in the London Plan town center network'.</p> <p>The designation of Battersea Power Station as an 'emerging retail cluster' is supported by our client, which aligns with the significant existing and future delivery of commercial floorspace across the Battersea Power Station site. However, in light of the opening of the Power Station (Phase 2) and High Street (Phase 3A) later this year (2022), we would question the need to preface this designation with <i>emerging</i> and would instead suggest that the site is defined as an established retail cluster to reflect the imminent openings.</p> <p>Whilst our client is wholly supportive of the proposed allocation as a retail cluster, our client is strongly of the view that the boundary indicated by the purple dashed line on Map 5.2 and 5.3 should be amended so that it encompasses the entirety of the BPS Masterplan, as the commercial floorspace to be delivered within the BPS Masterplan extends across all phases of the development. Additionally, the public open space (shown on pages 114 and 115) appears to expand into an area where Phase 7 of the BPS Masterplan is located – this should be revised to omit the encroachment into Phase 7.</p> <p>Nine Elms Area Strategy</p>

Draft Policy PM3 at paragraph 5.38 states ‘*Taking a place-based approach, it is necessary to consider the inter-relationship of the sites within the cluster and its integration with surrounding developments in accordance with the Area Strategy and the vision and objectives of the Plan, rather than on a project by project or individual development basis*’. Whilst our client supports the intent for collaboration within the Kirtling Street Cluster, it is worth noting that the future phases of the BPS Masterplan will continue to be brought forward via reserved matters submissions for the plots in its ownership.

Map 5.2 (Spatial Area Map: Nine Elms) and Map 5.3 (Spatial Area Map: Kirtling Street Cluster) set out in the Draft Local Plan identify a number of strategic spatial allocations. These are generally supported, however, some elements do not align with the vision of the BPS Masterplan, including the suggested north-south pedestrian route located to the east of the BPS Masterplan Site, adjacent to plots 1 and 3. Our client therefore seeks assurances that the vision set out in Maps 5.2 and 5.3 is consistent with the consented position set out in the latest BPS Masterplan planning consent, including the information included within the supporting Design Codes.

It is also worth noting that the NLE Western Entrance shown on page 110 is in the incorrect location and should instead be located on the High Street.

Employment and Business

Draft Local Plan Policy PM3 states that economic development and regeneration of the VNEB Opportunity Area within the CAZ will be focused at the Power Station and the Embassy district near Vauxhall. It further states that the council will seek to incorporate the provision of affordable workspace, where possible. As the BPS Masterplan has already been implemented under an existing outline planning consent which does not have any allowance for affordable workspace provision, any future section 73 applications submitted in relation to the floorspace already consented under the outline planning consent should not be subject to the requirements of Draft Policy PM3, specifically the requirement to deliver affordable workspace.

Additionally, draft Local Plan Policy LP2 (General Development Principles) states that ‘*development must take into account the operational needs of existing businesses and not prejudice the activities of existing uses/operations*’. We would question whether such a policy requirement, which is concerned with the specific needs of existing businesses/tenants, falls within the remit of planning policy. As such, we would suggest that this line is omitted from the policy wording, particularly given that Draft Policy LP14 already seeks to ensure new development does not lead to detrimental effects on existing and new users or occupiers.

Summary

We welcome the ambition and scope of the Draft Local Plan however; we do have concerns over the potential application of some of the policies with regards to existing planning permissions and are keen to ensure that we can continue to work collaboratively with the Council to deliver the comprehensive regeneration of the Battersea Power Station site.

We trust our comments will be acknowledged in progressing the Draft Local Plan, and we would welcome the opportunity to further engage in the planmaking process in the future. Please contact David Shiels or Eleanor Hulm of this office for further information.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The opening of the Power Station (Phase 2) and the High Street (Phase 3A) are to be celebrated, however at the time of writing and publication, the anticipated retail cluster remains one in development, and therefore emerging is considered appropriate. Related to this is the indicative boundary included on Maps 5.2 and 5.3: whilst commercial floorspace is planned for all of the site, there remains significant flexibility over what quantities the retail and leisure floorspace will be brought forward (see, in particular, application 2021/0414). Retaining an indicative boundary focused on the known foci therefore remains appropriate.

The open space identified as 'Proposed Nine Elms Park' is accurate but should also given the scale of the map be considered indicative.

The 'suggested/ proposed new pedestrian route' was not captured in the Design Code but it is does not conflict and should be included as it is sufficiently flexible, and unintrusive requiring a permeable route through the cluster.

The icons representing the entrances to the Battersea Power Station underground are considered indicative and appropriate.

The existing outline planning consent for the BPS Masterplan is recognised, and will be accounted for as a material consideration against the requirements of PM3.B.5. Similarly, the requirements set out in LP2.F, with respect to the operational needs of existing businesses, will be applied proportionately.

Proposed Change

No change considered necessary.

Consultee Full Name	Ballymore Group
Consultee Organisation Details	Ballymore Group
Agent Full Name	Helena Burt
Agent Organisation Details	Planner Rolfe Judd Planning
Comment ID	130
Title	LP3 Historic Environment
Number	Policy 14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Policy LP3 Historic Environment –We are pleased to see the Council have agreed with our proposed revisions to the demolition in conservation areas policy.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	All England Lawn Tennis Club (the A
Consultee Organisation Details	
Agent Full Name	Emily Cochrane
Agent Organisation Details	Associate Rolfe Judd Planning
Comment ID	131
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Representations made on behalf of All England Lawn Tennis Club (AELTC)</p> <p>We write on behalf of All England Lawn Tennis Club (AELTC) to make representations to the London Borough of Wandsworth's Draft Local Plan which is currently out for Regulation 19 consultation (February 2022). These representations are written with specific reference to the Wimbledon Park Golf Club, which partially falls within the administrative boundary of the London Borough of Wandsworth.</p> <p>The AELTC submitted representations on the Draft Local Plan in March 2021 as part of the Regulation 18 consultation. This response should be read in combination with the previous representations submitted in March 2021. Following the Regulation 18 consultation, as part of the regulation 19 consultation the Council have provided the following response to the representations submitted.</p> <p><i>"Wimbledon Park Golf Club is located immediately to the east of the main All England Lawn Tennis Club (AELTC) site along Church Road. The northern element of the site is within the administrative boundary of the London Borough of Wandsworth (LBW), with the remaining within the London Borough of Merton (LBM). The current existing use of the site is for a golf course.</i></p> <p><i>The LBM has allocated the Wimbledon Park Golf Club, in combination with the main AELTC site, to support it as a sporting venue of national and international significance. Site allocations in LBW are not intended for the promotion of sporting venues. Consequently, it would be inappropriate to designate the site as such. However, proposals for the area within LBW will be assessed against the development plan. Wimbledon Park Golf Club, Church Road does not require site allocation."</i></p> <p>We are concerned with the comment that <i>"Site allocations in LBW are not intended for the promotion of sporting venues. Consequently, it would be inappropriate to designate the site as such"</i>. In accordance with the para 17 of the NPPF the Development Plan must include strategic policies to address the local planning authorities priorities for the development and use of land in its area. This includes leisure facilities (NPPF para 20), for which the proposals as part of the AELTC would fall under. We therefore do not understand why leisure facilities are unable to be allocated.</p> <p>Despite this, it is understood that it may not be necessary to include Wimbledon Park as a site allocation within the draft Local Plan. However, given the cross boundary nature of the site with the London Borough of Merton, it is important that both Local Plans are consistent in their treatment of the site.</p> <p>In accordance with paragraph 24 of the NPPF Local planning authorities are under a duty to cooperate with each other on strategic matters that cross administrative boundaries. As drafted, the Local Plan fails to recognise the AELTC site and its allocation within the London Borough of Merton's adopted and draft Local Plan.</p> <p>Further, emerging policies should refer to the London Plan. Policy S5 of the London Plan outlines the Mayor's approach to sports and recreation, including the provision of new facilities and the enhancement, replacement, and/or loss of existing facilities. Development proposals are expected to increase or enhance the provision of facilities.</p> <p>In light of the above, it is again requested that the draft Local Plan for Wandsworth recognises the future aspirations for Wimbledon Park Golf Club site and there is a consistency in approach to the site between the London Borough of Wandsworth and Merton. The Local Plan remaining silent on this point fails to demonstrate effective cooperation on a site that crosses administrative boundaries. Further, The Championships are of national and international importance and provide as significant contribution to the economy, including locally. It is therefore important that the future aspirations of the AELTC on the Wimbledon Park Golf Club site are recognised within the new Local Plan.</p>

	<p>Conclusion</p> <p>The AELTC welcome the opportunity to comment on the draft New Local Plan. Whilst the AELTC are generally supportive of the draft Local Plan and the proposed policies, we again request that there is a consistency in approach to the Wimbledon Park Golf Club site due to the cross Borough nature of the site. It is important that the future aspirations of the site are recognised, particularly due to the national and international importance of The Championships.</p> <p>The AELTC trust that their comments will be fully considered as part of the consultation and we would be happy to discuss the matter further on their behalf.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>Between Merton and Wandsworth, the proposed expansion of the All England Lawn Tennis Club into the adjacent Wimbledon Park (mostly located in Merton and a site allocation Wi3 in Merton's Local Plan, partly located in Wandsworth) presents shared issues for the two boroughs in respect of the holding of the annual Championships, heritage, travel and open space issues.</p> <p>Wandsworth and Merton Councils have through the Duty to Cooperate process set out that this site will be considered through the planning application process and a cross-boundary planning application has been submitted to both boroughs in their roles as Local Planning Authorities as the development straddles the borough boundary (reference 21/P2900 in Merton; reference 2021/3609 in Wandsworth). It is not considered necessary to include additional reference to the site in the Wandsworth Local Plan. The Local Plan policies will be used as part of this consideration including LP54. The Statement of Common Ground contains wording which shows that Wandsworth Council have engaged in the Merton Local Plan process (see paragraph 5.48 and 5.49 of the Statement of Common Ground between Merton and Wandsworth). This demonstrates effective cooperation on a site that crosses administrative boundaries.</p> <p>The Publication Local Plan policy LP54 Open Space, Sport and Recreation does comply with London Plan Policy S5 and requires proposals to provide new or replace existing sports and recreation facilities.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Ballymore Group
Consultee Organisation Details	Ballymore Group
Agent Full Name	Helena Burt
Agent Organisation Details	Planner Rolfe Judd Planning
Comment ID	133
Title	LP4 Tall and Mid-rise Buildings

Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Policy LP4 Tall Buildings – We support the Council in adopting the London Plan approach to height which would support this area for tall buildings subject to detailed design. We also appreciate the clear definition of tall buildings within the Borough.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required
Consultee Full Name	Ballymore Group
Consultee Organisation Details	Ballymore Group
Agent Full Name	Helena Burt
Agent Organisation Details	Planner Rolfe Judd Planning
Comment ID	134
Title	LP27 Housing Standards
Number	Policy 38
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Policy LP29 Dual Aspect – We support the policy amendments to remove reference to main roads.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted
Proposed Change	No change considered necessary

Consultee Full Name	Ballymore Group
Consultee Organisation Details	Ballymore Group
Agent Full Name	Helena Burt
Agent Organisation Details	Planner Rofe Judd Planning
Comment ID	135
Title	LP40 Safeguarding Wharves
Number	Policy 51
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Policy LP43 Safeguarded Wharf – We strongly support the updates to reflect the London Plan Approach and allow consolidation of wharves subject to capacity retention. Within this positive context our comments relate solely to the proposed site allocation for the Kirtling Wharf Cluster. Our comments on this topic are set out below:
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changes required.
Consultee Full Name	Ballymore Group
Consultee Organisation Details	Ballymore Group
Agent Full Name	Helena Burt
Agent Organisation Details	Planner Rofe Judd Planning
Comment ID	136

Title	NE9 Kirtling Wharf, Nine Elms, SW8
Number	Statement 26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Kirtling Street Cluster Site Allocation</p> <p>As set out in our previous representations we strongly support the proposed allocation of the Kirtling Street Cluster in seeking to bring forward development following the completion of the Thames Tideway Tunnel.</p> <p>The cluster is a key location joining the Battersea Power Station development with the wider masterplan for the area. The proposed cluster will unlock the connection of the sites and has the potential to contribute to a key part of the Nine Elms Masterplan delivering high quality public realm adjacent to key buildings.</p> <p>In order to support the delivery of the key benefits associated with this space we have the following observations to make regarding the site allocation requirements. These comments build on our previous representations and while officers chose not to update the Local Plan originally, we feel that the amended policy context will be key to development coming forward on the site.</p> <ul style="list-style-type: none"> • Site Allocations Boundary – It is unclear why the site to the north of allocation NE9 and west of NE3 is not specifically allocated within the cluster. The delivery of development on this site offers clear benefits to the wider masterplan allowing the hard edges of the Cringle Dock waste transfer station to the south to be mitigated and new public realm including access to the Riverside Walk be delivered. <p>We consider that an appropriately designed building including buffer uses to be entirely appropriate and in accordance with the wider objective of the local plan. The proposed allocation will continue the key public benefits such as public open space associated with the Thames Tideway Tunnel access to the proposed Pimlico Bridge and new active streetscapes.</p> <ul style="list-style-type: none"> • Safeguarded Wharf – As set out previously we support the potential consolidation of Safeguarded Wharf sites to release land for other uses and are pleased to see Policy LP43 has been updated to reflect this approach. <p>In the case of Kirtling Wharf, we consider it a prime example of a constrained site that could be released for other uses. The wharf will be impacted by both the Thames Tideway Tunnel and the emerging proposals for the River Thames Bridge; we would therefore be supportive of its proposed relocation / consolidation with other wharfs.</p> <p>The approach would enable a mixed-use development to be delivered on site securing an important buffer against the harder more industrial use of Cringle Dock and the surrounding residential development.</p>

Notwithstanding this comment we also consider the potential retention of the wharf to be further justification for a consolidated approach to the site as credence will need to be given under the Agent of Change principles.

- Proposed Uses – We strongly support the proposed identification of the site as a mixed-use area in which residential and other commercial uses are deemed as appropriate.

To support the comments above regarding the application boundary; we would request that the new allocation for the site be designated for both residential and / or commercial (Class E).

- Massing Envelope – We support the Council in identifying that the wider cluster is capable of accommodating buildings up to 25 storeys. There is established principle for tall buildings within the area with the recent improvements in accessibility clearly justifying developments of higher densities.

In conclusion, we continue to support the principle of the site allocation on site. We are concerned that the optimal development may not come forward if it is done through fragmented site allocations. We look forward to working with officers to realise the necessary changes to ensure that the site can be delivered as a comprehensive masterplan.

Ballymore strongly supports the recognition within the new Wandsworth Local Plan of the need for additional homes across London. We welcome the amendments to the plan and collaborative nature of the process from the Council. We would like to be clear in our support of many changes made and especially those referenced in this letter.

We believe further work is required to provide certainty to the Kirtling Wharf Cluster Site allocation and look forward to working with the Council to realise these changes.

We trust the above response is of assistance in relation to the Regulation 19 Version of the emerging Local Plan. We look forward to reviewing the outcome of the round of consultation and making further comments on any future change to the Local Plan.

Should you have any questions or wish to discuss, please do not hesitate to contact the undersigned. Yours faithfully,
John Turner

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment agreed. The site allocation boundary could be amended to align with the Safeguarded Wharves Directions map from February 2021.

Proposed Change

Amend the following maps as follows:

Map 3.2 Site Allocation Map - amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Map 5.1 Creative Clusters Map - amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Map 5.2 Nine Elms Spatial Area Map - amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Map 5.3 Kirtling Street Cluster. Spatial Area Map - amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Map 5.5 Kirtling Street Cluster Site Allocation Map - amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

See appendix 1 for illustrated changes to this map.

Consultee Full Name	Ms Leonie Noble
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	138
Title	Area Strategy for Balham
Number	10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Ref: Proposals for Balham</p> <p>I have read the proposals for Balham (where I have lived for twelve years) and studied the interactive maps. Regarding the development of Sainsbury's car park I would like to make the following comments:-</p> <p><u>Layout</u></p> <p>The map appears to show a wall of new buildings around most of the site perimeter with a "communal space" in the centre, - the buildings allocated to be up to a height of 21M or seven stories. This is considerably higher than the terraces in Bedford Hill that face the car park, which are only three stories and benefit from a very open and light aspect at present. It is higher than the supermarket building and without seeing any details appears to be over scale in the context of the existing street space, which is not like the high road, but a zone of more modest terraces. It would not be good to overshadow them.</p> <p>There is already a popular communal space on the North East side of the car park that is well used and includes the rear entrance to the supermarket. Will this be retained? The concept of a larger communal open space is welcome and could be a real asset to this area of the centre if handled well. I am not sure whether this is in the form of a garden square or aiming to be a repetition of Hildreth Street.</p> <p><u>Parking</u></p> <p>I cannot see any reference to what happens to people who need to use a car for shopping - there will have to be some car parking space still retained for shoppers otherwise the surrounding streets will be even more overburdened with parked vehicles than they are already.</p> <p><u>Trees and pollution</u></p> <p>There are 27 trees on the car park site, with shrubs and hedges on the perimeter, including towards the centre of the space 4 large mature trees and two smaller ones that form a specific and valuable group. All the trees have good canopies when in leaf and provide invaluable carbon sequestration and anti pollution qualities for this area of Balham which suffers from increasingly heavy traffic on the high road and Bedford Hill and Station Road.</p>

	<p>Balham High road between the station and Old Devonshire Road road is poor in mature trees -apart from Waitrose car park that has three on the street frontage there are only two in Hildreth Street (semi mature) and two new saplings at the newly paved section of Bedford Hill. The high road itself has too many services in the pavements to introduce new street trees,which makes the existing mature trees highly valuable and they should be protected in any development, in line with Wandsworth Council's Tree Policy ,Trees and Development item 20.</p> <p><u>Density</u></p> <p>My experience of the area over the last few years is that the population has increased to the extent that the high road around the shops can be uncomfortably crowded at times; the station,both underground and overground, also gets overcrowded (certainly pre pandemic) at peak times. The local streets are solidly parked up to the extent that now,with increased delivery vans everywhere, exits like Harberson Road to Bedford Hill are regularly choked by SUVs etc getting jammed trying to pass where the new road arrangement/paving has taken place. There is a problem with rubbish disposal for many residents as exhibited by the endless dumping of bags on street corners at night.Thames water is digging up every street round here because of the failing old pipe systems now having to deal with increased loads from multiple new bathrooms and kitchens.</p> <p>The question is--when is saturation point reached? At what point does increasing the density put too much pressure on the infrastructure and start to damage the quality of an area.Does central Balham really need a large new block of flats right in its heart where at present there is an open zone that provides a resting space beyond the hurly burly of the high road, which could be developed into something really attractive and pleasant for the community to use while retaining the trees and an element of parking for the supermarket. Anything built would best be low-mid rise and as carbon neutral as possible.</p> <p>To cite an example of successful town planning dealing with an open area bounded by busy streets and part of a bus terminus it is worth looking at Clapham Old Town and the way the North Street/Polygon area has been developed , landscaped and planted.It now makes an attractive entrance to Clapham from the North side,while maintaining the character and scale of "place" as well as being functional for the buses.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The open space to the north east of the car park would be retained as communal open space and applicants would be required to enhance the open space as part of any proposal. The suggested location for public open space icon on Map 10.1 which sits at the centre of site allocation BA1 may come forward as an area of communal civic space.</p> <p>The site allocation sets out that development should include the re-provision of the car park in ground floor podium. Detailed provision of the amount and type of parking will be made available with any proposal for development of the site. All proposals will be required to include a detailed construction management plan which will mitigate as much as possible the impact of development on local residents including the requirement for parking which would be displaced.</p> <p>As set out in LP56 Tree Management and Landscaping the Council will resist development that would result in the damage or loss of trees unless it can be shown through an arboricultural or engineers report that the felling would be properly justified and that replacement trees are provided.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Schroders

Consultee Organisation Details	Schroders Real Estate Investment Management
Agent Full Name	Jeremy Castle
Agent Organisation Details	Deloitte LLP
Comment ID	139
Title	Area Strategy for Nine Elms
Number	5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>London Borough of Wandsworth Draft Local Plan: Publication Version (Regulation 19)</p> <p>We write on behalf of our client, Schroder UK Real Estate Fund (“Schroders”), which is the owner of the Battersea Studios site. This response relates to the London Borough of Wandsworth (LBW) Publication Version of the Local Plan (Regulation 19) (“Draft Local Plan”) consultation. The consultation period ends on 28 February 2022.</p> <p>In writing this letter, we do so under the statutory provisions of a Regulation 19 consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012. Background to Battersea Studios</p> <p>Schroders purchased the Battersea Studios site in early 2014. The Battersea Studios site comprises a two- storey building containing office and flexible workspace units, known as Battersea Studios 1 (BS1), and a five-storey building, known as Battersea Studios 2 (BS2), which is also primarily occupied with office and flexible workspace. Overall, Battersea Studios is a campus of office workspace, studios and workshops comprising a total of 9,970 sqm, largely occupied by small and medium sized enterprises.</p> <p>Since acquiring Battersea Studios in 2014, Schroders has facilitated refurbishment works to provide modern workspace and communal spaces for meeting, collaborating and sharing ideas. In addition, Schroders has invested in enhancing on-site facilities, including space for cycle storage, with a view to promoting sustainable transport modes. With strong demand for the workspace already on site at Battersea Studios, Schroders is keen to continue to build on the economic success of Battersea Studios and make best use of the site to provide additional space and facilities for new and expanding businesses. The Battersea Studios campus falls within the Battersea Design and Technology Quarter (BDTQ), as is defined by the Battersea Design & Technology Quarter Economic Appraisal & Design Framework (BDTQ EADF) published in February 1 2020.</p> <p>An application for full planning permission was submitted on 8 February 2021 for a third workspace building at Battersea Studios, referred to as Battersea Studios 3 (BS3). The application related to the erection of a</p> <p>10-storey building in a currently redundant part of the site, with 9 storeys of office space on all floors above ground and light industrial at ground floor, as well as public realm improvements. The proposed development was designed in accordance with local planning policy which recognised the opportunity to maximise the economic potential of land in the borough to provide workspace alongside industrial uses, as is the case at Battersea Studios. This application was formally withdrawn on 23 November 2021 in order to allow further conversations regarding proposed planning conditions and S106 obligations.</p>

Previous Response to Regulation 18 Draft Local Plan

Schroders submitted formal representations in response to the LBW Pre-Publication (Regulation 18) Draft Local Plan on 1 March 2021. As part of the previous consultation, Schroders proposed a series of changes, including:

- Consistent policy support for office workspace above industrial uses within SILs;
- Affordable/managed workspace and tall buildings policy to be amended to best reflect what is realistic and appropriate in the BDTQ;
- Further amendments are also proposed to ensure the accuracy of the BDTQ site allocation; and,
- The inclusion of further supporting text to support BREEAM requirements in new development. Schroders has reviewed the Regulation 19 version of the Draft Local Plan and the Appendix 5: Responses to

Local Plan Pre-Publication Consultation and Officer Comment, both in the context of current and long-term aspirations for the Battersea Studios site, and is pleased to see a number of the proposed amendments have resulted in changes to the plan. However, it is noted below where in Schroders' view comments remain outstanding, or where additional comments are now made.

Local Plan Review Response

Area Strategy for Nine Elms (Battersea Design and Technology Quarter Site Allocation)

Schroders welcomes the introduction of Creative Clusters as shown on Map 5.1, and the 'Vision' text of the Area Strategy for Nine Elms which identifies the opportunity to leverage the Battersea Power Station and Embassy district growth poles to develop the BDTQ. It is felt that this is important in recognising the differing nature of the Battersea Power Station and Embassy district when compared to areas of the BDTQ, but also the important role each of these areas play.

In the Regulation 19 version of the Draft Local Plan, Battersea Studios continues to fall within cluster 'NE8: Silverthorne Road, SW8.' Under 'Uses', Schroders welcomes the addition stating the appropriateness of industrial and office uses on upper floors, especially given the role such an approach will play in intensifying appropriate sites without eroding their industrial function.

Schroders supports the added clarity under 'Building Heights', stating that in Tall Building Zone TB-B3a-02, where Battersea Studios is located, the maximum appropriate height range for the zone is 7 to 11 storeys, but has additional comments relating to tall buildings under Policy LP4.

Schroders understands that LBW has commissioned a review of the EADF. On Schroders, we attended a workshop on 24 February 2022 to discuss the framework. Given how the draft Local Plan refers to the EADF in Policy PM3 and in site allocations within the BTDQ, the Council should confirm the status of its review of the EADF. Most importantly, it needs to ensure that any review of the EADF is not used as a reason to defer the determination of planning applications for development in the area. The EADF is a material consideration in the determination of these applications.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.

Proposed Change

No change considered necessary.

Consultee Full Name	Schroders
Consultee Organisation Details	Schroders Real Estate Investment Management
Agent Full Name	Jeremy Castle
Agent Organisation Details	Deloitte LLP
Comment ID	140
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy PM3 Nine Elms</p> <p>Schroders welcomes the changes to Map 5.4 Spatial Area Map: Battersea Design and Technology Quarter made to reflect previous comments on the Regulation 18 Draft Local Plan. Schroders also remains supportive of the promotion of intensified development and the requirement to provide a mix of uses and scale of development that is consistent with the BDTQ EADF.</p> <p>However, whilst noted in the Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comment document in response to Schroders' previous representations that the language matches that used elsewhere in the Local Plan, it remains Schroders' view that 'suggested building frontage' is an inappropriate definition for the footprint borders for suggested buildings in this location. The industrial nature of the different sites which make up the BDTQ, and the way in which they abut to each other, means it is very unlikely each of the frontages as suggested on the map would be realistically achievable, and as a result solid black lines should also be used to denote likely rear/'back of house' frontages.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support noted.</p> <p>The suggested building frontages shown in Map 5.4 are indicative and used across multiple Spatial Area Maps. They are not to be considered as definitive frontages for development.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Schroders

Consultee Organisation Details	Schroders Real Estate Investment Management
Agent Full Name	Jeremy Castle
Agent Organisation Details	Deloitte LLP
Comment ID	141
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP4 Tall and Mid-Rise Buildings</p> <p>In reviewing the changes made to the draft Local Plan since the Regulation 18 iteration, Schroders recognises the value of having a clearer definition for what constitutes a 'tall' and 'mid-rise' building. Furthermore, Schroders also recognises the clarity that individual tall building zone maps, such as Map 23.13 Tall Building Zone TB-B3a-02 covering Battersea Studios, may bring in making clear where taller buildings are proposed.</p> <p>Whilst Map 23.13 Tall Building Zone TB-B3a-02 shows support for buildings of 7-11 storeys in this location, including Battersea Studios, an updated version of the Arup Urban Design Study (December 2021) explicitly shows support for a 9 storey development at the northern corner of the Battersea Studios site. As a result, we suggest that the colouring of Map 23.13 should be reviewed to show that the area for taller buildings should cover the majority of the area covered by the map, including Battersea Studios. The Council supports the principle of a taller building on the Battersea Studios site, and a revised approach to the map's colouring will be consistent with the policy approach of intensifying use of the industrial area.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. If proposed, it would be up to applicant to justify an alternative approach to the principle of the location of taller elements of a scheme compared to that of the shading as set out within the tall building zones.
Proposed Change	No changes considered necessary

Consultee Full Name	Schroders
Consultee Organisation Details	Schroders Real Estate Investment Management
Agent Full Name	Jeremy Castle
Agent Organisation Details	Deloitte LLP
Comment ID	142
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP33 Promoting and Protecting Offices</p> <p>Schroders notes in Part B of Policy LP33 the addition that “larger businesses will also be appropriate in town centres”. Whilst Schroders recognises why such locations would be appropriate for larger businesses, there may be instances outside of town centre locations, such as the BTDQ, which providing they are well connected by public transport and have the appropriate amenity and facilities, would also be appropriate for larger businesses. In such cases it may be that a development can accommodate space for SMEs, but alongside a tenant of a larger size. As such, Schroders suggests that the policy wording is amended to read “<i>Larger businesses will be predominantly appropriate in town centres, where the provision of flexible and touchdown space will also be encouraged, and will also be appropriate in locations that are suitable for office space, such as the BDTQ</i>”</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The BDTQ concept is not intended to accommodate larger businesses, but rather SMEs. This has long been the aspiration for the redevelopment of this part of the Queenstown Road, Strategic Industrial Location, as is clearly set out in LP34.B.4.a and in the supporting text (see paragraphs 18.32 to 18.35). The Local Plan identifies locations that are appropriate for larger businesses which provide sufficient capacity to meet the identified need, founded on the analysis and recommendations of the Employment Land and Premises Study.
Proposed Change	No change considered necessary.
Consultee Full Name	Schroders
Consultee Organisation Details	Schroders Real Estate Investment Management
Agent Full Name	Jeremy

	Castle
Agent Organisation Details	Deloitte LLP
Comment ID	143
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP38 Affordable and Open Workspace</p> <p>Schroders welcomes the amendment in Policy LP38 to recognise that the requirement for open and/or affordable workspace in developments providing more than 1,000 sqm should be subject to scheme viability.</p> <p>In representations submitted on behalf of Schroders on 1 March 2021, comments were made with regard to the capped rent requirements set out in the draft policy (previously Policy LP41). For the affordable workspace requirement, and the need to provide this at a reduced capped rent, the policy applies a blanket 50% reduction to the entirety of the VNEB OA. This blanket 50% capped rent reduction for the VNEB OA has not been amended in this latest Regulation 19 version of the Draft Local Plan.</p> <p>It remains Schroders' view that the rent levels across the VNEB OA vary greatly, and that whilst a 50% reduction in rent may be appropriate for areas such as the Battersea Power Station regeneration area where significant development is being brought forward, the same reduction is not appropriate for the scale and type of office space offered across the BDTQ area. Taking Battersea Studios as an example, rents are lower than parts of the remainder of the opportunity area, particularly given that developments in the area are targeted towards SMEs. As a result, the financial viability of projects in the BDTQ is more sensitive than commercial developments elsewhere in the VNEB, where higher base rents and lower yields reflect the more corporate nature of target tenants.</p> <p>Due to the difference in rent levels and target tenants, Schroders also does not consider appropriate the comparison of the BDTQ, and as a result Battersea Studios, with Waterloo/Southbank and the Vauxhall Area, as noted in the Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comment document.</p> <p>On this basis, Schroders proposes that draft Policy LP41 should be amended to differentiate the BDTQ from the remainder of the VNEB OA, and should require a 20% capped rent reduction for new affordable workspace within the BDTQ.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	<p>As set out in the Council's previous response to representations made on this issue, the approach set out within LP38 is based on recommendations made within the Employment Land and Premises Study. This document specifically identifies the suitability of the BDTQ area for the provision of affordable workspace, stating (paras 8.55-8.56): "the Council should therefore explore options for providing affordable workspace in these locations in order to maximise the delivery, including in the Battersea Design and Technology Quarter in the Queenstown Road SIL ... For affordable workspace to work in these areas, the discount on rent will need to be substantial considering that market rents, though not at the level they are in the VNEB OA itself, are high".</p> <p>Amendments have already been proposed based on similar representations to introduce a degree of flexibility subject to scheme viability. Should, therefore, the financial viability of a project in the BDTQ area be threaten by scheme viability then this would be treated on a case by case basis as part of the development management process.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Schroders
Consultee Organisation Details	Schroders Real Estate Investment Management
Agent Full Name	Jeremy Castle
Agent Organisation Details	Deloitte LLP
Comment ID	144
Title	LP51 Parking, Servicing and Car Free Development
Number	Policy 62
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP51 Parking, Servicing and Car Free Development</p> <p>Schroders recognises the value of promoting active travel by using public transport to travel within the borough and the role that car-free developments play in this. Schroders also notes that in the Regulation 19 version of the Draft Local Plan, it is now stated that car-free developments will be required within areas with a PTAL rating of 4 or higher, effectively lowering the threshold at which this is required from the PTAL 5 rating previously applied in this policy.</p> <p>Schroders proposes that this policy should make clearer the need to apply such a requirement on case-by- case basis, especially where, as an example, a development’s parking provision may be integral to the nature of tenants and visitors it currently or proposes to serve. Therefore, Schroders proposes that Part D1 of Policy LP51 should be expanded to clarify that car-free development will be required where <i>“The PTAL is 4 or higher, but assessed on a on a case-by-case basis”</i>. This approach is consistent with T6.2 ‘Office Parking’ of the adopted London Plan (2021), where it states that the role of parking at industrial sites varies considerably depending on the location and type of development proposed, and that flexibility may be applied to reflect different trip-generating characteristics and site-specific circumstances.</p> <p>Conclusion</p> <p>To conclude, Schroders considers that the Draft Local Plan can be considered ‘sound’, subject to implementing the recommendations as set out above. To summarise, these are the following:</p> <ul style="list-style-type: none"> • Amending the colouring on Map 23.13 Tall Building Zone TB-B3a-02 to confirm support for taller buildings in the zone; • Making clearer the expectations for building frontages in the BDTQ area;

	<ul style="list-style-type: none"> • Adding the need to assess parking requirements and the siting of larger businesses in town centres on a case-by-case basis; and, • Amending capped rent reduction rates to more accurately reflect varied rent levels across the VNEB OA. <p>Schroders is pleased to have the opportunity to respond to the Regulation 19 consultation on the Draft Local Plan and requests to be informed on the progress of the document. In the interim, if you have any queries, please do not hesitate to contact Phil Wright (phiwright@deloitte.co.uk / +44 20 7303 6106).</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>It is considered that LP51 could clarify that parts D and E are for residential car parking and an amendment could be made.</p> <p>Part D1 is specifically for residential car-parking and the flexibility applied to office and industrial uses would not be appropriate for residential.</p>
Proposed Change	<p>Amend wording in policy LP51 as follows:</p> <p>'D. Car-free <u>residential</u> development will be required where:</p> <p>...</p> <p>E. Low car <u>residential</u> development will be required where:'</p>
Consultee Full Name	Mr James Simpson
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	145
Title	LP27 Housing Standards
Number	Policy 38
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Dear Local Plan Team,</p> <p>On behalf of Habinteg, I would like to respond to the adoption of LP27 into the Wandsworth local plan under section 17.27. As the consultation portal does not offer commenting on this plan section, please see our response below.</p> <p>Item 17.27 references the LP27 housing standards and adopts them into the Wandsworth local plan. Part A, 3 requires: "All new residential development, including new-build dwellings, conversions and change-of-use schemes where new dwellings are created..." to meet policy D7 of the London Plan.</p> <p>This states:</p> <p>"To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:</p> <ol style="list-style-type: none"> 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings.' 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'." <p>Habinteg strongly supports this policy to meet the needs of disabled and older people in Wandsworth.</p> <p>New homes that meet category M4 (2) will deliver:</p> <ul style="list-style-type: none"> • significantly fewer disabled people out of work, further reducing the impact on local government spending* • faster hospital discharges • reduced local government expenditure on more expensive residential care settings • provide a better environment for ongoing independence when needs change, <p>*Research from Habinteg and Papworth Trust reported that disabled people with appropriate, accessible homes are four times more likely to be in work than those in unsuitable properties. Providing suitably accessible homes in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation. Habinteg tenants have reported that having their need for accessible homes met can have wide-ranging positive impacts:</p> <ul style="list-style-type: none"> • .finding and maintaining employment • .Improved family life such as the ability to access their children's rooms or to cook a family meal • .the ability to come and go as they wish to visit family and friends. • 14.1 million people in the UK are disabled (Scope) • 45% of pension age adults are disabled • 1.2 million people use wheelchairs (NHS) • Over 400,000 people nationwide live in homes that do not provide the accessibility they need. • The English Housing survey reported that 91% of existing homes do not provide the four access features for even the lowest level of accessibility – a ' visitable' home. <p>Habinteg's Insight Report: A Forecast for Accessible Homes 2020 found that just 31.5% of homes are required to meet an accessible housing standard between 2020 and 2030. This will compound the national accessible homes deficit.</p> <p>Further information and references:</p> <ol style="list-style-type: none"> 1 Habinteg's in house consultancy Centre for Accessible Environments (CAE) offers bespoke training and consultancy on all aspects of access, including housing, public spaces and community facilities. CAE's services may benefit Croydon's planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team has supported several local authorities and statutory bodies such as Homes England, helping upskill staff in the specific characteristics of accessible housing and providing practical support reviewing development plans and proposals. You can read more on the CAE website at www.CAE.org.uk 2 Housing and Disabled People, a toolkit for local authorities, was a joint project of Habinteg and the Equality and Human Rights Commission published in 2018. The Planning for Accessible Homes chapter provides helpful suggestions for producing robust planning policies for accessible housing. https://www.habinteg.org.uk/ehrc 3 Habinteg's Insight Report: A Forecast for accessible homes assessed accessible housing policy across all local planning authorities in England. You can read the full report and headline findings here. <p>https://www.habinteg.org.uk/localplans/</p>

	<p>ABOUT HABINTEG</p> <p>Habinteg has over 50 years of experience as a registered accessible and inclusive housing provider. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Croydon.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted
Proposed Change	No change considered necessary.
Consultee Full Name	
Consultee Organisation Details	Tooting Development Company
Agent Full Name	ms Lauren whiteley
Agent Organisation Details	
Comment ID	146
Title	LP29 Housing with Shared Facilities
Number	Policy 40
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Representation to Wandsworth Local Plan Regulation 19 Stage Tooting Development Company Ltd</p> <p>We write on behalf of our client, Tooting Development Company Ltd, to submit a representation to the London Borough of Wandsworth (LBW) in response to the following consultation document:</p> <ul style="list-style-type: none"> Wandsworth Local Plan Publication (Regulation 19) Version (January 2022) The consultation period on this document closes on Monday 28th February 2022.

On the whole, whilst we consider the draft Local Plan Review has been positively prepared and is effective, we do not currently consider the other tests of 'soundness' have been met for the reasons set out in this letter and summarised below.

Justified

We do not consider that draft Policy LP29 has been robustly justified as there is no evidence base to support the policy position taken by the Council as this ignores that purpose-built shared-living accommodation is (a) a form of accommodation for which there is an identified need at a borough- and London-wide level, (b) contributes towards housing delivery targets and (c) have the additional benefit of freeing up other housing stock in the borough. Resisting such development is therefore not justified and rather it would be more appropriate for Policy DM29 to require such developments to demonstrate they are satisfying an identified need and contributing towards the creation of mixed and balanced communities.

We do not consider that the requirement in draft Policy LP46 for visitor accommodation to have stays not exceeding 90 days is justified as no evidence has been provided to support this position. As set out, 90 days is a wholly arbitrary figure which is not supported in case law or national or strategic policy. Furthermore, the defining features of a C1 use are not solely based on the length of occupation and the Council has sufficient control over a material change of use to permanent residential accommodation through the enforcement process.

Consistent

Draft Policy LP27 is not consistent with Policy H16 of the London Plan in respect of its requirement to demonstrate that conventional housing is more suitable than large scale purpose built shared

living accommodation. It is also not consistent with LBW's own strategic policy position that seeks to encourage a mix of different types of housing.

Furthermore, as currently drafted Parts (B) and (D) of draft Policy LP46 are inconsistent with the NPPF and London Plan, as it does not explicitly recognise edge of centre locations as a preferable location for hotel development (in the event that town centre locations are unavailable) and it does not allow the application of a sequential test for proposals that seek to extend hotel accommodation.

Subject to these amendments, we consider the draft Local Plan Review would be 'sound' as required by the NPPF.

1 1. Context of the Representation

This representation is prepared on behalf of our client, who owns the site comprising 101a and 111-113 Tooting High Street, London, SW17 0SU (the 'Site') within the London Borough of Wandsworth (LBW).

Planning permission was granted at the Site on 11th August 2020 under application ref: 2019/4999 for the following description of development

Demolition of existing buildings and redevelopment of the site for a part 3/4/5/6-storey scheme, including 4 storeys of basement level, comprising hotel rooms (Class C1), incorporating the rebuild and repositioning of Tooting Constitutional Clubhouse to be used as a cafe facility (Class A3), community use (Class D1/D2) set out over basement and ground floor levels and publicly accessible open space at ground floor level and ancillary refuse and recycling storage, cycle parking, wheelchair parking, servicing arrangements and hard and soft landscaping.

More recently, a non-material amendment to the planning permission ref: 2019/4999 was approved by LBW on 20th January 2022 under application ref: 2021/5376 to omit three levels of basement.

Our client is currently undergoing pre-application discussions with LBW for a proposal to demolish the existing buildings on the Site (in line with the extant permission ref: 2019/4999) and to redevelop the Site to deliver a mixed-use development comprising 170 co-living units (sui generis), with associated communal amenity space, the rebuilding and repositioning of the Tooting Constitutional Clubhouse to be used as a café facility, the provision 551sqm of community floorspace and 651sqm of publicly accessible open space, plus ancillary refuse and recycling storage, cycle parking, wheelchair parking, servicing arrangements and hard and soft landscaping. Pre

These representations are made in light of the above aspirations for the Site.

1 2. Comments on the Draft Local Plan Review (Regulation 19)

The remainder of this letter provides comments on the draft Local Plan.

Draft Policy LP29 Housing with Shared Facilities

Part (C) of draft Policy LP29 states that development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. It goes on to say that such accommodation will only be permitted where:

- 1 1. *"It is proposed on a site which is not suitable for conventional housing;*
- 1 2. *It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and*
- 1 3. *It would not lead to an overconcentration of single person accommodation at the neighbourhood level."*

In the first instance, it is noted that Part C of draft Policy LP29 states that development proposals for large-scale purpose-built shared living accommodation will generally be restricted. We consider this is not consistent with the strategic policy position nor the other policy targets in the emerging Wandsworth Local Plan.

Firstly, the supporting text to Policy H16 of the London Plan acknowledges that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. It notes that this type of accommodation is not restricted to particular groups by occupation or specific needs such as students or nurses, and that this type of accommodation provides an alternative to a traditional flat share as it includes additional services and facilities.

Policy H1 of the London Plan is also clear that the non-self-contained communal accommodation should count towards the borough's housing targets, with paragraph 4.1.9 stating that this should be considered on the basis of 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

Moreover, Draft Policy LP2 (General Development Principles) of the Wandsworth Draft Local Plan specifically states that development proposals must provide for a mix of uses, including for new homes of a mixed-tenure and type.

LBW itself acknowledges the benefits of this type of accommodation within the Local Housing Needs Assessment (LHNA) (December 2020). LBW notes within the assessment that this type of accommodation can provide an alternative to traditional HMO accommodation and the value that it can create for an occupier, can be one of convenience, social interaction and a good quality living environment in terms of access to facilities and accommodation.

It is also noted by LBW within its LHNA that this type of accommodation is a development that is designed around the needs of single, younger people who cannot afford to rent a self-contained home. Therefore, LBW have recognised a large proportion of its residents who would benefit from this type of accommodation.

Therefore, on the basis that large-scale purpose-built shared living units (a) provide an alternative form of accommodation for which there is an identified need at a borough- and London-wide level, (b) contribute towards housing delivery targets and (c) have the additional benefit of freeing up other housing stock in the borough, we do not consider that the starting point should be that such accommodation is resisted. Rather, it would be more appropriate for Policy DM29 to require such developments to demonstrate they are satisfying an identified need and contributing towards the

creation of mixed and balanced communities. This would be more consistent with strategic policy and the approach taken by the Council in granting permission for recent co-living schemes within the borough.

Draft Policy DM29 (C) Policy Tests 1 & 2

Turning to the specific policy tests within draft Policy DM29 Part C, the first two tests require such development to (1) be located on sites which are not suitable for conventional housing and (2) demonstrate that it is better suited to meeting the local housing needs than conventional housing.

We understand that the Council would consider a site as suitable for conventional housing having regard to the following three points as set out in paragraph 17.44:

- whether a proposal would displace existing C3 residential accommodation;
- whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for conventional housing; and
- whether a site has an extant planning permission for C3 housing.

It may be that LBW have included policy tests (1) and (2) as the latest LHNA for Wandsworth outlines that there is an acute need for self-contained residential dwellings, and in particular, affordable housing. The LHNA also states that LBW has a highly mobile population, and due to purpose built shared living accommodation comprising bedrooms, it suits a more transient occupier, which might heighten the mobile population.

Whilst it is recognised that LBW have identified a need for conventional self-contained dwellings within the LHNA, we do not consider that the delivery of purpose-built shared living accommodation would preclude LBW from delivering the required self-contained housing and accommodation that it requires. Rather, the London Plan and emerging Local Plan acknowledge the need for a mix of accommodation types to be provided and the delivery purpose-built shared living accommodation would meet an identified need and contribute towards Wandsworth meeting its housing targets. This includes providing a form of accommodation for people who cannot necessarily afford to live in self-contained residential dwellings.

On the basis that large-scale purpose-built shared living units (a) provide an alternative form of accommodation for which there is an identified need, (b) contribute towards housing delivery targets, (c) contribute to achieving a mix of type of homes and (d) do not preclude LBW from delivering conventional housing, it is unclear why draft Policy LP29 would require

proposals to demonstrate that the site is not suitable for conventional housing and that shared living accommodation is more suitable than conventional housing. We would therefore request that tests (1) and (2) of part (C) of draft Policy LP29 are reworded as follows:

“Applications for large scale purpose built shared living should be accompanied by evidence to demonstrate that the accommodation meets an identified need and ensures an appropriate mix of other uses within the community”

Draft Policy DM29 (C) Policy Test 3

The third test in draft Policy DM29 Part C requires such developments to not lead to an overconcentration of single person accommodation at the neighbourhood level. Similar to tests (1) and (2) of part (C), we do not consider that policy test (3) is consistent with the London Plan. The London Plan does not require developments to demonstrate that there would not be an overconcentration of single person accommodation at neighbourhood level and rather Policy H16 of the London Plan seeks to ensure that there is no overconcentration of uses by requiring developments to demonstrate that they contribute towards mixed and inclusive neighbourhoods. This approach follows from strategic policy GG4 of the London Plan, which states that developments should create mixed and inclusive communities.

The Draft Local Plan defines single person accommodation as including all types of non-self-contained dwellings (such as student accommodation and HMOs) and self-contained studios. LBW has provided no reason as to why they consider the overconcentration of these types of accommodation to be inappropriate nor has it provided any evidence to support this position.

Notwithstanding this, we note that supporting paragraph 17.46 of draft Policy LP29 states that large scale HMOs can potentially lead to residential enclaves shut off from the community. We consider this is wholly unfounded and is not based on any evidence. The whole basis of co-living accommodation is centred on the ethos of communal living, located in sustainable locations so that residents can benefit from local facilities in the area.

Furthermore, we consider that the prevention of the delivery of different forms of single person accommodation at neighbourhood level would be contrary to draft Policy LP2 of the Wandsworth Local Plan. This policy states that development proposals must provide for a mix of uses, including new homes of mixed tenure and types. Single person accommodation encompasses multiple housing types all serving different needs.

Given that single person accommodation comprises a wide range of types of housing that would work to achieve mixed communities, we consider that test (3) of part (C) of draft Policy LP29 should be reworded to remove reference to the overconcentration of single person accommodation and instead, follow a more flexible approach, in line with the London Plan as follows:

“It would contribute to achieving mixed communities at neighbourhood level”

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)

	<p>In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.</p> <p>Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.</p> <p>Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services. Further information regarding this criterion is provided at para 17.46.</p> <p>Whilst the supporting text does suggest that co-living schemes may be isolated, it suggests that this is a potential outcome and goes on to suggest that communal interaction needs to be external as well as internally. This is sufficiently clear.</p> <p>The policy is not intended to prevent the delivery of single person accommodation, and is not contrary to LP2.</p>
Proposed Change	No change considered necessary
Consultee Full Name	
Consultee Organisation Details	Tooting Development Company
Agent Full Name	ms Lauren whiteley
Agent Organisation Details	
Comment ID	147
Title	LP46 Visitor Accommodation
Number	Policy 57
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Draft Policy LP46 Visitor Accommodation</p> <p><i>Draft Policy LP46 Parts (A) and (B)</i></p>

Part (A) of draft Policy LP46 states that proposals for the development of visitor accommodation will be supported in the following locations, where they do not cause unacceptable harm to local amenity and the balance of local land uses:

- 1 1. Town Centres.
- 2 2. The CAZ (outside of wholly residential streets or predominately residential neighbourhoods).

Part (B) goes on to say that outside locations set out in Part A, proposals for new visitor accommodation will be assessed against the sequential test for main town centre uses in accordance with national planning policy, with preference given for sites within Focal Points of Activity over other 'out-of-centre' locations.

In the first instance, we note that draft Policy LP46 does not make reference to 'edge-of-centre locations' and therefore it is currently unclear whether such locations are considered preferable to 'out-of-centre' locations when considering the appropriate location for hotel development.

Paragraph 87 of the NPPF states that hotel uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available should out of centre sites be considered. The NPPF therefore outlines that when applying a sequential test, edge of centre locations are the most preferable location after town centre locations for hotel uses (subject to a sequential test being applied successfully).

The above is also reflected within the London Plan (2021). The London Plan defines tourism and hotel uses as a main town centre use and London Plan Policy SD7 states that boroughs should take a sequential approach to town centre uses. The policy says that these uses should be in town centres or if no suitable town centre sites are available or expected to become available, consideration should be given to sites on edge of centres that are or can be well integrated with the existing centre, local walking and cycle networks, and public transport.

We therefore consider Part (B) of Draft Policy LP46 should be reworded to ensure it aligns with the sequential approach to town centre uses in accordance with the NPPF and London Plan as follows:

- 1 *B. outside locations set out in Part A, proposals for new visitor accommodation will be assessed against the sequential test for main town centre uses in accordance with national planning policy, with preference given for sites within Focal Points of Activity and edge of centre locations over out of centre locations*

Draft Policy LP46 Part (D)

Part (D) of draft Policy LP46 states the following:

"D. Proposals to extend existing visitor accommodation will only be supported in the locations set out in Part A, subject to the other requirements of this policy being met."

Similar to part (B) of this policy, part (D) is inconsistent with the NPPF and the London Plan.

As mentioned, the NPPF states that local planning authorities should apply a sequential test to planning applications for hotel uses. The NPPF says that if town centre locations are not available, edge of centre locations should be considered, and if edge of centre locations are not available, out of centre sites should be considered.

London Plan Policy SD7 states that sequential tests should be applied to main town centre use applications. Policy SD7 goes on to say that if town centre locations are not available, consideration should be given to edge of centre locations, that are well integrated and connected, and if these locations are not available, consideration should be given to out of centre locations.

The draft policy provides no opportunity to apply a sequential test if Town Centre and CAZ locations are not available, and instead implies that extensions to existing visitor accommodation outside of Town Centres and the CAZ will not be supported.

LBW has provided no evidence to justify their approach and why this differs from the NPPF and London Plan. There is no reason to justify why extensions to existing visitor accommodation in areas outside of Town Centres or the CAZ would not be acceptable subject to a sequential test successfully demonstrating that development within a Town Centre or the CAZ would not be achievable.

For the above reasons, we consider that part (D) of the draft Policy LP46 should be reworded as follows:

- 1 *D. Proposals to extend existing visitor accommodation should be supported in the locations set out in Part A, and if suitable sites within these locations are not available, a sequential test should be applied, subject to the other requirements of this policy being met*

Draft Policy LP46 Part (F)

Part (F) of draft Policy LP46 states that proposals for new visitor accommodation must fully address the following requirements:

- 1 *1. "The scale of the proposal would be proportionate to its location"*
- 2 *2. It should not unacceptably harm the balance and mix of uses in the area, including services for the local residential community*
- 3 *3. It would not result in an over-concentration of visitor accommodation at the neighbourhood level. Proposals for new or extended visitor accommodation should include an assessment of impact on neighbouring residential amenity, including cumulative impact taking account of existing visitor accommodation nearby. Where necessary, measures to mitigate harm to residential amenity will be secured through planning obligations.*
- 4 *4. It would be inclusive and accessible, in line with Part H of Policy E10 of the London Plan*
- 5 *5. It would not compromise a site's capacity to meet the need for conventional dwellings.*
- 6 *6. It would provide ancillary facilities which are open for public use and create employment opportunities for local residents (such as restaurants, gyms and conference facilities) unless it is demonstrated not to be feasible because the hotel is too small to accommodate them.*
- 7 *7. It would be managed appropriately as short-term accommodation, with stays not exceeding 90*

consecutive days."

We object to points 6 and 7 of this part of the policy for the following reasons: Draft Policy LP46 Part (F)(6)

This part of the policy requires visitor accommodation to provide ancillary features which are open for public use and create employment opportunities for local residents, unless it is demonstrated not to be feasible because the hotel is too small to accommodate them. This does not consider

the operational differences between hotels or that services provided by hotels vary between the product and market they serve. For instance, a budget hotel will provide a different product and have different operational requirements when compared to a more expensive hotel. On the basis hotels have a wider contribution to the vitality and vibrancy of a local area through external expenditure, we do not consider it is justified to provide publicly accessible ancillary space as part of proposals for visitor accommodation.

Draft Policy LP46 Part (F)(7)

Supporting paragraph 19.47 of draft Policy LP46 states that for proposals within the C1 use class, the Council will ensure that units would not be occupied as permanent accommodation, and conditions will therefore be used to limit the maximum lease lengths for such accommodation. It therefore appears that the requirement for stays to not exceed 90 consecutive days responds to the need to ensure C1 accommodation is not occupied on a permanent basis.

No evidence has been provided by LBW as to why C1 uses should have occupancy restricted to 90 consecutive days and we do not consider that a site's operation within the C1 use class is dependent on the length of visitors' occupation. 90 days is a wholly arbitrary figure which has no support in case law or national or regional policy.

There is no definition of 'short term accommodation' nor is this defined as a separate use class within the Use Class Order. Short term accommodation is a broad term which encompasses several varying models of operation. The defining characteristics of a C1 Use are not simply based solely on length of occupation. Rather there are a number of other considerations, including if the premises is not a sole and permanent residence, payment is made on a nightly basis and the hotel has occupation of a transient nature. Therefore, it is not necessary or appropriate to restrict the occupation of visitor accommodation to 90-days to ensure it operates within the C1 use. On the contrary, the fact that some occupants may stay for longer periods than 90 days does not, in and of itself, necessarily result in a material change of use from a C1 use. A decision would have to be made as a matter of fact and degree having regard to all the relevant characteristics of use.

If the Council were to consider there had been a material change of use and a consented visitor accommodation begun to operate outside of Use Class C1, the Council has adequate control through the enforcement process.

In light of the above, we therefore request that requirement (7) of part (F) of draft Policy LP46 is removed in its entirety.

3. Test of 'Soundness'

Paragraph 35 of the NPPF sets out that Local Plans are considered 'sound' if they are:

- 1 a) **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;
 - 1 b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - 2 c) **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
 - 1 d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Whilst we consider the draft Local Plan Review has been positively prepared and is effective, we do not currently consider the other tests of 'soundness' have been met for the reasons set out in this letter and summarised below.

Justified

We do not consider that draft Policy LP29 has been robustly justified as there is no evidence base to support the policy position taken by the Council as this ignores that purpose-built shared-living accommodation is (a) a form of accommodation for which there is an identified need at a borough- and London-wide level, (b) contributes towards housing delivery targets and (c) have the additional benefit of freeing up other housing stock in the borough. Resisting such development is therefore not justified and rather it would be more appropriate for Policy DM29 to require such developments to demonstrate they are satisfying an identified need and contributing towards the creation of mixed and balanced communities.

We do not consider that the requirement in draft Policy LP46 for visitor accommodation to have stays not exceeding 90 days is justified as no evidence has been provided to support this position. As set out, 90 days is a wholly arbitrary figure which is not supported in case law or national or strategic policy. Furthermore, the defining features of a C1 use are not solely based on the length of occupation and the Council has sufficient control over a material change of use to permanent residential accommodation through the enforcement process.

Consistent

Draft Policy LP27 is not consistent with Policy H16 of the London Plan in respect of its requirement to demonstrate that conventional housing is more suitable than large scale purpose built shared living accommodation. It is also not consistent with LBW's own strategic policy position that seeks to encourage a mix of different types of housing.

Furthermore, as currently drafted Parts (B) and (D) of draft Policy LP46 are inconsistent with the NPPF and London Plan, as it does not explicitly recognise edge of centre locations as a preferable location for hotel development (in the event that town centre locations are unavailable) and it does not allow the application of a sequential test for proposals that seek to extend hotel accommodation.

Subject to these amendments, we consider the draft Local Plan Review would be 'sound' as required by the NPPF.

4. Summary and Conclusions

These representations have been prepared on behalf of London Hotel Group and provide comment on the Wandsworth Local Plan Publication (Regulation 19) Version. We would like to thank you for the opportunity to be involved in the ongoing preparation of the Local Plan. We trust the above comments are clear and helpful.

Whilst our client is supportive of the overall objectives of the Local Plan, we consider a number of amendments are needed, as outlined in this letter, to ensure the Local Plan meets the tests of 'soundness' as defined in the NPPF.

Please do not hesitate to contact if you require any further information. We request that we are kept updated on any future consultation stages regarding the Local Plan document.

Yours faithfully,

Lauren Whiteley

**Change(s)
considered
necessary**

**Wishes to attend
Hearing Session**

Reason why	
Council Response	<p>Comment noted. Part B of the Policy LP46 intends that applications for visitor accommodation will be assessed in accordance with national planning policy. As such, edge-of-centre sites should be sequentially assessed before out-of-centre sites, notwithstanding the preference identified for Focal Points of Activity over other out-of-centre locations. This approach is considered to be consistent with national policy, however it is agreed that this should be clarified to avoid confusion.</p> <p>The approach to extensions set out in Part D is not intended to be read as contrary to national policy, and the sequential test should apply. It is agreed that this should be clarified, but this should be achieved by including reference to extensions in Parts A and B and deleting part D.</p> <p>Part F.6 seeks to ensure that hotel developments provide a wider benefits to the local population beyond external expenditure, however it is recognised that operational differences may prevent this. The policy should be amended to include reference to operational requirements that may prevent such wider benefits from being delivered.</p> <p>Part F.7 seeks to ensure that hotels (C1) remain distinct from homes (C3). It is likely that the 90 day reference relates to the Deregulation Act, which limits short term lets of C3 housing to 90 days to both safeguard the housing stock and to ensure that visitor accommodation is not undermined. This is referenced in Policy LP25. Policy LP46 deals with C1 uses; class C3 uses will be dealt with through housing policies. Specific reference to 90 days in LP46 is not required.</p>
Proposed Change	<p>Amend LP46.A as follows:</p> <p>"Proposals for the development of <i>new or the extension of existing</i> visitor accommodation will be supported in..."</p> <p>Amend LP46.B as follows:</p> <p>"Outside locations set out in Part A, proposals for new <i>or extensions to existing</i> visitor accommodation will be assessed against the sequential test for main town centre uses in accordance with national planning policy, with preference given <i>for edge-of-centre sites first, and then</i> for sites within Focal Points of Activity over other 'out-of-centre' locations."</p> <p>Remove LP46.D and renumber the remaining parts accordingly.</p> <p>Amend LP46.F.6 as follows:</p> <p>"It would provide ancillary facilities which are open for public use and create employment opportunities for local residents (such as restaurants, gyms and conference facilities) unless it is demonstrated not to be feasible because the hotel is too small to accommodate them <i>or due to the operational requirements of the hotel.</i>"</p> <p>Amend LP46.F.7 as follows, "It would be managed appropriately as short term accommodation, with stays not exceeding 90 consecutive days." Delete the final sentence from para 19.47, "Conditions will therefore be used to limit the maximum lease lengths for such accommodation.".</p>

Consultee Full Name	Landlord of the Pines Nursing Home
Consultee Organisation Details	
Agent Full Name	mr Jamie Dempster
Agent Organisation Details	ROK planning
Comment ID	148
Title	LP31 Specialist Housing for Vulnerable People
Number	Policy 42
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>REPRESENTATIONS TO THE REGULATION 19 PUBLICATION OF THE WANDSWORTH DRAFT LOCAL PLAN</p> <p>ROK Planning have been commissioned to make representations in respect of the London Borough of Wandsworth's ('the Council') Local Plan Publication (Regulation 19) Version (January 2022). These representations are made in respect of draft Wandsworth local plan policy LP31 (Specialist housing for vulnerable people), and particularly part LP31 part B(4) (see bold below) which requires affordable housing to be provided for proposals for the development of specialist and supported housing:</p> <p>LP31 Specialist Housing for Vulnerable People</p> <p>Existing specialist and supported housing will be protected where it is considered suitable for its use and meets relevant standards for this form of accommodation. The loss of existing specialist and supported housing will not be supported unless:</p> <p>the applicant can robustly demonstrate that there is no longer an identified need for the retention of the accommodation either in its current format or through the modernisation of the premises; or</p> <p>the needs met by this form of accommodation will be re-provided elsewhere within the borough, resulting in no net loss of overall provision.</p> <p>Proposals for the development of specialist and supported housing will be supported where:</p> <p>the applicant 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;</p> <p>the accommodation is of a high quality and meets relevant best practice guidance for this type of accommodation;</p> <p>the accommodation has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers; and</p> <p>affordable housing is provided, in accordance with Policies H4 and H5 of the London Plan.</p> <p>Use Class Order definition</p>

The Use Class Order ('UCO') defines "care" as: "Personal care for people in need of such care for reasons of old age, disablement, past or present dependence on alcohol, drugs or past or present mental disorder, and Class C2 also includes the personal care of children and medical care and treatment".

The above definition is important in confirming the level of care on site and therefore whether the lawful use can be considered to be Class C2 use. The extra-care offer within the care home should be distinct from sheltered housing developments (i.e. Class C3 use), which provide no care on site and minimal ordinary warden facilities including self-contained units. The distinction between the accommodation within the proposed care home and sheltered housing accommodation is an important one in planning terms and should be clear from the outset as this could result in the need to provide affordable housing for any new development (i.e., for C3 types of accommodation).

Where all residents within the care home receive a basic level of care and have meals provided, with additional care tailored to meet individuals' specific needs and requirements to deliver an integrated care and support environment for frail, elderly residents, this would fall within class C2 use. We consider this further below against the relevant planning policy.

The National Planning Policy Framework (2021) Requirements

Paragraph 35 of the Framework highlights how Local Plans must be examined to assess whether they are prepared in accordance with legal and procedural requirements, and whether they are sound. We have briefly set out below our assessment of the proposed policy intended by the Council to seek affordable housing from various forms and types of care homes in the borough and as contained in the proposed new Wandsworth Local Plan – namely, to be consistent with national, strategic (London Plan) policy and be justified, positively prepared and effective.

- 1 a) Positively prepared – to be positively prepared, the draft Wandsworth Local Plan should be flexible to address any unmet need within the Borough over the whole plan period and from neighbouring authorities where it is reasonable to do so and be consistent with sustainable development. The requirement for affordable housing from care homes, particularly those providing specialist forms of nursing care and rehabilitation could negatively impact on the ability for new care homes of this nature to continue to be delivered, and in locations where they can prosper.
- 1 b) Justified – to be justified, proportionate evidence should have been provided as to how all forms of care home can remain viable if affordable housing is required and this has not been set out.
- 2 c) Effective – to be effective, the draft Wandsworth Local Plan policies, including draft Policy LP31 should assist the Plan to be deliverable over its operational period and based upon effective joint working on cross boundary strategic priorities. Due to the possibility of affordable housing requirement for all forms of care homes, this does not provide Wandsworth, nor its care home providers, with the sufficient flexibility to deliver much needed care home accommodation targets as set within the London Plan, whilst also remaining adaptable to market changes during the plan period.
- 3 d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant, it is clear the requirement for affordable housing for all forms of care home is not practical or viable, particularly where these are in C2 use.

London Plan (2021) Policy Requirements

London Plan Policies H4 (delivering affordable housing) and H5 (threshold approach to applications) set out the affordable housing requirements within London. There is no mention within these policies that developments should require affordable housing provision from class C2 uses; including extra care schemes that fall within the C2 use class.

London Plan Policy H12 sets out the requirement to plan for supported and specialised accommodation for identified need.

London Plan Policy H13 (specialist older persons housing) sets out strategic guidance towards the delivery of specialist and supported housing within the city. At part B(1) it does state, 'affordable housing in accordance with Policy H4 Delivering affordable housing, and Policy H5 Threshold approach to applications'. However, a clear distinction is made in paragraph 4.13.4 which is set out below for clarity.

London Plan para. 4.13.4 states that policy H13 applies to 'specialist older person housing' (as addressed and defined at London Plan para 4.13.6) and does not apply to accommodation that has the following attributes, which is considered 'care home accommodation':

personal care and accommodation are provided together as a package with no clear separation between the two.

the person using the service cannot choose to receive personal care from another provider

people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold.

likely CQC-regulated activity will be 'accommodation for persons who require nursing or personal care'.

It is understood that these policies do not cover 'care homes' themselves, although the London Plan does assert that care home accommodation is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants. To meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. Importantly, we take this to mean, that care home accommodation, i.e., class C2 uses, are not 'related' to this policy and this means no affordable housing is expected or required from such uses at a strategic level.

Notwithstanding the above, the Council states that Draft Wandsworth Local Plan Policy LP31 has been prepared to be consistent with national policy and in general conformity with the London Plan (2021), however we would contend this on the following reasons.

Specific Comments on draft care home policy – LP31 specialist housing for vulnerable people

As a starting point, our client would like to acknowledge and support the Council's intention broadly to promote the delivery of new specialist and supported forms of housing such as care home accommodation. This is an identified and important land use in the borough where there is an unmet need.

Notwithstanding, our client takes issue with a lack of clarity and/ or certainty as to which forms of specialist and supported housing a requirement for affordable housing, as stated in LP31B(4) would apply. Subject to confirmation and clarity on the approach from Wandsworth, our client strongly objects to any requirement for affordable housing for any form of care home accommodation, particularly for those clearly falling within C2 Use.

Paragraph 17.55 includes the following examples of 'specialist and supported housing' to which Wandsworth Draft Policy LP31 applies, and therein creates some confusion as to which forms of care home or specialist housing require affordable housing:

Sheltered housing – commonly self-contained homes with limited on-site support.

Residential care homes – commonly bedsit rooms with shared lounges and eating arrangements.

Nursing homes – similar to residential care, but accommodating ill or frail elderly people, and staffed by qualified nursing staff.

Dual-registered care homes – residential care homes where nursing care is provided for those residents who need it.

Extra-care homes – combinations of the above providing independent living alongside care and support, and sometimes also offering support for older people in the wider community.

Staff accommodation ancillary to a relevant use will also be appropriate.

We have the following concerns:

In line with national and regional planning policy, this policy should not be intended to require affordable housing from class C2 uses.

Wandsworth Draft Local Plan para. 17.55 includes 'residential care homes' and 'nursing homes' and other Class C2 Uses under the examples of 'specialist and supported housing' to which Draft Policy LP31 applies and suggests affordable housing would be required in line with London Plan policies H4 and H5 for care home accommodation. This is because there is no distinction at part B of the policy LP31 despite London Plan policy H13 paragraph 4.13.4 confirming that policies H4 and H5 do not apply to care home development (Class C2). We do not interpret this policy as setting clearly which forms of care home accommodation requires affordable housing, for instance it is noted some forms of extra care accommodation is Class C3 use and does not represent conformity to the London Plan on this basis.

In addition, and to be considered sound, the draft Wandsworth Plan should be positively prepared, and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. For care home accommodation, Wandsworth's Local Housing Needs Assessment (2020) (LHNA) provided in the Draft Local Plan evidence base, identifies how the shortage of specialist housing for older people in Wandsworth has led to a substantial under-occupation of the general housing supply (paras 10.23 -

10.26). The LHNA identifies that the population of Wandsworth is ageing (paras. 11.17 - 11.18) and this leads to an overall need for 1,453 additional dwellings for older person's and an additional 1,258 care- bed spaces by 2037 (para. 11.23). It should be noted draft paragraph 17.57 of the draft Wandsworth plan acknowledges an indicative London Plan annual benchmark for the borough of 120 units of specialist older persons housing.

The current lack of stock is currently resulting in 'bed blocking' whereby patients who are ready to be discharged to an appropriate care home are remaining in hospital beds due to a lack of sufficient care facilities in line with their assessed care needs. This is also acknowledged in London Plan policy H12

which states that specialised accommodation could include reablement accommodation (intensive short- term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation

The COVID-19 outbreak has resulted in additional pressures, such as re-thinking around current stock which has shared bedrooms and bathrooms due to infection control. It is therefore apparent that the current stock is not sufficient in terms of the ever-evolving needs of the population.

When added to the above, requiring affordable housing, in the manner set out by LP31, is counterproductive and has the potential to hinder the delivery of much needed care home accommodation further and significantly in the borough. Clarity is therefore needed on this.

Suggested Policy Wording Change

- 1 The blanket approach to requiring affordable housing, stated at LP31 B(4), from all forms of care home accommodation, including class C2 uses, needs to be removed.
- 1 At the very least the policy wording should be amended and clarified to ensure it plainly sets out, such as at draft paragraph 17.55, and for the avoidance of doubt, which forms of specialist and supported forms of housing, which are more akin to a class C3 use or class C3 element of development proposals, rather than class C2 uses, would be affected by the requirement for affordable housing.

	<p>1 The different forms of care home, specialist and sheltered housing that fall either within class C2 use or class C3 use should be set out clearly in the glossary of the Local Plan.</p> <p>We trust this representation will be considered as part of the consultation and is helpful. We look forward to being informed as to later stages of the plan preparation process. If you should have any questions in the meantime, please do not hesitate to contact Will Thompson on 07921 067 012 or (will.thompson@rokplanning.co.uk), or myself at this office.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy is intended to cover all forms of supported, specialist and assisted housing intended for older people within Use Classes C2 and C3. It does not specifically exclude any, and the supporting text refers, for instance, to care homes, assisted homes and homes for vulnerable people.</p> <p>The requirement for affordable housing applies to all of these. Whilst the requirement for affordable housing on C3 schemes is clear, the London Plan does outline that care homes do contribute to the overall housing need, and in those cases where this form of development meets the requirements of H4 and H5 of the London Plan, affordable housing will be anticipated.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Access Self Storage
Consultee Organisation Details	
Agent Full Name	ms Alexandra Milne
Agent Organisation Details	DP9 Planning
Comment ID	149
Title	LP29 Housing with Shared Facilities
Number	Policy 40
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

**Details of reason(s)
for representation**

Policy LP29 – Housing with Shared Facilities

Part C of this policy relates to large-scale purpose-built shared living accommodation (sui generis) and that it will be “*generally resisted*” unless it meets the following criteria:

- 1) That it is proposed on a site which is not suitable for conventional housing;
- 2) It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and
- 3) It would not lead to an overconcentration of single-person accommodation at the neighbourhood level.

Our clients object to the phrasing of “*generally be resisted*” which is a negative approach and not prepared in a positive manner. This is contrary to paragraph 35 of the National Planning Policy Framework (NPPF) and is neither in general conformity (contrary to section 24(10)(b) of the Planning and Compulsory Purchase Act 2004) nor consistent with Policy H16 of the London Plan which positively supports the principle of shared-living subject to addressing a series of criteria and recognises that this housing product can play a valuable role in meeting London’s housing needs based on a 1.8:1 ratio. This general resistance should therefore be omitted from the policy and our clients would suggest that an approach in line with the London Plan is adopted.

Addressing each of LP29’s criteria in turn: Part 1 – suitable for conventional housing

This policy approach is not justified and is unreasonable as there will be no sites which are not suitable for conventional housing but would be for housing with shared facilities (or any other housing product for that matter). This is not consistent with national or strategic policy which seeks to enable the delivery of sustainable development and not preclude any shared-living development coming forward in its entirety.

Furthermore, this policy approach gives no consideration to the unmet needs of single person households and the important role in which single bedroom units play in reducing the pressure to convert and subdivide existing larger homes thereby indirectly freeing up converted (or informally shared) conventional homes best suited to families. In accordance with paragraph 4.10.4 of the London Plan which states “*One-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes*”.

In addition, the term “conventional housing” is effectively meaningless: “conventional” for whom? Societal changes over many years have resulted in the current wide variety of living arrangements, and to seek a policy for “conventional housing” would fail to reflect the reality of modern-day residential occupation.

Part 2 – better suited to meeting housing need over conventional housing

Shared living meets a different type of housing need to that of conventional C3 housing. Paragraph 4.16.1 of the London Plan recognises that “*Large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs*” and 4.16.3 goes on to state that “*This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities*”. Policy should therefore only be required to demonstrate that it meets an un-met need and suitable for shared living on site, not that it is better suited to meeting the needs of so-called conventional C3 housing.

Regard should also be had to the appeal decision at De Paul House, 628-634 Commercial Road, London, E14 7HS (ref. APP/E5900/W/20/3250665). Similar to draft policy LP29, Tower Hamlets have a local planning policy (D.H7) that requires applications for new houses in multiple occupation to meet a number of criteria, including that the development meets an identified need. The Inspector considered whether there is a distinction between housing need and market demand and ultimately concludes relying on a difference between these goes beyond the relevant policy requirements. The Inspector also dismisses the idea that the existence of nearby co-living schemes would undermine borough-wide need and also dismisses the need to look at a more micro-spatial level with regards to housing need.

Paragraph 17.44 goes on to state that when considering whether shared-living would be located on a site which is suitable for conventional units the Council will have regard to:

- whether a proposal would displace existing C3 residential accommodation;
- whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for conventional housing; and
- whether a site has an extant planning permission for C3 housing.

We are of the view that it is not only appropriate but is good planning for existing C3 residential accommodation to be replaced if it is demonstrated that it is of poor quality and does not meet relevant modern standards, as such replacement would result in higher quality and more efficient development. Shared-living can provide for an attractive residential alternative for those looking

for high quality accommodation with managed and organised communal spaces in a building which is purpose designed and managed to create the sense of community the residents are looking for.

The last two criteria of this policy test should be omitted from the Local Plan on the basis that this does not promote sustainable mixed communities. This does not take into consideration of market / commercial factors when bringing forward development sites, where an extant (i.e not implemented) consent may be found to not be viable, or it may preclude a more efficient and higher quality scheme coming forward. Whether a site is identified in a Council's HELAA for a specific use or not does not also mean it will ultimately come forward as this use.

Part 3 – overconcentration

The policy as drafted does not set out what constitutes “*overconcentration*” within the defined “*neighbourhood level of 800m radius from the site*” and is consequently ambiguous and unjustified. It is also unclear how the arbitrary 800m radius has been arrived at. It would be more appropriate (in the planning sense) to assess shared-living developments on a case-by-case basis, having regard to the location of the site and local circumstances in line with Part A (2) of London Plan Policy H16.

This approach was recently found sound by the Planning Inspectorate for Lambeth Local Plan, where the previous requirement for no more than two shared living uses within a 500m radius was considered unjustified and subsequently deleted from the plan to give the policy more flexibility. Paragraph 119 of the Inspector's Report Dated 22 July 2021 concluded that “*The effect of the [above proposed] changes is to move the policy away from a geographic base to a set of criteria which provide more flexibility*”.

The appeal decision for De Paul House in Tower Hamlets referenced above also required the Planning Inspectorate to grapple with assessing whether the shared-living development would result in overconcentration. The Inspector concluded that the presence of two shared living schemes of 109 units and 139 units within a 3-minute walk would not result in an overconcentration, when considering the nature of the immediate area, in this case with a high predominance of residential accommodation along with some public buildings.

Paragraph 17.42 of the supporting text to this policy outlines that Wandsworth will consider large scale shared living accommodation as developments comprising 30 units or more, which conflicts with the London Plan definition of 50 units or more. Wandsworth justify this approach on the basis that *“This is owing to the significant variances in the character, urban structure and mix of uses across the borough, and the need to ensure development of this scale is appropriate to its location”*. However, the London Plan should take precedent.

Paragraph 17.43 states that *“Large-scale purpose-built shared living accommodation which is defined as a ‘sui generis’ use does not provide an alternative route to affordable housing to people on lower quartile incomes. It is also not necessarily a viable alternative to affordable housing”* and that it *“does not cater for the needs of resident who wish to continue to live within the borough, but rather for a more transient occupier.”*

The Wandsworth Local Housing Needs Assessment (December 2020) (LHNA) states that:

10.42. Firstly, it is important to note the effect on the housing market of delivering significant numbers of 1 bedroom units is to enable those in “room only” and studio dwellings to trade up if they are able to afford to do so, releasing their smaller home back into the market for occupation by households with lower household income. In this way, the provision of 1 bedroom flats should release studios and “room only” household spaces into the market for occupation by less affluent households.

10.43 “Room only” and studios are household spaces that are not provided as affordable homes. The question of their suitability in the Borough therefore solely relates to the market component of overall housing supply.”

Paragraph 10.42 above suggests that single room dwellings would be occupied by less affluent households, thereby providing a form of accommodation that is more affordable based on its size than larger dwellings. Even if the co-living units do not provide a more affordable alternative to studio units or rooms in HMOs, they provide an alternative form housing that contributes to the variety of accommodation in the borough and maximises housing choice. Paragraph 9.3 of the LHNA recognises the Government’s aspirations for a range of housing types and tenures to be provided, including provision for those who wish to rent.

Paragraph 10.48 of the LHNA recognises that the increasing proportion of single person households is forecast to continue. Although the LHNA recommends that preference should be given to larger homes, there is clear need for accommodation for single person households, and this can be met through the co-living accommodation.

Although paragraph 10.48 suggests that studio units are unlikely to contribute to “supporting the creation of stable local neighbourhoods and cohesive communities”, our client would object to this assertion and considers that co-living proposals are capable of being designed to provide a range of high-quality dwellings that will foster a stable community.

As set out in paragraph 10.43 above, co-living dwellings are not typically provided on an affordable basis and a payment in lieu of affordable housing is expected to be provided under the policies within the London Plan. The affordability of these units should therefore not be a consideration as their contribution towards affordable housing is captured through other mechanisms.

Paragraph 17.43 also references that shared living is not considered as a likely sustainable model of development if demand for such accommodation was to reduce in in the long term. This conflicts the findings of the LHNA which forecasts a “*substantial uplift*” in couples without children aged under 65 by 35.9%, and those with just one child, by 33.7%, concluding there is a need for smaller dwellings at Table 29 ‘Demographic Projections’.

Paragraph 17.46 references that shared living can have a negative impact on community interaction (“*residential enclaves shut off from the community at large*”), however, this does not appear to be based on any measurable evidence. While most shared living developments include uses available for the local community to use e.g. commercial or community floorspace, the potential loss of young people from the borough due to an unmet need of good quality housing options is considered to have a much greater negative impact upon the community.

Paragraph 17.47 relates to the management of shared-living developments. This should be updated to reflect the London Plan and GLA Large-scale Purpose-built Shared Living Guidance published January 2022. Notably the minimum requirement for tenancies of no less than 3 months in line with Policy H16 of the London Plan, as opposed to 6 months.

Paragraph 17.48 is no longer required as the LSPBSL sets out clear and detailed guidance as to what the required shared living management plans will need to cover.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted.

The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)

In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.

Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.

The Local Plan does give consideration to the need of single person households by accommodating various forms of housing in the plan that would meet this groups need. The policies are about managing their impact.

Conventional housing is defined in the glossary.

In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.

Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.

The policy seeks to protect existing self-contained housing. If the existing housing is in need of replacement, this will be possible, but its replacement will not solely be in the form of sui generis co-living, and it is not appropriate to raise this specifically in policy LP29.

Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services. Further information regarding this criterion is provided at para 17.46.

The London Plan reference to 50 units is not a threshold and can apply to co-living schemes of less than 50 units. It is provided as a guide. The Wandsworth reference to 30 units is not inappropriate or inconsistent with the London Plan.

The implication of para 10.42 is that less affluent households occupy room only accommodation, which is the case for small scale HMOs. However, the LHNA also states that rooms in co-living schemes are generally more costly than traditional HMOs / room only accommodation, which makes it distinct and may leave people not able to trade up and out of room-only accommodation. As a result of higher rents, co-living only meets the needs of a limited cohort of those seeking accommodation. Co-living is only a small part of the BtR / PRS sector.

The reference in the LHNA para 10.48 to larger homes concerns 1-bed homes as opposed to studios or room only, and makes it clear that it is the larger end of this spectrum that should be prioritised in Wandsworth in order to meet need.

Co-living schemes generally have a shorter tenancy than self-contained housing, and the LHNA reflects this in its use of the word 'unlikely'.

The contribution to affordability is captured in the policy. The LHNA draws on affordability of co-living as a factor in the overall ability of new housing to meet housing needs identified in the borough, and concludes that co-living schemes are not widely available because of the higher rents which necessitate a higher income.

The LHNA seeks to meet this need through a recommendation for studios and 1-bed units, rather than co-living.

The plan uses wording to suggest that these 'can potentially' have a negative impact which, bearing in mind the range and quality of co-living schemes and the possible range of people using them, might be a risk with some schemes.

The January 2022 guidance was in draft. Agreed that the plan should reflect any updated guidance when this is published.

Proposed Change	No change considered necessary
Consultee Full Name	Access Self Storage
Consultee Organisation Details	
Agent Full Name	ms Alexandra Milne
Agent Organisation Details	DP9 Planning
Comment ID	150
Title	LP30 Build to Rent

Number	Policy 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP30 – Build to Rent</p> <p>Our client welcomes the inclusion of this policy which provides in-principle support for Build to Rent housing, subject to following the policy approach contained within the London Plan. In terms of the approach to affordable housing, our client would encourage LBW to introduce flexibility in the consideration of discounted market rents subject to site specific circumstances or the nature of the proposed management of the Build to Rent Units.</p> <p>Part A.3 of this policy states that <i>“Build to Rent housing should provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).”</i> It should be recognised, however, that build to rent accommodation typically attracts a younger cohort of people who are less likely to have families. Policy H10 of the London Plan recognises the role which smaller units play in alleviating the existing pressure on family sized housing. Paragraph 4.10.3 of the London Plan states that well-designed one-and two-bedroom units in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new-build development. Accordingly, we suggest that flexibility is applied to the drafting of Policy LP30 to allow for deviations from the housing mix set out in draft Policy LP24 in the context of Build to Rent developments.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Part A.3 of the policy provides a cross reference to LP24 which seeks the same housing mix in new housing developments. Sufficient flexibility is provided in the criterion by the word, 'should'. This allows for deviations to exist where they can be justified.
Proposed Change	No changes considered necessary.
Consultee Full Name	Brooks Court Management Company
Consultee Organisation Details	
Agent Full Name	Edward Ledwidge
Agent Organisation Details	Partner Montagu Evans

Comment ID	151
Title	NE5 Brooks Court, Kirtling Street, SW8
Number	Statement 25
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LONDON BOROUGH OF WANDSWORTH: LOCAL PLAN FULL REVIEW (JANUARY 2022) PUBLICATION VERSION LOCAL PLAN – REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGS 2012</p> <p>We write on behalf of our client, Brooks Court Management Company who represent the freehold owners of the Brook Court site, Kirtling Street (“the Site”), in response to the London Borough of Wandsworth’s consultation on the proposed Wandsworth Publication Version Draft Local Plan.</p> <p>These representations set out comments on the Pre-publication Draft Local Plan, dated January 2022. Specifically in this letter we comment specifically in relation to Site Allocation NE5 Brooks Court, Kirtling Street, SW8. The following responds to specific policies concerning Site Allocation NE5, Brooks Court, Kirtling Street outlined within the draft Publication Version Local Plan.</p> <p><i>Site Allocation NE5: Brooks Court, Kirtling Street</i></p> <p>The Kirtling Street Cluster comprises five sites, including Brooks Court (NE5) to which these representations relate. The Site is located to the north of Nine Elms Lane and east of Kirtling Street.</p> <p>The Site is to be allocated for residential led development within an area where buildings of 8-25 storeys would be supported. Our client is supportive of this approach in principle.</p> <p>The Site Allocation identifies that consideration should be given to site layout and permeability of the Brook Court sites (NE5) as they will front on to the main access to Battersea Power Station and the pedestrian/cycle route to the proposed Nine Elms Pimlico Bridge and Thames Path, as set out at paragraph 5.40 in the draft Local Plan. The draft Allocation further states that proposals should aim to transform the entrance into a more pleasant place where all users can be accommodated in a balanced way. At paragraph 5.34 of the draft Site Allocation, developments are required to ensure that pedestrian and cycling movements are safe and connected to the cycle network as set out in the NESB Cycling Strategy and support the potential for future onward connection to the proposed Nine Elms Pimlico Bridge and Thames Path.</p> <p>We note that the allocation for Site NE5 has been amended to clarify that the identified route through the Site should be for pedestrians rather than vehicles. Whilst this amendment is supported by our client it would be more appropriate to assess the need for permeability through the Site at the planning application stage having regard to other planned development within the Kirtling Street Cluster. Accordingly the identified route should be identified as part of the aspiration to enhance connectivity in the area and not an absolute policy requirement for the Site.</p> <p>We trust that these observations are useful at this consultation stage. We wish to maintain an active role in the engagement process moving forward, specifically in relation to the Site’s allocation and look forward to receiving an update as LBW proceed through to examination of their new Local Plan.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The route in Map 5.3 Spatial Area Map: Kirtling Cluster does identify a 'suggested/ proposed new pedestrian route' and is considered to be sufficiently flexible to allow for an approach where the individual sites in the cluster collaborate to produce the most appropriate connection as described in the site allocation.
Proposed Change	No change considered necessary

Consultee Full Name	Edward Cox
Consultee Organisation Details	Save Our Balham
Agent Full Name	
Agent Organisation Details	
Comment ID	152
Title	Paragraph
Number	10.16
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>WANDSWORTH DRAFT LOCAL PLAN Consultation ending 28th February 2022 Response of SAVE OUR BALHAM Page 218 Para 10.6</p> <p>Office floorspace in Balham is generally limited to units above ground floor retail premises; however there are several larger more modern premises on the outskirts of the town centre boundary. The quality of these buildings is good, and there is little evidence of vacancy. The Sainsbury's site and car park within the 'Balham triangle' could present an opportunity for redevelopment and intensification of land for a mix of uses in the town centre, particularly were a Crossrail 2 station to be realised here. The environs of Balham station are being considered as a potential station on the future Crossrail 2 link, though Tooting is the current preferred route. In addition to relieving congestion on the Northern Line, this would provide Balham with a rapid and direct connection to major London stations such as Clapham Junction, Victoria, Tottenham Court Road and Euston.</p> <p>Building Design (BDonline), an authoritative industry publication, reported on 10th March 2021:</p> <p><i>"Last November, when TfL and the Department for Transport reached an agreement that saw the former handed £1.8bn to help it out of the financial blackhole caused by the covid-19 pandemic, one of the deal's conditions was TfL winds up consultancy work on Crossrail 2 for the duration of the funding agreement – although this suspension has now become indefinite".</i></p> <p>Because there is no route safeguarded in Balham the redevelopment of Irene House has been undertaken and flats are now available in the former office building which was converted and extended without reference to TFL.</p> <p>The significance of Irene House is that it adjoins Balham Station (mainline and underground) and IF there had been a safeguarded route it would have been on top of it.</p> <p>The only safeguarded route (in Wandsworth) is from Clapham Junction to Tooting Broadway.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	Comments noted. The Council can clarify that Tooting is the Council's preferred location for Crossrail 2.
Proposed Change	No change considered necessary.
Consultee Full Name	Access Self Storage
Consultee Organisation Details	
Agent Full Name	ms Alexandra Milne
Agent Organisation Details	DP9 Planning
Comment ID	153
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP4 Tall and Mid-rise Buildings</p> <p>This policy considers that buildings which are 7 storeys or over will be considered to be tall buildings. It states that <i>"Proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2 to this Plan, where the development would not result in any adverse visual, functional, environmental and cumulative impacts."</i> It further states that <i>"Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area."</i></p> <p>The site is included within the TB-B2-06 Tall Building Zone in Appendix 2 where appropriate heights are set at 7-10 storeys (21-30m). Our client welcomes the site's inclusion within the Tall Building Zone but suggests that the appropriate heights be reviewed to allow for consideration of taller buildings where they can be demonstrated to adequately address the relevant criteria for assessing tall buildings.</p> <p>Our client's proposed development within application ref. 2020/4285 contained building heights ranging from 8 to 13 storeys. The officers' committee report for that application recognises that the proposals would sit comfortably in the context of surrounding massing arrangements and that the proposed 10-storey building proposed to occupy the corner of York Road and Mendip Road would <i>"give emphasis to the corner location and sets it apart from the adjacent blocks which are slightly lower."</i> A detailed assessment of the tall buildings the report concludes that <i>"the tall building proposed is considered to comply with the requirements of the policy DMS4 of the DMPD and London Plan policy D9."</i> Despite the Planning Committee's resolution</p>

	to refuse the application, concern regarding the height of the proposed buildings were not recommended as a reason for refusal. Accordingly, we request that the appropriate heights within Appendix 2 are revised to reflect the heights considered by officers to be acceptable within application ref. 2020/4285 at a minimum, and to allow final heights to be design-led.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA).</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Access Self Storage
Consultee Organisation Details	
Agent Full Name	ms Alexandra Milne
Agent Organisation Details	DP9 Planning
Comment ID	154
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP33 Promoting and Protecting Offices, Policy LP34 Managing Land for Industry and Distribution and Policy LP35 Mixed-Use Development on Economic Land</p> <p>The site is located in an Economic Use Protection Area (EUPA) where draft Policy LP33 states that existing office floorspace is protected and redevelopment will only be supported where inter alia there would be no net loss of office space.</p>

Draft policy LP34 at Part D recognises that mixed-use developments, including residential can come forward on sites in Economic Use Protection Areas and existing industrial land. Part D.1 requires industrial use to be reprovided in line with LP35 and Part D.2 sets out that marketing evidence for an 18-month period should be provided where a loss of protected industrial uses is proposed.

Draft policy LP35 states that *“Proposals for mixed-use development, including residential, will be supported where it meets the criteria for the relevant economic land designation within which it is located”*. In EUPAs, *“Proposals which would result in the existing quantity of office and industrial floorspace both being fully replaced will be supported.”*

Our client broadly welcomes the approach within these policies allowing for mixed-use development on existing industrial and employment sites but suggests that flexibility is considered to allow for the appropriate quantum and type of economic floorspace to be delivered on a site-specific basis and in line with the needs of the market. Non-designated industrial sites, including our client's site can play a vital role in providing flexible economic floorspace that can respond to the evolving needs of the market. Accordingly, we would suggest that this policy is revised to allow for the provision of wider commercial uses within Classes E and B in the redevelopment of existing industrial and office sites rather than strictly requiring the full replacement of these uses. There should also be no resistance within policy for a landowner to increase their commercial floorspace on any given site should they consider it appropriate to do so.

Summary

We trust our comments will be taken on board in progressing the draft Local Plan 2030 and we look forward to engaging further with the Council in the future.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The requirements set out variously within Policies LP33, LP34 and LP35 for the retention and full re-provision of office and industrial uses are justified based on an identified need, which is set out within the borough's Employment Land and Premises Study. The Council consider that Economic Use Protection Areas (among a number of other economic land designations) remain the most suitable locations to accommodate such uses, which also reflects the recommendations of that study. The loss of economic uses to wider commercial uses would undermine the Local Plan's strategy to meet identified needs, and would not be consistent with the NPPF (in particular paragraph 82).
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Margaret Brett
Consultee Organisation Details	Southfields Grid Residents' Association
Agent Full Name	

Agent Organisation Details	
Comment ID	155
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	i am writing on behalf of the Southfields Grid Residents' Association to thank you for taking our concerns about tall buildings in Southfields into account in this version of the Local Plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.

Consultee Full Name	Mark Hale
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	156
Title	Paragraph
Number	5.28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>This submission represents two objections; one from May Hale and one from Mark Hale.</p> <p>We maintain our objection to the inclusion of Nine Elms Pimlico Bridge (NEPB) and its preferred location at Kirtling Street forming part of the second Draft of the Local Plan. We assert there is no compelling case or requirement for the NEPB in itself or in its preferred location. We submit there should be a non-Bridge eventuality added to the second Draft of the Local Plan and NEPB deleted.</p> <p>We also own houseboat Rockland, our home, moored on the outer north side of Nine Elms Pier. We also own houseboat Kasamaja normally moored at Nine Elms Pier but temporarily relocated due to Thames Tideway Tunnel. NEPB would permanently detrimentally impact the amenity of Rockland, Kasamaja and the other houseboats at Nine Elms Pier with harms arising from; construction, disruption, light and noise pollution, security problems, reduced amenity, outlook and market value.</p> <p>We have lived at Nine Elms Pier for over 30 years and the long standing community and valued diversity at Nine Elms Pier is being ignored in order for the preferred location for NEPB to be progressed. This is contrary to the mantra in the Draft Local Plan of ...'People First'. The devastating and detrimental impact on the residents and owners at Nine Elms Pier has been mainly ignored in order to promote the preferred location of NEPB. The community at Nine Elms Pier has existed since 1985 - before the community at Riverlight and Battersea Power Station and many of the other new communities at Nine Elms and yet we at Nine Elms Pier seem to matter less to the NEPB promoters.</p> <p>Our comments and evidence raised to the first Draft of the Local Plan remain relevant and we attach our first representation as evidence.</p> <p>We add further comment below.</p> <p>For ease of reference the second Draft of the Local Plan will be referred to below as the 'Draft Local Plan'.</p> <p><u>SOUNDNESS</u> <u>Positively prepared</u></p>

The inclusion of the NEPB has been consistently rejected by Westminster Council because of its impacts on neighbouring amenity. The Draft Local Plan makes no reference of any support whatsoever from Westminster Council upon which their consent is required to deliver NEPB. This would be crucial in delivering NEPB and Westminster Council's consent should have been established before NEPB's inclusion in the any Draft Local Plan. Hence evidence and justification that the Draft Local Plan should allow for a non-Bridge eventuality.

Justified

There is no appropriate strategy to take into account that NEPB may not happen to take into account Westminster's Council continued opposition

No justification for the choice of the preferred location of NEPB as it was projected to have 40% less demand than two other options (April 2018 Study for NEPB for Wandsworth Council)

Wandsworth Council's own Paper 20-383 states that masterplanning and place making will allow for a '*Bridge or non-Bridge eventualities*' and that **..a number of studies being carried out in the area that are considering scenarios that both include and exclude the Bridge coming forward** and yet the Draft Local Plan prescribes and promotes NEPB as a certainty and provides no alternative for the non-Bridge eventuality. It proves the point precisely that even Wandsworth Council are not confident of its delivery. Therefore, we submit, in order to take into account a reasonable alternative **a non-Bridge eventuality should be included in the Draft Local Plan.**

Covid and the prospect of future pandemics has changed the working dynamics and dependency on working in and commuting to Central London. Working from home at least part-time may now become more relevant - meaning less demand for NEPB. The consequences of COVID will undoubtedly require new modeling to be undertaken to reassess NEPB viability.

There are 20 houseboats and moorings around Nine Elms Pier. It is not identified anywhere in the Draft Local Plan yet some of the moorings sit directly in the path of NEPB. The Draft Local Plan misrepresents the actual NEPB proposal - the bridge is shown as an indicative simple curved dotted line in the Draft Local Plan. The actual design shown to the public in its final design location consultation was a large spiral descent at the north and south landings. The Draft Local Plan does not identify the fact that the south landing of NEPB is actually congested with the NEPB's inappropriate spiral design clashing with the houseboats at the western end of the pier. This is in direct contradiction to the points raised in para 5.28 page 116 .. where it states ... '*The design of open space near the southern landing site of the Nine Elms Pimlico Bridge should be large enough to accommodate the Nine Elms Pimlico Bridge structure and its associated access and maintenance requirements ...*' There is no explanation of how this is achieved without decimating part of the riverboat community. It would be unfair to decimate the riverboat community to place the landing here given there are more viable options elsewhere and with more footfall and which would not harm any other community to the same degree. It is an unjustified decision to use this preferred location in the Draft Local Plan which we submit was chosen due to the 'status' of our community ... ie line of least resistance. It is also a massive misrepresentation and lack of proper consultation by Wandsworth Council to now identify the space needed around the spiral landings without stating how this would impact the houseboat community at Nine Elms Pier. The NEPB consultation was flawed as the space required around the spiral landing was underestimated as evidenced in our first representation (attached to this submission). Infact, following our first representation, instead of recognizing that the spiral design landing to NEPB may not actually be appropriate for this location and protecting the houseboat community, the second Draft has additional wording (para 5.28, page 116) which will attempt to ensure the bridge has priority over a long-standing houseboat community The NEPB consultations did not identify how much space was required around the spiral base without compromising the houseboats and its moorings. Our houseboat Kasamaja and mooring at the western end of the pier will be massively compromised by the NEPB's landing. Infact, NEPB has already unilaterally decided it can remove one houseboat to try and get its large unwieldy spiral landing to fit at the southern landing. We submit wording should be added to the Draft Local Plan that the NEPB will not compromise the existing houseboat community and moorings.

Effective

There is no evidence given on the deliverability of NEPB.

There has been no update to take into account rising construction and land costs or the 'actual demand' for NEPB.

Duty to Co-operate/Legal Obligation

Wandsworth Council's NEPB design team agreed to send us the technical dimensions of the spiral landing of the NEPB as we were concerned it would compromise the existing moorings at Nine Elms Pier. However, this request was not followed through by the NEPB team despite our request and information was withheld. If it transpires the impact on Nine Elms Pier's moorings and houseboats to the west of the pier is greater than submitted in the NEPB design consultation process due to inadequate design and assessment, then we submit the design consultation process was flawed. We submit that if the design of NEPB changes from its spiral design then the design consultation process is also flawed as the locations were based on the spiral design landings. If it transpires that a straight bridge landing is progressed at Kirtling Street, then the public were misled on the appropriateness of the bridge location and design. We submit there may be flawed consultation on the actual design location option at the current preferred location.

The NEPB consultation never provided the option of 'no bridge' versus 'a bridge' option for public comment and assessment.

We confirm we would be happy to take part in the hearing sessions.

Change(s) considered necessary

Wishes to attend Hearing Session

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

Reason why	
Council Response	<p>The proposed Nine Elms-Pimlico Bridge shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. Consideration of a non-Bridge option is also not a Local Plan matter.</p> <p>The local community have been engaged with as part of the preplanning phases of the NEPB project and they will continue to be as the project develops.</p> <p>Paragraph 31.8 of the newly adopted Westminster Local Plan promotes the bridge and states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.</p> <p>The Local Plan refers to the bridge as 'proposed' throughout and does not consider it a certainty. A non-bridge eventuality is not an appropriate consideration for a Local Plan as it is too hypothetical.</p> <p>The theoretical numbers are intended as a guide to understand the need for the bridge and the actual number of users can never be understood and all assessments are predictive and not definitive. Whether a reassessment of the modelling will be undertaken as a result of Covid is not a Local Plan matter.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.</p> <p>It would be the responsibility of the developer to meet the guidance set out in paragraph 5.28.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study Stage 2 report also outlines that Option 4c will not have any impact on the existing houseboat community and therefore amending the Local Plan at this stage to include reference to protecting the existing houseboat community is considered unnecessary.</p> <p>The Local Plan is not prepared by the team responsible for the NEPB and is not in a position to provide the technical dimensions of the spiral landing. The NEPB Consultation is not a part of the Local Plan Consultation.</p>
Proposed Change	Comment noted
Consultee Full Name	May Hale
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	157
Title	Paragraph
Number	5.28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	This submission represents two objections; one from May Hale and one from Mark Hale.

We maintain our objection to the inclusion of Nine Elms Pimlico Bridge (NEPB) and its preferred location at Kirtling Street forming part of the second Draft of the Local Plan. We assert there is no compelling case or requirement for the NEPB in itself or in its preferred location. We submit there should be a non-Bridge eventuality added to the second Draft of the Local Plan and NEPB deleted.

We also own houseboat Rockland, our home, moored on the outer north side of Nine Elms Pier. We also own houseboat Kasamaja normally moored at Nine Elms Pier but temporarily relocated due to Thames Tideway Tunnel. NEPB would permanently detrimentally impact the amenity of Rockland, Kasamaja and the other houseboats at Nine Elms Pier with harms arising from; construction, disruption, light and noise pollution, security problems, reduced amenity, outlook and market value.

We have lived at Nine Elms Pier for over 30 years and the long standing community and valued diversity at Nine Elms Pier is being ignored in order for the preferred location for NEPB to be progressed. This is contrary to the mantra in the Draft Local Plan of ...'People First'. The devastating and detrimental impact on the residents and owners at Nine Elms Pier has been mainly ignored in order to promote the preferred location of NEPB. The community at Nine Elms Pier has existed since 1985 - before the community at Riverlight and Battersea Power Station and many of the other new communities at Nine Elms and yet we at Nine Elms Pier seem to matter less to the NEPB promoters.

Our comments and evidence raised to the first Draft of the Local Plan remain relevant and we attach our first representation as evidence.

We add further comment below.

For ease of reference the second Draft of the Local Plan will be referred to below as the 'Draft Local Plan'.

SOUNDNESS

Positively prepared

The inclusion of the NEPB has been consistently rejected by Westminster Council because of its impacts on neighbouring amenity. The Draft Local Plan makes no reference of any support whatsoever from Westminster Council upon which their consent is required to deliver NEPB. This would be crucial in delivering NEPB and Westminster Council's consent should have been established before NEPB's inclusion in the any Draft Local Plan. Hence evidence and justification that the Draft Local Plan should allow for a non-Bridge eventuality.

Justified

There is no appropriate strategy to take into account that NEPB may not happen to take into account Westminster's Council continued opposition

No justification for the choice of the preferred location of NEPB as it was projected to have 40% less demand than two other options (April 2018 Study for NEPB for Wandsworth Council)

Wandsworth Council's own Paper 20-383 states that masterplanning and place making will allow for a '*Bridge or non-Bridge eventualities*' and that ..'**a number of studies being carried out in the area that are considering scenarios that both include and exclude the Bridge coming forward**' and yet the Draft Local Plan prescribes and promotes NEPB as a certainty and provides no alternative for the non-Bridge eventuality. It proves the point precisely that even Wandsworth Council are not confident of its delivery. Therefore, we submit, in order to take into account a reasonable alternative **a non-Bridge eventuality should be included in the Draft Local Plan.**

Covid and the prospect of future pandemics has changed the working dynamics and dependency on working in and commuting to Central London. Working from home at least part-time may now become more relevant - meaning less demand for NEPB. The consequences of COVID will undoubtedly require new modeling to be undertaken to reassess NEPB viability.

There are 20 houseboats and moorings around Nine Elms Pier. It is not identified anywhere in the Draft Local Plan yet some of the moorings sit directly in the path of NEPB. The Draft Local Plan misrepresents the actual NEPB proposal - the bridge is shown as an indicative simple curved dotted line in the Draft Local Plan. The actual design shown to the public in its final design location consultation was a large spiral descent at the north and south landings. The Draft Local Plan does not identify the fact that the south landing of NEPB is actually congested with the NEPB's inappropriate spiral design clashing with the houseboats at the western end of the pier. This is in direct contradiction to the points raised in para 5.28 page 116 .. where it states ... '*The design of open space near the southern landing site of the Nine Elms Pimlico Bridge should be large enough to accommodate the Nine Elms Pimlico Bridge structure and its associated access and maintenance requirements ...*' There is no explanation of how this is achieved without decimating part of the riverboat community. It would be unfair to decimate the riverboat community to place the landing here given there are more viable options elsewhere and with more footfall and which would not harm any other community to the same degree. It is an unjustified decision to use this preferred location in the Draft Local Plan which we submit was chosen due to the 'status' of our community ... ie line of least resistance. It is also a massive misrepresentation and lack of proper consultation by Wandsworth Council to now identify the space needed around the spiral landings without stating how this would impact the houseboat community at Nine Elms Pier. The NEPB consultation was flawed as the space required around the spiral landing was underestimated as evidenced in our first representation (attached to this submission). Infact, following our first representation, instead of recognizing that the spiral design landing to NEPB may not actually be appropriate for this location and protecting the houseboat community, the second Draft has additional wording (para 5.28, page 116) which will attempt to ensure the bridge has priority over a

	<p>long-standing houseboat community The NEPB consultations did not identify how much space was required around the spiral base without compromising the houseboats and its moorings. Our houseboat Kasamaja and mooring at the western end of the pier will be massively compromised by the NEPB's landing. Infact, NEPB has already unilaterally decided it can remove one houseboat to try and get its large unwieldy spiral landing to fit at the southern landing. We submit wording should be added to the Draft Local Plan that the NEPB will not compromise the existing houseboat community and moorings.</p> <p>Effective</p> <p>There is no evidence given on the deliverability of NEPB.</p> <p>There has been no update to take into account rising construction and land costs or the 'actual demand' for NEPB.</p> <p>Duty to Co-operate/Legal Obligation</p> <p>Wandsworth Council's NEPB design team agreed to send us the technical dimensions of the spiral landing of the NEPB as we were concerned it would compromise the existing moorings at Nine Elms Pier. However, this request was not followed through by the NEPB team despite our request and information was withheld. If it transpires the impact on Nine Elms Pier's moorings and houseboats to the west of the pier is greater than submitted in the NEPB design consultation process due to inadequate design and assessment, then we submit the design consultation process was flawed. We submit that if the design of NEPB changes from its spiral design then the design consultation process is also flawed as the locations were based on the spiral design landings. If it transpires that a straight bridge landing is progressed at Kirtling Street, then the public were misled on the appropriateness of the bridge location and design. We submit there may be flawed consultation on the actual design location option at the current preferred location.</p> <p>The NEPB consultation never provided the option of 'no bridge' versus 'a bridge' option for public comment and assessment.</p> <p>We confirm we would be happy to take part in the hearing sessions.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>The proposed Nine Elms-Pimlico Bridge shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. Consideration of a non-Bridge option is also not a Local Plan matter.</p> <p>The local community have been engaged with as part of the preplanning phases of the NEPB project and they will continue to be as the project develops.</p> <p>Paragraph 31.8 of the newly adopted Westminster Local Plan promotes the bridge and states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.</p> <p>The Local Plan refers to the bridge as 'proposed' throughout and does not consider it a certainty. A non-bridge eventuality is not an appropriate consideration for a Local Plan as it is too hypothetical.</p> <p>The theoretical numbers are intended as a guide to understand the need for the bridge and the actual number of users can never be understood and all assessments are predictive and not definitive. Whether a reassessment of the modelling will be undertaken as a result of Covid is not a Local Plan matter.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.</p> <p>It would be the responsibility of the developer to meet the guidance set out in paragraph 5.28.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study Stage 2 report also outlines that Option 4c will not have any impact on the existing houseboat community and therefore amending the Local Plan at this stage to include reference to protecting the existing houseboat community is considered unnecessary.</p> <p>The Local Plan is not prepared by the team responsible for the NEPB and is not in a position to provide the technical dimensions of the spiral landing. The NEPB Consultation is not a part of the Local Plan Consultation.</p>
Proposed Change	Comment noted

Consultee Full Name	mccarthy and stone
Consultee Organisation Details	McCarthy and Stone UK Ltd
Agent Full Name	Mr Ziyad Thomas
Agent Organisation Details	planning issues
Comment ID	158
Title	LP31 Specialist Housing for Vulnerable People
Number	Policy 42
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>LP31 Specialist Housing for Vulnerable People</p> <p>COMMENT</p> <p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in Retirement Living housing housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.</p> <p>Paragraph 1 of the PPG Housing for Older and Disabled people states:</p> <p><i>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".</i></p>

Table 59 of the *Wandsworth Local Housing Needs Assessment*. (HNA) details that the population aged 65 and over is projected to increase by 14,090 households between 2018 and 2037. The HNA advises that:

11.15 ...the pace of growth in the populations of the recently retired (65-74 age group) in Wandsworth and London is forecast to be faster than in England (47.4% and 51.7% as against 24.1% respectively). Indeed, this trend persists for those in the 75-84 age bracket, although to a lesser degree.

11.16 It is only in the oldest age group, those aged 85+ where the numbers for England exceed those for the other geographies, (91.7% as against 79.5% and 81.6% for Wandsworth and London respectively. This would reflect the older starting population nationally but also the likelihood that some elderly will move out of London as they retire

The HNA advises that there is a requirement for between 1,370 units of specialist older persons' housing and a further 887 care homes spaces to be delivered over the Plan period.

Table 4.3 of the London Plan requires the Borough to deliver 120 units of specialist older persons' accommodation per annum. This generates a requirement of 2,640 units of specialist older persons' housing over the 22-year London Plan period, which is circa 400 spaces higher than the requirements details in the HNA. It is our view that the figures stated in the London Plan are more proportionate to Borough's ageing demographic profile.

Wandsworth's Annual Monitoring Reports (AMR) do not currently monitor the delivery of specialist older persons' housing in the Borough. The *Knight Frank Senior Housing Update 2021* is however a useful reference in this respect and highlights the London Plan target for an additional 4,115 units of specialist older persons' housing per year across the capital up to 2029. Since the start of the London Plan timeline in 2017 however, only 3,000 seniors housing units have been delivered – less than the requirement for one year. There are a further 1,600 further units either under construction or with planning granted across Greater London, which will do little to address the shortfall.

Notwithstanding the above, commend the way the housing needs of older people have been comprehensively addressed in the *Policy LP31 Specialist Housing for Vulnerable People*.

We do however question the requirement under sub-clause B 1) for applicant's to '*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*'. Given the extent of the need for specialist older persons' housing detailed in the Housing Needs Assessment, and the historic under-delivery of these forms of accommodation throughout Greater London – the need is self-evident.

We would, however respectfully, highlight, that despite the largely positive manner which *Policy LP31* addresses the Housing Needs of the elderly, it is undermined by the lack of consideration given to older persons' housing typologies in *Policy LP23: Affordable Housing* and the lack of consideration given to the findings of the *Wandsworth Reg 19 Local Plan Viability Study*. This matter is addressed comprehensively in our representation to *Policy LP23*.

In light of the urgent need to significantly increase the delivery of specialist older persons' housing in the Borough and across Greater London, we consider that it is imperative that the viability of these forms of development is carefully robustly against planning obligations and policy requirements.

	<p>RECOMMENDATION</p> <p>To address the concerns detailed in our representation we would suggest the following amendments to <i>Policy LP31</i>:</p> <ul style="list-style-type: none"> - Sub-clause B. 1) is deleted in its entirety.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy is written with an understanding of the differences in Wandsworth's needs from those of the city as a whole. This approach is considered to be both in conformity with the London Plan and responsive to local pressures. Need is demonstrated strategically in the London Plan, the Local Housing Needs Assessment is more specific to Wandsworth's particular demography. It should be straightforward to demonstrate where supply is not meeting targets. The criteria need to remain to ensure that there is not an over-supply as well as meeting need.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mr ANDREW SIMMS
Consultee Organisation Details	
Agent Full Name	
Agent Organisation Details	
Comment ID	159
Title	PM8 Balham
Number	Policy 9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

<p>Soundness - Complies with Duty to Co-operate?</p>	
<p>Details of reason(s) for representation</p>	<p>Thank you for your invitation to residents to comment on the Wandsworth Local Plan, please find below my response as a resident of Balham to the section <u>PM8 Balham – Area strategy for Balham</u></p> <p>For ease of future correspondence I have numbered my comments.</p> <ol style="list-style-type: none"> 1 Nature of consultation and accessibility 2 Proposed changes to the centre of Balham while difficult fully to visualise based on the information presented for consultation appear significant. As such I am surprised by the low visibility of the consultation exercise in the immediate central Balham area. I was only made aware of its likely implications through a residents social media group. 3 I am replying by letter because the structured form for responding assumes a level of legal and planning expertise that I believe it is unreasonable to expect an average local resident to have, and is one that I do not have. <p>iii. There is an over-emphasis on merely whether residents consider the plans for the centre of Balham to be legal, rather than providing sufficient detailed information to be able to judge whether or not they live up to the outlined objectives of place making, inclusive growth and people first.</p> <ol style="list-style-type: none"> 1 There appears to be both too much information for an optimal consultation exercise, the number and range of legalistic background documents, and too little detail about the actual likely development in Balham to be able to make effective comment against several points. Many broad principles are offered but no clear visualisation that would make it possible to assess the impact, both aesthetic and in terms of local amenity value, or in terms of meeting national net zero development objectives and the objectives of place making, inclusive growth and people first. 2 Vision, objectives and principles of the area strategy for Balham <p>General observations and questions with regard to place-making; inclusive growth; people first:</p> <p>2.1 With regard to: restoring the town centre's character by supporting improvements to existing frontages through sensitive and well-designed intensification, creating well located new homes and offices;</p> <p>a)What proportion of new homes will be social housing, affordable housing and housing at full market rates?</p> <p>b)How will independent local businesses be supported to take advantage of new opportunities within the development as opposed to national chains?</p> <p>c)Will new homes and offices be built to a zero carbon standard?</p> <p>2.2 With regard to: providing an inclusive and connected public realm/open space and encourage urban greening to create a pleasant and people-focused urban environment;</p> <p>d)One area designated in the map 10.1 as new public open space appears to be the same as the existing Bedford Hill place public space, is this the case?</p> <p>2.3 With regard to: supporting measures to reduce the dominance of cars and improve opportunities for active travel, capitalising particularly on the location's comprehensive cycling links;</p> <p>e)This is an admirable objective, yet the notes in 10.21 mention the provision of car parking space on two levels. To reduce the built-in incentive or car use can you confirm that the availability of car parking space is being reduced from its current levels and secure cycle parking being increased, and to what degree in both instances?</p> <p>2.4 With regard to: supporting appropriate development at key gateways to the centre that provide an attractive entrance to the area and create a stronger definition, whilst making more efficient use of under-utilised spaces given over to cars in the allocated site at the eastern end of the town centre.</p> <p>f)In point 10.24 it appears to say that the height of the development could be anything up to 8 storeys in height when the great majority of the surrounding architecture is no more than three storeys high. Building to this height would be out of character with the immediate environment and constitute over-development.</p> <p>3. Summary.</p> <p>3.1 Noting that Wandsworth Council has declared a climate emergency, for the proposed developments in Balham to be compatible they will need to be at least carbon neutral or carbon negative. If not, I do not see that it can be accordance with councils own declared climate objectives, nor national climate policy objectives and commitments and, as a local resident living within a few hundred yards of the proposed development, would not support it.</p> <p>3.2 It is unclear from the information provided with the development will deliver a net increase in active travel infrastructure and a net decrease in provision of car-based infrastructure for the town centre to back up the admirable goal of reducing car dominance. Please clarify with regard to these points.</p> <p>3.3 In terms of delivering inclusivity it is unclear, specifically how the proposed development will meaningfully contribute to this goal. Please clarify with regard to this point.</p>
<p>Change(s) considered necessary</p>	

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The Local Plan Regulation 19 Consultation followed all the necessary national procedures for it to be considered a valid consultation. The questions asked in the consultation reflect the intention of the consultation, to gather opinion and comment as to whether the Publication Local Plan passes the tests of soundness. Previous consultations over the past few years have aimed to seek input from residents about the drafting of the Local Plan.</p> <p>It is not within the powers of planning policy to stipulate the end users of retail developments; however it is noted that PM8.B.2 does state that "Proposals that diversify the existing shopping offer, and which support and enhance the centre's good provision of independent retailers, will also be encouraged within the Town Centre".</p> <p>As set out in LP 10 Responding to the Climate Crisis, all major developments should achieve zero carbon standards, as set out in the London Plan.</p> <p>The area of open space to the north of BA1 Sainsbury's Car Park will be enhanced as part of any proposed development.</p> <p>The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. It would be up to applicant to justify an alternative approach to the principle of the location of taller elements of a scheme compared to that of the shading as set out within the tall building zones.</p> <p>Development proposals exceeding the appropriate height will not be supported on design grounds.</p> <p>Only a small part of the site allocation is considered appropriate for tall buildings as can be seen in tall buildings map. Further detail of the approach and justification for this zones is contained on page 177 of the UDS 2021 - 'The tallest elements of any development should be set well within the zone respecting the scale of the surrounding streets and buildings. Buildings of 7-8 storeys is considered to be the absolute maximum this site could accommodate and this would depend entirely on a high quality design that is carefully placed within the plot in response to all the surrounding constraints and considerations.'</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Major developments within Balham and the borough will be required to achieve zero carbon standards, all non majors will be expected to achieve 35% carbon emission reduction on site. LP10 sets out the full range of policy measures put in place to achieve the Council's ambition of being zero carbon by 2050.</p> <p>Car parking at site allocation BA1 Sainabury's Car Park will be reduced to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels. The expected amount of cycle parking will depend on what type of proposal is submitted. LP51 Parking, Servicing and Car Free Development sets out the Council's requirements for cycle parking in new developments. More detailed information would be provided by an applicant as part of a development proposal.</p> <p>Inclusivity is secured for example, by providing accessible routes for walking and cycling, sustainable travel, affordable housing, providing a mix of uses etc. Further details of the Councils inclusivity aims are contained in the Spatial Strategy for the Plan.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Winstanley and York Road Regeneration LLP
Consultee Organisation Details	
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	160
Title	PM 4 Clapham Junction and York Road/ Winstanley Regeneration Area
Number	Policy 5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	EMERGING POLICY PM4 (CLAPHAM JUNCTION AND YORK ROAD / WINSTANLEY REGENERATION AREA) Part B of Policy PM4 (Clapham Junction and York Road / Winstanley Regeneration Area) relates to inclusive growth and outlines that development within Clapham Junction and York Road/Winstanley Regeneration Area has capacity to provide 2,995 homes by 2032/2033, over the first 10 years of the Plan period. We are of the view that these figures should be stated as “providing a minimum of 2,995 homes...”, which the Council should seek to exceed in order to ensure that housing growth is accommodated in areas with the greatest public transport connectivity and capacity in the Borough, and to reflect the significant number of new homes which will be delivered as part of the regeneration project and the wider Clapham Junction and York Road/Winstanley Regeneration Area.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Policy SDS1 requires a 'minimum' in reference to the entire housing target within which the 2,995 capacity figure for this area is included.
Proposed Change	No change considered necessary.
Consultee Full Name	Winstanley and York Road Regeneration LLP
Consultee Organisation Details	
Agent Full Name	Emily

	Disken
Agent Organisation Details	Montagu Evans
Comment ID	161
Title	CJ5 Winstanley / York Road Regeneration Area, SW11
Number	Statement 40
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>EMERGING SITE ALLOCATION CJ5 (WINSTANLEY / YORK ROAD REGENERATION AREA, SW11)</p> <p>The area which is the subject of the Estate Regeneration Project is allocated within the 'Publication' Draft Local Plan under emerging site allocation CJ5 (Winstanley / York Road Regeneration Area, SW11). Our client supports the allocation for mixed-use development comprising mixed tenure housing, a leisure centre and cultural, commercial and health uses along with convenience shopping, a library, community facilities and open space.</p> <p>Paragraph 6.71 of emerging site allocation CJ5 relates to building heights and states that:</p> <p><i>"In accordance with the tall building maps in Appendix 2, the site is located in tall building zone TB-B1-01. The maximum appropriate height range for the zone is 7 to 20 storeys, and the appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings)."</i></p> <p>The approved masterplan (ref. 2019/0024) consented substantially taller buildings of up to 32 storeys in height, and it follows that buildings in excess of 20 storeys have been considered appropriate on this site. It may be more appropriate for the height policy to give clearer recognition that the heights are based on the Urban Design Study which does not take account of the full range of considerations relevant to determining the acceptability of the height of tall buildings. In addition, the role of tall buildings in contributing towards the supply of new homes in the Borough and the delivery of significant physical, social and economic benefits associated with the wider regeneration of the estates should be recognised further in the site allocation.</p> <p>Paragraph 6.65 of emerging site allocation CJ5 states: "Relevant Management Plans – Any proposals will be required to comply with the guidance set out in the approved York Road / Winstanley Regeneration Area Masterplan and the Lombard Road / York Road Riverside Focal Point Supplementary Planning Guidance (2015)." It is unclear, however, what documents make up the 'guidance' within the approved York Road / Winstanley Regeneration Area Masterplan that proposals are required to comply with and our client would like this to be clarified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	<p>Comment noted. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p> <p>The specific document is the Developing the Preferred Option Winstanley and York Road Estates Report to Housing and Regeneration Scrutiny and Oversight Committee January 2015.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Winstanley and York Road Regeneration LLP
Consultee Organisation Details	
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	162
Title	CJ3 Land on the corner of Grant Road and Falcon Road, SW11
Number	Statement 38
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>EMERGING SITE ALLOCATION CJ3 (LAND ON THE CORNER OF GRANT ROAD AND FALCON ROAD, SW11)</p> <p>The initial master planning exercise for the regeneration of the Winstanley / York Road Estates also included an area known as Bramlands, which is located directly to the north of Clapham Junction station and is allocated within the 'Publication' Draft Local Plan under site allocation CJ3 (Land on the Corner of Grant Road and Falcon Road, SW11).</p> <p>This site has the potential to facilitate and support the objectives of the Estate Regeneration Project due to its proximity and relationship to the site. However, it also has the potential to contribute to the Plan's growth objectives through the delivery of a dense development which takes advantage of its highly sustainable location next to an existing transport hub, in line with the national policy which requires planning policies and decisions to optimise development potential. In this regard, our client considers that the emerging site allocation should be clear that the development of this site should be design and townscape led, in accordance with the London Plan's approach to optimise capacity for site allocations, and considered in the context of the wider Estate Regeneration Project. Our client supports the inclusion of part of the site within the Urban Heart Masterplan boundary and looks forward to working with the Council and Partners to help unlock it's capacity for growth and contribution to the wider Estate Regeneration Project.</p> <p>The emerging site allocation recognises the potential for development or meanwhile uses in the short-medium term as part of the phased development of the site following confirmation of the likely delivery period for Crossrail 2. Our client welcomes the recognition of opportunities for development of the site in the short-term to contribute towards housing need to achieve</p>

	<p>the growth objectives of the Plan, and we would welcome a flexible approach in bringing forward development in order to avoid sterilisation of the site as a result of the ongoing uncertainty surrounding the delivery of Crossrail 2.</p> <p>We also note that <i>Map 6.1 Spatial Area Map: Clapham Junction and Winstanley / York Road Regeneration Area – Inset Map</i> at page 146 of the Plan refers to the site as 'No.4' instead of 'No.3' and request that this is amended for consistency with Map 6.2.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The site allocation has been drafted in accordance with the UDS 2021 which is a design-led document. The approach to meeting the borough's housing needs has been considered in the Council's Housing and Economic Land Availability Assessment (HELAA), which forms part of the evidence base underpinning the Local Plan. The tall and mid-rise buildings policy approach, informed by the Urban Design Study (and the design-led approach it employs) has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery.</p> <p>Map 6.1 - Due to an administrative error this minor numbering was overlooked and could be amended.</p> <p>Support for the use of the site to accommodate meanwhile uses is noted.</p>
Proposed Change	<p>Amend Map 6.1 Spatial Area Map Clapham Junction and Winstanley York Road Regeneration Area as follows:</p> <p>Switch the numbers '3' and '4' over site allocations CJ3 and CJ4.</p>
Consultee Full Name	Winstanley and York Road Regeneration LLP
Consultee Organisation Details	
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	163
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>EMERGING POLICY LP4: TALL BUILDINGS AND THE COUNCIL'S URBAN DESIGN STUDY</p> <p>Supporting Paragraph 14.28 of the 'Publication' Draft Local Plan recognises that some developments will have different floor heights, particularly at the ground floor. To ensure that this is reflected throughout the Plan, we suggest that supporting paragraph 14.34 is amended as follows:</p> <p><i>"14.34. The heights expressed in all parts of this Policy assume an average storey height of three metres. Proposals for commercial premises should be consistent with the parameters set by the height in metres for the identified number of residential storeys. Applications for tall buildings will be required to express the height of buildings in storeys and metres."</i></p> <p>SUMMARY</p> <p>The representations are submitted on behalf of the JV in respect of the Winstanley and York Road Regeneration Project.</p> <p>The JV have requested that we make representations on the 'Publication' Draft Local Plan as they wish to maintain their position as a key stakeholder in the comprehensive redevelopment of the Winstanley / York Road Regeneration Area.</p> <p>On behalf of the JV, we welcome the recognition within the 'Publication' Draft Local Plan of the opportunities to accommodate growth and support renewal and regeneration within the York Road/Winstanley Regeneration Area. The JV is keen to continue working collaboratively with the Council to help facilitate this growth and ensure the successful delivery of the masterplan project to create an attractive new neighbourhood for both existing and new residents.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>Building heights expressed in storeys is considered to be a useful consistent approach with what is a recognised approach, easy to understand and in accordance with the London Plan. As stated in paragraph 14.34, requesting heights in storeys and meters will allay any confusion as to the actual height to enable effective application of LP4.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Lucinda Robinson
Consultee Organisation Details	Marine Management Organisation
Agent Full Name	
Agent Organisation Details	
Comment ID	164
Title	Paragraph
Number	21.48
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Further points to note</p> <p>Section 21.48: You refer to the South East Marine Plan . Alongside this, you could refer to the South East marine plans remit which covers both the marine area and tidal rivers and extends up to Mean High Water Springs where there is an overlap with terrestrial planning.</p> <p>We recommend that the consultation document contains a reference to the duty to co- operate with the Marine Management Organisation.</p> <p>It should also be noted that working with the MMO can aid the success of the Local Plan and can ensure the policies are not in conflict with the marine plan policies.</p> <p>The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.</p> <p>I believe your council did attend a South East Marine Plan Implementation Training session in March 2021. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded webinar which supported the Consultation of the South East Marine Plan. Please let me know if you have any questions regarding implementation of the marine plan.</p> <p>As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information:</p> <p>South East Marine Plan and Explore Marine Plans.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Duty to Co-operate Statement does include reference to the Marine Management Organisation. The Local Plan includes reference to the South East Marine Plan which is considered sufficient.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Bridget Fox
Consultee Organisation Details	Regional External Affairs Officer (South East) The Woodland Trust
Agent Full Name	
Agent Organisation Details	
Comment ID	165
Title	LP53 Protection and Enhancement of Green and Blue Infrastructure
Number	Policy 64
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	The Woodland Trust has no objection to the publication draft of the Wandsworth Local Plan. Policy LP53: We note and welcome the improvement to the drafting of policy LP53 Protection and Enhancement of Green and Blue Infrastructure, reflecting comments made by the Trust in the Reg 18 consultation.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Ms Bridget Fox
Consultee Organisation Details	Regional External Affairs Officer (South East) The Woodland Trust
Agent Full Name	
Agent Organisation Details	
Comment ID	166
Title	LP55 Biodiversity
Number	Policy 66
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy LP55: The Woodland Trust welcomes policy to protect and enhance biodiversity, but would like to see this policy wording strengthened if it is to fit with the Council's aspiration to be the greenest inner London borough. We support setting a greater than 10% target for net gain. By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice.
Change(s) considered necessary	Policy LP55 Biodiversity B.2: after the words "net gain" add "of at least 10 per cent"
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	LP55 Biodiversity is in accordance with the London Plan and the requirements of the Environment Act. Requiring a greater amount is not justified as there is no evidence base to support it.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Bridget Fox
Consultee Organisation Details	Regional External Affairs Officer (South East) The Woodland Trust
Agent Full Name	
Agent Organisation Details	

Comment ID	167
Title	LP56 Tree Management and Landscaping
Number	Policy 67
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP56: The Woodland Trust welcomes this policy. In particular, we strongly support the requirement for retention and protection of existing trees and landscape features, including veteran trees; the incorporation of new trees, shrubs and other vegetation of landscape significance; and ensuring that development protects, respects, contributes to and enhances trees and landscapes. We welcome the policy that existing trees, green spaces, and hedges, should be integrated, protected and enhanced in new developments. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide.</p> <p>We recommend strengthening this policy further to comply better with emerging policy in the England Trees Action Plan and from the Environment Act, including the requirements for Biodiversity Net Gain and for Local Nature Recovery Networks.</p>
Change(s) considered necessary	<p>Policy LP56 Tree Management and Landscaping</p> <p>B We recommend setting a target for canopy cover in new developments of a least 30%, to be delivered by a mixture of tree retention, tree replacement and new planting.</p> <p>C.3 We recommend a robust policy requiring greater than 1:1 replacement where trees are unavoidably lost, setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>C.4 We would recommend adding a minimum 50m buffer for ancient woodland.</p> <p>C.7 We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience.</p>
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>LP55 Biodiversity requires developments to be in line with the Environment Act.</p> <p>LP56 Tree Management and Landscaping currently protects and sets requirements for replacement trees. Evidence of the incorporation of new trees would be sought in accordance with the policy and canopy cover would be considered. LP57 Urban Greening Factor would also assist to increase the borough's canopy cover.</p> <p>The request to add a 50m buffer for ancient woodland is not considered necessary as Tree surveys/Arboricultural reports are required as part of the Councils Local Planning Application Requirements where trees may be affected. The scope and need for a report is considered by the Council's specialist tree officers at pre-app and application stage.</p> <p>As per LP56 C.7, when considering new trees native species are encouraged where appropriate.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	169
Title	LP29 Housing with Shared Facilities
Number	Policy 40
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP29 – Housing with Shared Facilities</p> <p>Part C of LP29 relates to large-scale purpose-built shared living accommodation (sui generis) and states that it will be “<i>generally resisted</i>” unless it meets the following criteria:</p> <ol style="list-style-type: none"> 1) That it is proposed on a site which is not suitable for conventional housing; 2) It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and 3) It would not lead to an overconcentration of single-person accommodation at the neighbourhood level. <p>As per our previous representations, we maintain that phrasing of “<i>generally be resisted</i>” is inconsistent with the presumption in favour of sustainable development, contrary to paragraph 35 of the National Planning Policy Framework (NPPF). Furthermore, it is plainly inconsistent with Policy H16 of the London Plan which <u>supports</u> the principle of shared-living subject to addressing a series of criteria and recognises that this housing product can play a valuable role in meeting London’s housing needs based on a 1.8:1 ratio. Policy LP29 therefore needs to be re- written to bring it in line with H16.</p> <p>It is estimated that there are over c.1 million full time workers who presently live and work in London who would be able to afford this type of housing (ASHE 2021) assuming an average rent of c.£1,000 PCM (in line with that proposed by the respondent). Many of these individuals would not however be able to afford to buy or rent a one-bedroom home.</p> <p>We acknowledge the Council’s concerns (as per its Regulation 18 consultation response) that “<i>a more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing or other Local Plan priority uses</i>” as well as precluding the delivery of genuinely affordable housing tenures, on the basis that it is non-self-contained accommodation. However, in reality, there are a very small number of other shared-living schemes coming forward in the borough, with the current or planned shared-living schemes in Wandsworth (excluding the application at 57-59 Lombard Road) providing just 1,040 shared-living units (and residents). This equates to only 0.3% of total residents (330,000) across the borough, as acknowledged by Officers in their assessment for shared-living application 2021/5013 at 3 Culvert Road. Secondly, shared-living</p>

schemes also secure a financial contribution towards affordable housing as per London Plan Policy H16 with the intention of being spent on C3 housing. On this basis, the Council's overarching concern is clearly misconceived.

Part 1 – suitable for conventional housing

This policy approach is not justified and is plainly unreasonable as any site that is suitable for

shared living will also be suitable for conventional housing. The policy is clearly not positively prepared given that this criterion would effectively rule out any shared living schemes coming forward in the Borough.

Furthermore, this policy approach gives no consideration to the un-met needs of single person households and the important role in which single bedroom units play in reducing the pressure to convert and subdivide existing larger homes thereby indirectly freeing up converted (or informally shared) conventional homes best suited to families. In accordance with paragraph 4.10.4 of the London Plan which states “*One-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes*”.

Reduced demand for shared housing (where an enhanced quality alternative is provided) is evidenced by trends in Purpose Built Student Accommodation (PBSA). Over 1/3 of students now live in PBSA as a result of enhanced quality (Knight Frank 2021). Reduced demand for traditional shared housing reduces upward price pressure on rents and the long term returns achieved by buy to let landlords (making it more difficult for them to outbid families for conventional homes). This means existing buy to let homes can be returned to use as family homes when they are sold. It has also been established in recent co-living appeals that the delivery of this type of housing can free up family homes. In appeal reference APP/F5540/W/20/3260357 in LB Hounslow the inspector concluded that: “*It would assist in the delivery of different types of homes to meet the diverse needs of London’s communities. Further, it would serve to relieve pressure on shared private accommodation, such as houses in multiple occupation and thereby could release housing suitable for families. In this respect it would contribute towards mixed and inclusive neighbourhoods.*” This is particularly important for LBW who have a higher proportion of converted housing (19.73%) than London as a whole (12.24%) (ONS 2021, Census 2011).

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted.

The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)

In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.

Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.

The LHNA does consider the need of single person households and draws the conclusion that their needs are best served through the provision of studios and 1-bed units. The LHNA recognises the contribution of 'room-only' accommodation, but expresses concern over co-living schemes where rents may be higher than HMOs and have a limited impact in meeting overall need. It recommends an approach that prioritises conventional housing over co-living.

The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)

	It is also questionable whether PBSA / co-living will release HMOs if new developments are meeting the needs of new demand or a growing student population, a point which is often raised in appeals.
Proposed Change	No changes considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	170
Title	Paragraph
Number	17.44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Part 2 – better suited to meeting housing need over conventional housing</u></p> <p>Again, it would be impossible for any applicant to meet this criterion. Shared living meets a different type of housing need to that of conventional C3 housing. Paragraph 4.16.1 of the London Plan recognises that “<i>Large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs</i>” and 4.16.3 goes on to state that “<i>This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities</i>”. Policy should therefore only be required to demonstrate that it meets an un-met need and suitable for shared-living on site, not that it is better suited to meeting the needs of conventional C3 housing. This approach is not sound or justified.</p> <p><u>Paragraph 17.44</u> goes on to state that when considering whether shared-living would be located on a site which is suitable for conventional units the Council will have regard to:</p> <ul style="list-style-type: none"> - whether a proposal would displace existing C3 residential accommodation; - whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for conventional housing; and - whether a site has an extant planning permission for C3 housing.
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	<p>Comment noted.</p> <p>In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.</p> <p>Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.</p> <p>The policy seeks to protect existing self-contained housing. If the existing housing is in need of replacement, this will be possible, but it's replacement will not solely be in the form of sui generis co-living, and it is not appropriate to raise this specifically in policy LP29.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	171
Title	Paragraph
Number	17.47
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Paragraph 17.74 should be deleted in its entirety given that the “suitability for C3 housing” test is demonstrably unsound. Without prejudice to that position and with regard to the first bullet point, we are of the view that it can be appropriate for existing C3 residential accommodation to be displaced for example if it is demonstrated that it is of poor quality and does not meet relevant modern standards, in favour of higher quality and more efficient development. Shared- living can provide for an attractive residential alternative for those looking for high quality accommodation with managed and organised communal spaces in a building which is purpose designed and managed to create the sense of community the residents are looking for. Approximately 21% of Private Rental Homes fail basic decent homes standards (with many being classed as hazardous (English Housing Survey 2021). The problems associated with this type of housing have also been highlighted by the COVID19 pandemic which illustrated those living in shared rental housing have on average just 10 square meters of private space to live and work from (LSE 2020).</p> <p>The last two criteria of this policy test should be omitted from the Local Plan on the basis that this does not promote sustainable mixed communities. It is therefore not sound as it conflicts with the objectives of the NPPF. This policy does not also take into consideration market / commercial factors when bringing forward development sites, where an extant (i.e not completed) consent may be found to not be viable, or it may preclude a higher quality scheme coming forward which could provide housing for a larger number of Wandsworth’s residents who presently reside in unsuitable buy to let housing which does not meet their needs. Whether a site is identified in a Council’s HELAA for a specific use or not does not also mean it will ultimately come forward as this use. As previously noted, shared-living can play a valuable role in meeting London’s housing needs based on a 1.8:1 ratio whilst diversifying the housing stock. Part</p>

	<p>of LBW's Objectively Assessed Housing Need also comprises single person households. Delivering shared living therefore contributes to meeting it. ONS evidence shows that the number of multi-person households (unrelated adults sharing) is expected to increase significantly in the coming years. The current pipeline of planning permissions for good quality/ suitable homes is insufficient to meet this need.</p> <p>Part 2 of Policy LP29 is therefore not justified, and it should only be required to demonstrate that it meets an un-met need and is a suitable site for shared living, not that it is <u>better suited</u> over meeting the needs of conventional C3 housing.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy seeks to protect existing self-contained housing. If the existing housing is in need of replacement, this will be possible, but it's replacement will not solely be in the form of sui generis co-living, and it is not appropriate to raise this specifically in policy LP29.</p> <p>The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	173
Title	Paragraph
Number	17.43
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p><u>Paragraph 17.43</u> references that shared living does not meet the needs of lower quartile incomes and is more expensive than affordable rented accommodation. While shared living meets the needs of intermediate households on median wages who can't afford to buy - it is not 'affordable housing' and should not be required to meet affordability tests as per private sale housing. These schemes provide off-site affordable via a commuted sum. Off-site affordable can deliver more affordable housing (improved value for money) which is better suited to the needs (single storey family homes) it seeks to meet and can be delivered faster (funding schemes ready to start construction).</p> <p><u>Paragraph 17.43</u> also references that the private space consists solely of bedrooms and therefore does not cater for the needs of residents who wish to continue to live within the borough, but rather for a more 'transient' occupier. We understand this has been informed by the December 2020 Housing Needs Assessment by GL Hearn. It should be clarified that the private space of shared-living developments such as Greystar's is larger than a typical HMO or informal shared dwelling for single person households, in addition to a generous amount of high quality shared communal internal and external amenity space. These units are more akin to C3 studios in layout as opposed to bedrooms, including kitchenettes and living space.</p> <p>It is also considered that <u>Paragraph 17.43</u> applies a negative connotation to transient occupiers and does not reflect the fact that they support the delivery of core services and economic growth in the Borough. It is considered that shared-living products also caters the needs of residents who wish to continue to live in Wandsworth by providing a route to save for ownership. We note that this is not a policy requirement for Build to Rent schemes (Policy LP30) and question whether there is any evidence to suggest that shared-living is any more 'transient' than this product or private buy to let housing?</p> <p>Lastly, <u>Paragraph 17.43</u> references that shared living is not considered as a likely sustainable model of development if demand for such accommodation was to reduce in the long term. This conflicts with the findings of the Housing Needs Assessment December 2020 which forecasts a "<i>substantial uplift</i>" in couples without children aged under 65 by 35.9%, and those with just one child, by 33.7%, concluding there is a need for smaller dwellings at Table 29 'Demographic Projections'.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Despite this, it remains that the units are not C3 studios and cannot be considered as self contained units. Tenancies are also generally for a short term.</p> <p>The LHNA identifies a substantial need for studios and 1-bed homes to meet existing need and prioritises this above co-living schemes in order to address this need. Transient occupiers may be part of the workforce which delivers core services and economic growth.</p> <p>The LHNA seeks to meet this need through a recommendation for studios and 1-bed units, rather than co-living.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	174
Title	Paragraph
Number	17.42
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<u>Paragraph 17.42</u> outlines that Wandsworth will consider large scale shared living accommodation as developments comprising 30 units or more, conflicting with the London Plan definition of 50 units or more. Wandsworth justify this approach on the basis that “ <i>This is owing to the significant variances in the character, urban structure and mix of uses across the borough, and the need to ensure development of this scale is appropriate to its location</i> ”. However, the London Plan should take precedent.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The London Plan reference to 50 units is not a threshold and can apply to co-living schemes of less than 50 units. It is provided as a guide. The Wandsworth reference to 30 units is not inappropriate or inconsistent with the London Plan.
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9

Comment ID	175
Title	LP29 Housing with Shared Facilities
Number	Policy 40
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Part 3 – <u>overconcentration</u></p> <p>Part A (2) of Policy H16 of the London Plan requires housing with shared facilities to “<i>contribute towards mixed and inclusive neighbourhoods</i>”, amongst other criteria. This criterion of Draft LP29 is therefore unnecessary as it is already assessed under strategic policy H16 and should be deleted.</p> <p>Notwithstanding, the policy as currently drafted does not explicitly set out what constitutes “<i>overconcentration</i>” within the defined “<i>neighbourhood level of 800m radius from the site</i>” and is consequently ambiguous and unjustified. It is also unclear how the 800m radius has been arrived at and whether it is based on any evidence. We consider that it would be more effective to assess shared-living developments on a case-by-case basis, having regard to the local need, location of the site and local circumstances, including demographics make-up, in line with Part A (2) of London Plan Policy H16.</p> <p>This suggested approach was recently found sound by the Planning Inspectorate for Lambeth Local Plan, where the previous requirement for no more than two shared living uses within a 500m radius was considered unjustified and subsequently deleted from the plan to give the policy more flexibility. Paragraph 119 of the Inspector’s Report Dated 22 July 2021 concluded that “<i>The effect of the [above proposed] changes is to move the policy away from a geographic base to a set of criteria which provide more flexibility</i>”.</p> <p>5</p> <p>The recent appeal decision for De Paul House in Tower Hamlets (Appeal Ref: APP/E5900/W/20/3250665) also required the Planning Inspectorate to grapple with assessing whether the shared-living development would result in overconcentration. The Inspector concluded that the presence of two shared living schemes of 109 units and 139 units within a 3- minute walk would not result in an overconcentration, when considering the nature of the immediate area, in this case with a high predominance of residential accommodation along with some public buildings.</p> <p>Wandsworth Planning Officers have also considered in their assessment for Application 2021/4285 at Access Self Storage, York Road for 193 shared-living rooms does not constitute “over-concentration” with it being located directly adjacent to the consented 239 shared-living units (ref. 2020/4513) currently under construction on the opposite side of the road to the application site at nos. 41-47 Chatfield Road.</p>

	<p>In the recent GLA Stage I Response for Planning Application 2021/4936, the GLA were of the view that the shared-living development “<i>would complement the range of new build developments being delivered in this area and the surrounding housing stock</i>” when considering the types of development within the site’s immediate vicinity, in support of this.</p> <p>We therefore consider that the requirement to assess shared-living development on a case-by- case basis in line with London Plan Policy H16 is more appropriate and justified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Notwithstanding the criteria in London Plan policy H16 (which is required to be met by criterion D1), C3 seeks to avoid an overconcentration, which is a different requirement.</p> <p>Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services. Further information regarding this criterion is provided at para 17.46.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	176
Title	Paragraph
Number	17.45
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	Paragraph 17.45 requires proposals to demonstrate that shared-living units would be more affordable for people on lower quartile and median incomes than conventional units, including room only options. While shared living meets the needs of intermediate households on median wages who can't afford to buy – it is not 'affordable housing' and should not be required to meet affordability tests (as per private sale housing). Room only options in conventional housing are not of comparative quality (need expands to suitability not just affordability) and also reduce the availability of family housing.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The reference is not an additional affordability test, but part of the justification for applicants to give to the Council when considering the conventional unit argument.
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	177
Title	Paragraph
Number	17.46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Paragraph 17.46 references that shared-living can have a negative impact on community interaction (" <i>residential enclaves shut off from the community at large</i> "). It is unclear what evidence base supports this view and we request that this is clarified. While most developments include spaces available for the local community to use i.e commercial or community floorspace, the potential loss of young people of working age from the borough due to an unmet need of good quality housing options is considered to have a much greater negative impact upon the community.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The plan uses wording to suggest that these 'can potentially' have a negative impact which, bearing in mind the range and quality of co-living schemes and the possible range of people using them, might be a risk with some schemes.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	178
Title	Paragraph
Number	17.47
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<u>Paragraph 17.47</u> relates to the management of shared-living developments. This should be updated to reflect the London Plan. Notably the minimum requirement for tenancies of no less than 3 months in line with Policy H16 of the London Plan, as opposed to 6 months.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The January 2022 guidance was in draft at the time of writing. Agreed that the plan should reflect any updated guidance when this is published.
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	179
Title	Paragraph

Number	17.48
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Paragraph 17.48</u> is no longer required as London Plan guidance will set out clear and detailed guidance as to what the required shared-living management plans will need to cover.</p> <p>Summary</p> <p>We believe that the draft Local Plan policy relating to shared living (LP29) does not accord with the NPPF and would be found unsound during Examination in Public for the reasons outlined above and strongly suggest that the current wording is amended to bring it into line with London Plan H16</p> <p>We trust our comments will be taken on board in progressing the draft Local Plan 2030 and we look forward to engaging further with you in the future.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The January 2022 guidance was in draft at the time of writing. Agreed that the plan should reflect any updated guidance when this is published.
Proposed Change	No change considered necessary.
Consultee Full Name	Greystar Europe Holdings Ltd and Big Yellow Self Storage
Consultee Organisation Details	
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	180
Title	RIV5 York Road Business Centre, Yelverton Road, SW11

Number	Statement 60
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Site Allocation RIV5</p> <p>As per our previous representations to the Regulation 18 consultation, we support the retention of the Site for mixed-use development incorporating replacement 'economic floorspace' and residential use under Site Allocation RIV5. We note that economic floorspace is defined as uses comprising office, research and development, light and general industry, storage and logistics/distribution and appropriate sui generis uses. Given the extant consent secured planning permission in April 2019 for retail use as part of a mix of uses, we encourage the council to also include complementary and small-scale retail uses to the allocation to create a genuinely mixed- use development which is a key planning policy objective for the Focal Point Area in which the Site is located within.</p> <p>We agree with part 11.46 of the allocation and Appendix 2 of the Local Plan, identifying the Site as within the 'tall buildings zone' (TB-B1-03) given the extant consent secured planning permission in April 2019 for a part 4-20 storey tower development on site (ref: 2018/3776). In addition to the Site's wider context which includes the Winstanley Estate regeneration ranging from 3 to 31 storeys (ref: 2019/0024) and 100-110 York Road which was granted permission for the erection of a 25-storey building (ref: 2017/0745).</p> <p>However, we note that paragraph 11.46 sets out that the "<i>maximum appropriate height range for the zone is 7 to 20 storeys</i>" and Appendix 2 identifies a height range of 7-20 storeys or 21-60m. This range should be updated to "<i>7 to 24 storeys</i>" to reflect the current planning application pending decision on site (Ref: 2021/4936), which demonstrates that a development of this scale is appropriate in this location. This position was reached through an iterative design process and extensive pre-application consultation with Officers as endorsed by the Wandsworth Design Review Panel (DRP) and supported by the Greater London Authority (GLA) at Stage I The application has also received 18 objections and 4 comments in support, indicating that this quantum and scale of development is generally expected and accepted in the area.</p> <p>Summary</p> <p>We trust our comments will be taken on board in progressing the draft Local Plan 2030 and we look forward to engaging further with you in the future.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. As part of the redrafting between the Pre-Publication and Publication versions of the Local Plan, amendments were made to a number of the site allocation descriptions within the Area Strategy for Wandsworth's Riverside chapter (RIV1, RIV2, RIV3, RIV4, RIV5, RIV6, RIV7, RIV8, RIV9, RIV10) and the Site Allocations Outside the Spatial Areas chapter (OUT5). The amendments sought to simplify the language used within the allocation by removing reference to 'mixed-use development' in favour of 'development'. These amendments inadvertently created inconsistencies in the wording of the allocations against those elsewhere in the Local Plan and, as set out in the representation, have resulted in ambiguity around acceptable uses on these sites. These changes should be reversed to re-introduce the description of 'mixed-use' development as elsewhere in the Local Plan.</p> <p>To ensure alignment with the extant consent, it is agreed that reference to small-scale retail uses should be included in RIV5.</p> <p>Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p>

Proposed Change	<p>Amend paragraph 11.20 in RIV1 as follows: "Mixed-use Development development in line with the Focal Points of Activity policy, including residential use, with active frontages including small-scale retail, restaurants and bars, and new public space leading to the Thames riverside."</p> <p>Amend paragraph 11.27 in RIV2 as follows: "Mixed-use Development; to including residential use and new public open space, with replacement economic uses. New route connecting York Road to Bridges Wharf."</p> <p>Amend paragraph 11.33 in RIV3 as follows: "Mixed-use Development; with economic uses on the ground floor and residential to upper floors. The uses at ground floor should seek to build upon the active frontages in the locality. Entrances to ground and upper floors should be directly from the street."</p> <p>Amend paragraph 11.38 in RIV4 as follows: "Mixed-use Development; incorporating replacement economic floorspace, including affordable creative workspace, and residential with new public space."</p> <p>Amend paragraph 11.43 in RIV5 as follows: "Mixed-use Development incorporating replacement economic floorspace, <i>small-scale retail uses</i>, and residential use."</p> <p>Amend paragraph 11.48 in RIV6 as follows: "Mixed-use Development; including residential and replacement economic floorspace."</p> <p>Amend paragraph 11.52 in RIV7 as follows: "Mixed-use Development incorporating replacement economic floorspace and residential use alongside improvements to the amenity and appearance of the adjacent open space. Economic floorspace is appropriate at ground floor level on the Lombard Road frontage, whilst residential use at ground floor level may be appropriate on the Gwynne Road and Harroway Road frontages."</p> <p>Amend paragraph 11.56 in RIV8 as follows: "Mixed-use Development incorporating replacement economic floorspace and residential use. Buildings fronting Lombard Road and Gwynne Road should define the street frontages with active uses at ground floor level. There is potential for new public realm on the Lombard Road frontage, especially at the junction with Gwynne Road."</p> <p>Amend paragraph 11.62 in RIV9 as follows: "Mixed-use Development including residential. New buildings should define all street frontages with active uses at ground floor level."</p> <p>Amend paragraph 11.66 in RIV10 as follows: "Mixed-use Residential development <i>incorporating residential</i> and commercial uses, <i>that including</i> opportunities for affordable creative workspace."</p> <p>Amend paragraph 13.28 in OUT5 as follows, which incorporates proposed changes made in response to representations submitted by Transport for London (#588): "Mixed-use Development; including residential use with the re-provision <i>of parking</i> and expansion of healthcare facilities <i>and parking</i>."</p>
Consultee Full Name	Sharon Griffin
Consultee Organisation Details	
Agent Full Name	Siofra Boyd
Agent Organisation Details	Associate Director Rolf Judd Planning
Comment ID	181
Title	Paragraph
Number	18.50
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p data-bbox="383 300 815 323">Representation on behalf of Sharon Griffin</p> <p data-bbox="383 368 2107 416">We write on behalf of our client, Sharon Griffin to make representations on the London Borough of Wandsworth's Local Plan (Regulation 19 version) which is out for public consultation. Ms. Griffin and her family are the freehold owners of Nos. 187, 189, 191 and 195 Lavender Hill, SW11 5TB (hereafter referred to as 'the Site').</p> <p data-bbox="383 464 2085 512">As required at this stage of the plan-making process and in accordance with national guidance, this representation shall focus on the soundness of the plan and principally relates to following draft policies and site allocation:</p> <ul data-bbox="383 555 1301 675" style="list-style-type: none"> <li data-bbox="383 555 1301 611">• Draft Economic Use Protection Area (EUPA) of 124 Latchmere Road and 187-207 Lavender Hill <li data-bbox="383 624 936 647">• Draft Policy LP33 (Promoting and Protecting Offices) <li data-bbox="383 651 1032 675">• Draft Policy LP35 (Mixed-Use Development on Economic Land) <p data-bbox="383 719 510 743">Background</p> <p data-bbox="383 791 2096 863">Nos. 187, 189, 191 and 195 Lavender Hill ('the Site') have been identified as part of the 124 Latchmere Road and 187-207 Lavender Hill Economic Use Protection Area (EUPA) within the draft Local Plan. The properties were originally constructed as single-family dwelling houses and are currently predominately residential in nature with commercial, healthcare and educational uses on the lower and upper ground floors.</p> <p data-bbox="383 911 2119 1062">The lower ground floor of No. 187 is in Class F1(a) educational use as an exam preparation centre whilst the lower ground floor of No. 189 is currently vacant having previously been occupied by an adoption agency (Class E(e) use). The upper ground floors of Nos. 187 and 189 are in use as an osteopathy clinic, a Class E(e) healthcare use. The lower ground floor of No. 191 is currently utilised as storage for a commercial operation a Class E(c)(iii) use with the upper ground floor of No. 191 currently vacant having last been in use in 2018 as the offices of a surveying/property management company, a Class E(c)(ii) use. Lastly the lower and upper ground floors of No. 195 are in use as a day nursery a Class E(f) use. The upper floors of each of the properties are in residential use. As such it is evident the upper and lower ground floors of the Site are in a variety of educational, healthcare and commercial uses with the majority of the Site comprising residential uses.</p> <p data-bbox="383 1070 2107 1174">In terms of the other sites included within the 124 Latchmere Road and 187-207 Lavender Hill EUPA designation which are outside my client's ownership; No. 124 Latchmere Road is currently occupied by the London Probation Services akin to a Class F1(g) uses. No. 193 appears to be entirely residential (Class C3) in nature whilst Nos. 201-203 are occupied by Wandsworth's Future First service providing support and guidance to young people leaving the care system (Class E(e) use). No. 205 is in use as an accountant's office (Class E(c)(ii)) whilst No. 207 (extending to 217 Lavender Hill) is occupied by an estate agent (Class E(c)(ii) use).</p> <p data-bbox="383 1214 2119 1294">This is significant given the Site's proposed designation as an Economic Use Protection Area. As outlined below in such locations the Council seeks to protect industrial and office uses, however, in this instance industrial uses do not currently, nor have they historically, existed on site; while office uses comprise a very small portion of the overall mixture of uses currently within the proposed EUPA.</p> <p data-bbox="383 1334 719 1358">Local Plan Consultation Process</p>

Whilst noting the Council appears to have fulfilled its statutory requirements with regards to consultation on the Local Plan; our Client wishes to express her dissatisfaction at receiving no direct communication from the Council regarding the draft Local Plan consultation. As a landowner with properties directly affected by a draft Local Plan policy designation best practice would have been for the Council to notify her directly.

The general public consultation undertaken, as outlined within Appendix 2 of the Statement of Community Involvement, is insufficient for those with properties explicitly referenced and thus directly affected by the draft Local Plan. Our client is perhaps one of many who were unaware of the 'issues' stage and call for sites undertaken as part of the consultation on the 'Pre-Publication' Local Plan (Regulation 18). We trust the Council will give due consideration to our Client's significant concerns with the policies contained within the draft Local Plan, as outlined below, which would have been expressed at an earlier stage in the plan making process had our Client been made aware that such a consultation was underway.

Economic Use Protection Area (EUPA) (Para. 18.49-18.50)

Economic Use Protection Area (EUPA) is a designation in the emerging Wandsworth Local Plan for sites outside of primary office and industrial locations. The Council intends to protect and retain these economic clusters within any forthcoming redevelopment proposals, and to intensify them where possible through their EUPA designation.

The available information concerning EUPA's is quite limited in the draft Local Plan and lists a number of addresses within the borough to be designated as a EUPA. This includes 214 Latchmere Road and

187-207 Lavender Hill which contains four properties within our Client's ownership. Paragraph 18.49 of the draft Local Plan describes EUPAs as follows (underlined sections of our emphasis):

"Established industrial and office premises provide a substantial amount of floorspace for local businesses and are crucial in supporting the borough's economy, and that of London as a whole. Outside of the primary locations for offices and industry activities – Town Centres and the strategic reservoir of industrial land, respectively – economic uses are grouped into clusters. Such clustering can bring substantial benefits. Given the identified need for economic premises over the Local Plan period, it is essential that the Council protect and retain these economic clusters within any forthcoming redevelopment proposal, and to intensify them where possible, through their designation as EUPAs".

Turning first to the main reason paragraph 18.49 provides for including a site within a EUPA; that it contains an established industrial or office premises. In case of Nos. 187, 189, 191 and 195 Lavender Hill these properties do not nor have they ever contained an industrial uses. Whilst offices uses do exist on Site these comprise only a very small element an overall predominately residential use. These properties were originally constructed as single-family dwelling houses and over time came to be occupied by a mixture of commercial, educational and healthcare uses on the upper and lower ground floor levels, with residential uses continuing to occupy the upper levels. Paragraph 18.49 states that established industrial and office premises provide "a substantial amount of floorspace for local businesses", in this case no floorspace is currently, nor has it ever, been provided for an industrial use whilst the quantum of office floorspace provided is de minimis. The potential for the Site to achieve the strategic objectives of the EUPA is thus negligible.

The second reason outlined within paragraph 18.49 for including a site within a EUPA designation is that economic uses are grouped into clusters. Setting aside the negligible economic uses currently present at site, the overall designation of 124 Latchmere Road and 187-207 Lavender Hill within a EUPA appears piecemeal, lacking any sound strategic or cohesive rationale. Aside from the Battersea Arts Centre immediately to the north, the predominate uses within the immediate vicinity are residential and in the case of Lavender Hill itself predominately Class E uses on the ground floor with residential uses above. The Site cannot be seen as an 'economic cluster' one of the key criteria for a sites designation as a EUPA, but rather four buildings designed as single family dwelling houses with a mixture of commercial, healthcare and educational uses on the lower ground floor and residential accommodation on the upper levels.

124 Latchmere Road and 187-207 Lavender Hill are in no way distinctive in terms of their use from any other properties along Lavender Hill or the surrounding area; which it should be noted have not been designated as EUPA. As such we consider their inclusion within a EUPA to be unjustified and unsound as it is not based upon an appropriate strategy or proportionate evidence and thus does not satisfy Paragraph 35 of the NPPF.

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The designation of this site as an 'Economic Use Protection Area' is not a new designation proposed as part of this Local Plan; instead it carries forward the 'Employment Protection Area' designation which exists under the adopted Local Plan. The designation was renamed within the draft Local Plan as 'employment uses' are actually more widely defined within the Local Plan, whereas the adopted and proposed policies in practice refer only to 'economic uses' (office and industrial). For clarity, the policy only applies in the instance of existing office and industrial uses, and other uses within this designation, such as the estate agent, pilates studio and educational facility are not subject to the same requirements (i.e. they do not de jure become 'economic land'). Similarly, although the designation refers to both industrial and office uses, it does not necessitate that all EUPA locations have (or should incorporate as part of redevelopment) both; many only include one or the other. The importance of the EUPAs, many of which are of a similarly small size, is that they cumulatively form a significant proportion of the borough's economic land - and their protection in the Local Plan (adopted and draft) is based on an identified need (in accordance with the requirements of the NPPF).</p> <p>The designation comprised of '124 Latchmere Road and 187-207 Lavender Hill' reflected the legal use of a number of these units as offices, including the ground floor of 187-189 and 191 Lavender Hill, and the London Probation Service at 124 Latchmere Road. It is agreed, however, that the EUPA designation is not now appropriate given the limited amount of floorspace that remains in this legal (or actual) use. As such, this site should be removed as an Economic Use Protection Area from paragraph 18.50 and all applicable maps.</p>
Proposed Change	<p>Amend paragraph 18.50 to remove the designation:</p> <p>"124 Latchmere Road and 187-207 Lavender Hill"</p> <p>Amend Map 18.1 Economic Land accordingly.</p> <p>See Appendix 1 for visualisation of mapping changes.</p>

Consultee Full Name	Sharon Griffin
Consultee Organisation Details	
Agent Full Name	Siofra Boyd
Agent Organisation Details	Associate Director Rolfe Judd Planning
Comment ID	182
Title	LP35 Mixed-Use Development on Economic Land
Number	Policy 46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP35 (Mixed-Use Development on Economic Land)</p> <p>As outlined within Policy LP35 (Mixed-Use Development on Economic Land), proposals for mixed-use development, including residential, will be supported where it meets the following criteria:</p> <ol style="list-style-type: none"> 1 Economic Use Protection Areas (EUPAs): Proposals which would result in the existing quantity of office and industrial floorspace both being fully replaced will be supported. Increased provision through the intensification of such uses is supported, as is the redevelopment of office floorspace to serve industrial uses, where it would not give rise to any material harm to the character of the area, the operation of neighbouring uses or the amenity of neighbouring residents. If it can be clearly demonstrated that there is no demand for the existing industrial use (where applicable) through the submission of evidence that a full and proper marketing exercise of the site has been undertaken for a period of at least 18 months in line with the requirements of Appendix 1 of this Plan, then preference will be given to the provision of office space. <p>Whilst the Site contains commercial, educational and healthcare uses on the lower ground floors it is by no means considered 'economic land'. The predominate use as the Site is residential in keeping with the established character of the surrounding area. Despite this established land use, the Sites' inclusion within the EUPA as proposed by the draft Local Plan would automatically require it to be considered as economic land and be determined in accordance with Policy LP35. Such an approach is unjustified as it fails to take into account reasonable alternatives and it not based on proportionate evidence and is thus contrary to Paragraph 35 Part(b) of the NPPF.</p> <p>The introduction of industrial uses as advocated by draft Policy LP35, which are currently not present within the Site nor within the immediate vicinity, as part of any redevelopment proposal would be out of keeping with the established character of the area. The requirement to provide at least 18 months of marketing evidence would place excessive procedural burdens on future occupiers and increase the potential for planning blight as we emerge from a global pandemic. The introduction of restrictions on existing Class E uses is inconsistent with national policy and restricts the delivery of sustainable development, contrary to Paragraph 35 Part(d) of the NPPPF.</p> <p>Conclusion</p>

	<p>In summation, we trust the above representations from Sharon Griffin will assist with your consideration of the emerging planning policy review. Ms. Griffin has significant concerns at the designation of Nos. 187, 189, 191 and 195 Lavender Hill (the Site) within the 124 Latchmere Road and 187-207 Lavender Hill Economic Use Protection Area (EUPA). The Site does not contain any industrial use whilst office uses comprise a small proportion of the overall, predominately residential use of the Site. As such the Site cannot be considered 'economic land'.</p> <p>The designation of 124 Latchmere Road and 187-207 Lavender Hill as EUPA appears to lack any clear rationale or strategic vision. These properties contain no industrial uses and any commercial uses present are similar to those in the wider area and in no way distinguishable as an 'economic cluster' or worthy of particular protection.</p> <p>The consequence of having the Site designated as EUPA would place unnecessary and costly administrative and procedural burdens on our Client and future occupiers. Such an approach is at odds with the 2020 amendments to the Use Classes Order which lead to the introduction of Class E. The intention of this amendment was to increase flexibility, to bring vacant premises back into use and to improve the vitality and vibrancy of our towns and cities, something of the utmost importance in the wake of the global Covid-19 pandemic.</p> <p>For these reasons we feel the designation of the Site as a EUPA, and resultant application of draft Policies LP33 and LP35 when determining any future planning submission, would be unjustified and inconsistent with national policy and thus unsound contrary to Paragraph 35 of the National Planning Policy Framework.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Please see the response to comment #181.
Proposed Change	Please see the response to comment #181.
Consultee Full Name	Sharon Griffin
Consultee Organisation Details	
Agent Full Name	Siofra Boyd
Agent Organisation Details	Associate Director Rolfe Judd Planning
Comment ID	183
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP33 (Promoting and Protecting Offices)</p> <p>According to Policy LP33 (Promoting and Protecting Offices), existing office floorspace located within Economic Use Protection Areas (EUPAs) will be protected. Redevelopment proposals in such locations will only be supported if:</p> <ol style="list-style-type: none"> 1 They would result in no net loss of office floorspace and the criteria of the relevant designation and/or Site Allocation has been met (Policies LP35 - Mixed Use Development on Economic Land); 2 or within the BDTQ, existing office floorspace is being redeveloped for industrial uses, in accordance with LP34.A; or 3 It has been clearly demonstrated that there is no demand for the use of the premises as offices through the submission of evidence that a full and proper marketing exercise of the site for a period of at least 18 months has been undertaken in line with the requirements set out at Appendix 1 (Marketing Evidence) of the Plan. <p>As outlined within the preceding section we do not consider the Site's inclusion within a EUPA is warranted given it does not contain any industrial uses and has only minimal office uses and thus can by no means be considered an 'economic cluster'. Draft Policy LP33 highlights the significant restrictions which would be in place for properties located within a EUPA.</p> <p>In terms of satisfying the first criterion of draft Local Plan Policy LP33, no net loss of office floorspace would be permitted unless it were being redeveloped for industrial uses. As outlined within the preceding section the surrounding context is primarily residential in nature, albeit with commercial uses at lower levels on main arterial routes such as Lavender Hill. An industrial use in this location would be inappropriate and not in keeping with the established character of the area.</p> <p>In terms of the second criterion, the submission of marketing evidence requires an active and robust campaign to justify why the existing use is not needed, which would have to:</p> <ul style="list-style-type: none"> • be ongoing for a minimum period of 18 months (24 months for public houses); • be through a commercial agent; • be marketed on property databases, search engines and other relevant websites which focus on the sale or letting of commercial premises, that are free to view and easily accessible by prospective purchasers / tenants; and • priced commensurate with the existing quality and location of the premises. <p>This excessively onerous and costly process would occur if any of the small quantum of office uses within the proposed EUPA were to change their use. Since the global Covid 19 pandemic it is more important than ever to have the flexibility to change uses to prevent economic activity from being stymied by unnecessary restrictions; to ensure vacant premises are brought back into use in a timely manner; and to ensure the vitality and viability of our cities. This is at the heart of the Government's recent amendment to the Use Class Order in 2020 and introduction of Class E designed to provide greater flexibility for commercial, business and services uses to change to other uses within the same use class. The requirement to submit 18 months of marketing information for changes of use from offices within a EUPA is entirely at odds with these principles and is inconsistent with national policy, contrary to Paragraph 35 Part (d) of the NPPF.</p> <p>In terms of enforcement of this draft policy it is also unclear whether other uses within Class E would be affected by this change or if they would be treated separately to Class E(g). Since changes of use between Class E uses do not require planning permission, this may complicate things further as it would be difficult to determine whether the space is used for Class E(g), as well as any loss in floorspace.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	Please see the response to comment #181
Proposed Change	Please see the response to comment #181
Consultee Full Name	Mr Daniel Fleet
Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	
Agent Organisation Details	
Comment ID	184
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>SDS1: Spatial Development Strategy and Policy LP24</u></p> <p>TfL CD notes the amalgamation and redrafting of Policy LP24 and SS1. The addition of the wording in criterion A3 which supports the intensification of small sites within areas of higher accessibility is supported. However, it is considered that the new policy does not provide as much clarity as the previous policies, in particular the policy no longer specifically prioritises the redevelopment of brownfield land, vacant and underused buildings which is where development should be supported in line with the London Plan and NPPF, particularly where these are in areas of good access.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy SDS1 refers directly to Policy LP7, where various types of brownfield land development are discussed. Repetition at Policy SDS1 is not necessary.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mr

	Daniel Fleet
Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	
Agent Organisation Details	
Comment ID	185
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy PM2: Wandsworth Town Place Based Policy and Site allocation WT16</p> <p>TfL CD note the council's response in the consultation statement to our previous representation which recognises the site is a key gateway into the borough and will require high quality design. However, TfL CD remain concerned about the use of the word 'striking' in the site allocation as that is a relatively ambiguous and subjective concept. Reference to high quality design instead would be more appropriate.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The wording is considered appropriate and will be assessed against this as part of a Design Panel Review when proposals come forward.
Proposed Change	No change considered necessary.

Consultee Full Name	Mr Daniel Fleet
Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	
Agent Organisation Details	
Comment ID	186
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP10: Responding to the Climate Crisis</p> <p>With regard to criterion B1 and B2 TfL CD previously suggested that reference to viability is included in the policy alongside technical feasibility to justify not achieving the 'Outstanding' requirement. It is noted that paragraph 15.9 now acknowledges that in exceptional circumstances that where it can be demonstrated to the Council's satisfaction that an 'Excellent' rating may be considered where an 'Outstanding' rating is not economically viable. TfL CD maintain that this should be included in the policy as well for clarity and to ensure the policy is effective.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Council has declared a climate emergency and aims to be carbon neutral by 2030. The Wandsworth Environment and Sustainability Strategy details how this will be achieved. The Council has set out in the background text that in exceptional circumstances 'Outstanding' standards may not always be viable. This information was based upon the whole plan viability assessment. However, as technology advances it is expected that sustainability measures and practises should become cheaper and more readily available and therefore over the lifetime of the plan more viable. It is therefore considered appropriate to include reference to viability within the background text and not the policy itself.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Daniel Fleet

Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	
Agent Organisation Details	
Comment ID	187
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP23: Affordable Housing</p> <p>As set out in TfL CD's previous representations TfL follows a portfolio approach portfolio approach in line with London Plan Policy H4 which provides the flexibility for more complex sites to come forward with a lower affordable housing provision where that site would be unviable if it had to provide the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. In criterion b3 of the previous iteration of the Local Plan there was acknowledgment of the portfolio approach, however, this appears to have now been removed. Criterion b3 should be reinstated to ensure the Local Plan is consistent with the London Plan Policy H4.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Criterion A of Policy LP23 states that affordable housing will be sought in accordance with the London Plan. There is no need to repeat the London Plan Policy H4 criteria A4 within the Local Plan.</p>
Proposed Change	No change required.
Consultee Full Name	Mr Daniel Fleet
Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	

Agent Organisation Details	
Comment ID	188
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Policy LP38: Affordable and Open Workspace TfL CD welcomes the changes to Policy LP38 criterion a following our Regulation 18 representations.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changes required.
Consultee Full Name	Mr Daniel Fleet
Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	
Agent Organisation Details	
Comment ID	189
Title	Site Allocations Outside the Spatial Areas
Number	13
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Unallocated sites</p> <p>TfL CD have previously promoted a number of sites through the Wandsworth Call for Sites consultations, and the following TfL landholdings remain unallocated within the latest draft Local Plan. It is considered that these sites are suitable, available, and developable and so should be allocated for mixed-use development:</p> <ul style="list-style-type: none"> - 2, 2a, 2b, 2c, and 2d Tooting Bec Road, SW17 8BD - 2,4,6 and 8 Trinity Road, SW17 7RE - Land at East Putney Station <p>TfL CD would like to continue to promote these sites for allocation within the Local Plan, and that they should also be included in the Council's brownfield register.</p> <p>We believe that our sites located along Tooting Bec Road and Trinity Road Station are suitable for site allocation based upon the guidance given in the Site Allocations Methodology Paper and the Local Plan. The Site Allocations Methodology Paper stated that small sites (under 0.25 ha) were excluded unless the site <i>“presents a particular opportunity for intensification. Smaller sites that would particularly benefit from site-specific policy to promote investment, optimise capacity and/or secure the best development outcome were retained.”</i></p> <p>Site allocations on these sites would support progression of these sites including Land at East Putney Station. Development could optimise the capacity of these sites which are situated in sustainable locations directly adjacent to transport nodes (Tooting Bec Road and Trinity Road have a PTAL rating of 6a) and are located within a local centre.</p> <p><u>Concluding Remarks</u></p> <p>We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. With regards the proposed site allocation 2, 2a, 2b, 2c, and 2d Tooting Bec Road, SW17 8BD. The call for sites application submitted on 11 March 2019 for this site identified the site as 0.3 ha which was below the threshold for inclusion as a site allocation. The site is also not within a sustainable growth location as outlined in the site allocation methodology paper.</p> <p>2,4,6 and 8 Trinity Road, SW17 7RE. The call for sites application submitted on 12 March 2019 for this site identified the site as 0.2 ha which was below the threshold for inclusion as a site allocation. The site is also not within a sustainable growth location as outlined in the site allocation methodology paper. It is not considered appropriate to include the site allocation at this time.</p> <p>Land at East Putney Station. The majority of the site is out with the Putney Spatial Area boundary or Town Centre boundary and was therefore not brought forward as a site allocation.</p>

Proposed Change

No change considered necessary

Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	190
Title	OUT3 Springfield Hospital, Burntwood Lane / Glenburnie Road, SW17
Number	Statement 70
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LONDON BOROUGH OF WANDSWORTH: LOCAL PLAN FULL REVIEW (JANUARY 2022) PUBLICATION VERSION LOCAL PLAN – REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGS 2012</p> <p>We write on behalf of our client, South West London and St Georges Mental Health NHS Trust (SWLSTG), in response to the London Borough of Wandsworth's consultation on the proposed Wandsworth Publication Version Draft Local Plan.</p> <p>These representations set out comments on the Pre-publication Draft Local Plan, dated January 2022. Specifically in this letter we comment on the following matters in relation to the Local Plan:</p> <ul style="list-style-type: none"> • Springfield Hospital Draft Allocation; • Designation of Metropolitan Open Land; • Design-led approach; • Social and Community Infrastructure; • Health and Wellbeing; • Delivery of Residential accommodation; • Affordable Housing; • Energy and Sustainability; and • Car Parking.

Background

Before setting out our comments on the above matters, we set out a brief overview of the South West London and St Georges Mental Health NHS Trust (SWLSTG), in particular in relation to Springfield Hospital, Tooting and its Estate Modernisation Programme.

The Trust was established in December 1994 and provides local mental health services to approximately 1.2 million people in South West London and much needed programme for the modernisation of mental health facilities serving south west London.

In 2012 the Secretary of State granted planning permission and listed building consent for the development of Springfield Hospital, which once completed, will provide a new state-of-the-art mental health hospital alongside new homes, a new care home, school and a major new public park.

Following the 'original' permission a number of amendments have been made which have enabled the scheme to be brought forward.

The site benefits from allocation 89 within Wandsworth's Local Plan Site Specific Allocations Document March 2016). In September 2017 the South West London and St George's Mental Health NHS Trust selected its preferred developer, STEP, and works in relation to the new hospital facility and infrastructure began in early 2019. STEP were further officially appointed in December 2019 as Master Developer for the Site. The following phases of the development have or are in the process of being brought forward:

- Phase 1 – 26 dwellings (brought forward by Bellway– completed);
- Phase 2 – Park and Infrastructure (Implemented by STEP);
- Phase 3 – Hospital (Implemented by STEP);
- Phase 4 – Care Home (brought forward by STEP);
- Phase 5a – 227 dwellings (Implemented by Barratt);
- Phase 5b – 71 dwellings (Implemented by Barratt);
- Phase 6a – 72 conversion dwellings (Implemented by City and Country);
- Phase 6b – Reserved Matters and Listed Building consent for 110 units (Reserved Matters and Listed Building

Consent approved and to be brought forward by City and Country);

- Phase 6c – Reserved Matters and Listed Building consent for 80 units (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country);
- Phase 6c – Full Application for the erection of 32 residential units (to be brought forward ;
- Phase 6d – Reserved Matters consent for the conversion of Glenburnie Lodge (Reserved Matters and Listed Building

Consent approved and to be brought forward by City and Country); and

National Planning Policy Context

In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (July 2021).

Paragraph 9 of the 2021 NPPF requires sustainable development objectives to be delivered through the preparation and implementation of plans. Paragraph 11 of the NPPF requires that during the plan-making process, plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Part b of paragraph 11 requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.

Section 3 of the NPPF deals with plan-making specifically and identifies under Paragraph 16 that the planning system should be genuinely plan-led. Paragraph 16 requires plans to achieve the following:

be prepared with the objective of contributing to the achievement of sustainable development;

- 1 b) be prepared positively, in a way that is aspirational but deliverable;
- 2 c) be shaped by early, proportionate and effective, engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- 3 d) contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals;
- 4 e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- 5 f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

With regard to Strategic Policies, Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment.

Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). This reflects Paragraph 15 of the NPPF which states that a framework for addressing housing needs should be provided through a genuinely plan-led system.

Turning to producing new Local Plans specifically, Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement (Paragraph 32).

The London Plan

Consideration has also been given in the preparation of these representations to the London Plan. The London Plan was adopted in March 2021 and places emphasis on the need to build strong and inclusive communities (Policy GG1), making the best use of land (Policy GG2), creating a healthy city (Policy GG3), delivering the homes Londoners need (Policy GG4) and growing a good economy (Policy GG5).

Wandsworth Publication Version Draft Local Plan - January 2022

The following sections respond to specific policies outlined within the London Borough of Wandsworth (LBW) draft Publication Version Local Plan.

Springfield Hospital Allocation

It is acknowledged that the Site has been reallocated under the Publication Version of the Local Plan following representations made during the Regulation 18 stage of the Local Plan review requesting that the site's allocation is re- instated. Draft allocation OUT 3 (Springfield Hospital, Burntwood Lane/Glenburnie Road, SW17) identifies the Site for new and improved hospital facilities, residential and small scale commercial / retail uses serving the hospital, residential and school facilities. The draft allocation also requires the retention of the Open Space for use as a public park with recreational use and the retention of the locally listed chapel for community facilities.

With regards to the draft development considerations set out within the allocation, it should be noted that the public park will be delivered as part of the extant masterplan. The main areas of the park are due for phased completion: in July 2022 opening to the public in Summer 2023 following a landscape bedding in period (Park Area B) and in June 2023 opening to the public in Spring 2024 following the bedding in period (Park Area A). Park Area C (the last part of the park to be delivered) is linked to the Trust's final residential land sales and relevant approvals, but is likely to reach practical completion during

- 1 2024. Any future development on the Site will continue to integrate the wider Springfield Hospital Masterplan into the wider area and would seek to improve pedestrian and cycle links through the Site. The draft allocation notes that any future development on the Site should improve bus facilities including stops, stand and driver's facilities to mitigate the impact on Burntwood Lane/Trinity Road. Whilst it is agreed that any future development on the Site should seek to mitigate any impacts on the surrounding highway as a result of the development, the requirement to deliver any improved facilities should be in consultation with both the London Borough of Wandsworth and Transport for London. In light of this, the allocation should include a provision of 'if required' with regards to supporting bus facilities.

Furthermore, the draft allocation provides prescriptive requirements for how the layout of the Site is to be brought forward. The draft allocation requires the delivery of small urban blocks to create a distinctive neighbourhood alongside a new public square. A new public Square will be brought forward as part of the outline and is programmed to be completed in August

- 1 2022. In line with Policy GG2 (Making the best use of land) of the London Plan, the most efficient use of the Site is required to be achieved. As such it is not considered appropriate therefore to attribute a development type, such as small urban blocks, within the allocation as any future development brought forward on the Site of an appropriate density for the Site should be tested through a design-led approach.

Finally, the draft allocation identifies that the Site is not located within a tall or mid-rise building zone which means that development proposing five or more storeys would not be acceptable in this location. Whilst it is acknowledged that the London Plan directs Development Plans to define and determine the location of 'tall buildings', which under the draft Local Plan is defined as seven storeys or over 21 meters, there is no requirement for LPAs to identify 'mid-rise' buildings which are defined in the emerging Local Plan as five or more storeys or 15 meters or more from the ground level to the top of the building (whichever is lower).

Paragraph 130e of the NPPF states that 'planning policies and decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks'. In light of the need to optimise the development potential of land, it is considered onerous to restrict the delivery of buildings over five storeys to certain places within the Borough given the national, regional, and local drive to deliver additional housing and the urban and sub urban context of the Borough. Subject to ensuring proposals are design-led which appropriately balance the surrounding local context, including typologies, whilst ensuring the most efficient use of land is achieved the delivery of five or more storey buildings in a number of locations should be considered acceptable across the Borough.

The Springfield Hospital Site is extensive and provides a strategic opportunity for the delivery of further uses including additional residential accommodation in the future. Restricting development to no more than four storeys would impinge on the nature of development which could come forward on the Site and the potential for the Site to maximise its potential in delivering much needed housing in line with national, regional and local policies. It is therefore requested that the LBW review their approach to allocating 'mid-rise' areas in the Borough as it could, on many sites, prohibit their optimisation to ensure they deliver an appropriate amount and mix of development. This would leave it for site specific design approaches and responses to be developed.

Notwithstanding the above, if the approach is not revised it is therefore requested that the Site is designated as within an area appropriate for mid-rise development in light of the Site's context and typology. Paragraph 14.33 of the emerging Local Plan further sets out that opportunities for mid-rise buildings and notes that these should be generally concentrated within five different area types. This includes areas '*alongside large scale open spaces*'. The Springfield Hospital site includes a proposed area of open space equating to approximately 13 hectares and therefore in line with the LPA's criteria for allocating mid-rise areas it is considered that the Springfield Hospital Site should be allocated within a mid-rise area.

In summary, the re-introduction of the allocation is welcomed however the restrictive conditions attached to the allocation is likely to prohibit the optimisation of the Site. In order therefore for Policy GG2 of the London Plan to be achieved these should be removed/revised as set out above.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)

Reason why	
Council Response	<p>Comments noted. With regards the requirements for bus related infrastructure the existing wording is considered appropriate as it relates to the level of impact that is had on Burntwood Lane/ Trinity Road junction which will understood later once transport assessments have been conducted.</p> <p>The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.</p> <p>In accordance with London Plan Policy D3, optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The Urban Design Study balances the demands (potentially competing) between optimising the use of sites to deliver required growth, and ensuring that well-designed places that reflect existing character are delivered.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	191
Title	LP53 Protection and Enhancement of Green and Blue Infrastructure
Number	Policy 64
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Designation of MOL Land</i>

Under the emerging Local Plan, part of the Springfield Hospital site continues to be designated as Metropolitan Open Land (MOL). Draft Policy LP53 (Protection and Enhancement of Green and Blue Infrastructure) of the emerging Local Plan states that areas identified as MOL will be protected, enhanced and made more accessible.

Chapter 13 of the NPPF concerns the protection of Green Belt Land, which is applied equally to MOL. Paragraph 138 identifies that the Green Belt serves the following five purposes:

- 1 a) to check the unrestricted sprawl of large built-up areas;
- 2 b) to prevent neighbouring towns merging into one another;
- 3 c) to assist in safeguarding the countryside from encroachment;
- 4 d) to preserve the setting and special character of historic towns; and
- 5 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Policy G3 (Metropolitan Open Land) of the London Plan states that MOL should be afforded the same protection as Green Belt and requires land designated as MOL to meet one of the following criteria:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

The policy goes onto note that alterations to the boundary of MOL should be undertaken through the Local Plan process. Any alternations to the boundary should only be considered in exceptional circumstances when this is fully evidenced and justified, considering the purposes of including land in the MOL as set out above.

As set out above, the wider Springfield Site benefits from outline permission which approved the comprehensive redevelopment of Springfield Hospital in 2012 and had been lawfully implemented. The wider outline includes the provision of a publically accessible park within the MOL which in line with London Plan Policy G3 and will contribute to the physical structure of London and contain leisure and culture activities.

The emerging Local Plan and its subsequent designation has not been revised to reflect the development which has been permitted on the existing designated MOL (namely parcels P, Q, part of G, X, Y and Z). It is considered that the part of the MOL which falls within parcels P, Q, part of G, X, Y and Z no longer achieves the functions / purposes as set out within the NPPF and the London Plan. For completeness, the most recently approved parcel plan is contained at **Appendix 1** of this letter.

In line with Policy G3 (Metropolitan Open Land) of the London Plan the current Local Plan review process provides an appropriate opportunity to refine the MOL boundary on the Site to account for the development parcels approved. It should be noted that the revision of the MOL Boundary would only be in relation to the development plots and the proposed park and open space would remain subject to such designation. The MOL boundary should therefore be revised, in consultation with key stakeholders of the Site, to reflect the permitted development of parcels P, Q, part of G, X, Y and Z.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comments noted. The Local Plan has not undertaken a Metropolitan Open Land review as part of the Local Plan process.

Proposed Change	No change considered necessary
Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	192
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Design-Led Approach</i> Draft Policy LP1 (The Design-led Approach) requires development proposals to reflect and demonstrate that a design led approach has been adopted to optimise the potential of sites is welcomed by the Trust. The requirement to ensure the most efficient use of land is achieved and Site optimisation accords with the NPPF and Policy GG2 (Making best use of Land) of the London Plan. The Trust recognise the importance of using brownfield sites to deliver much needed residential and social infrastructure and welcomes the requirement for future developments to ensure that they respond, where appropriate to the existing site character.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comments noted.
Proposed Change	No change required.
Consultee Full Name	Mr Andrew

	Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	193
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Tall Buildings</i> As set out above, the Site does not currently lie within an identified tall or mid-rise building zone and as such, under draft Policy LP4 (Tall and Mid-rise Buildings), developments which comprise of more than four storeys would not be permitted on the Site. Whilst it is acknowledged that Policy D9 (Tall Buildings) of the London Plan encourages LPAs to identify locations for tall buildings as part of the Local Plan process, to which this draft Policy attempts to do, the restrictive nature of including mid-rise zones within this Policy prohibits the optimisation of sites in appropriate locations. This could in practice prohibit the ability for mid-rise developments coming forward which could assist in delivering much needed residential accommodation for not only the Borough but also Greater London. It is encouraged that the LBW adopt a design-led approach when determining the acceptability of this quantum of massing (i.e. less than 7 storeys) rather than a blanket approach to all sites which do not fall within the allocation. Notwithstanding this, if the LBW do not adopt such an approach, it is requested that the Springfield Hospital Site benefits from a mid-rise allocation.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.
Proposed Change	No change required

Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	194
Title	LP17 Social and Community Infrastructure
Number	Policy 28
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Social and Community Infrastructure</i></p> <p>Draft Policy LP17 (Social and Community Infrastructure) of the emerging Local Plan states that the Council will work with its key partner organisations and developers to ensure that high-quality, inclusive social and community facilities and services are provided and/or modernised in order to meet the changing needs of the whole community.</p> <p>The Policy outlines that this will be achieved through supporting the dual use of social, education and community facilities, supporting the investment plans and strategies for health facilities and services including mental health care. The acknowledgement of mental health facilities alongside other key health and community facilities is supported and SWLSTG welcomes the support from the Council in delivering investment plans and strategies for the strategic delivery of these services. The support for the provision of education facilities is further supported by our client and the promotion of combined use of social, education and community facilities to accommodate a mix of sporting, social, cultural and recreational uses is also welcomed.</p> <p>Part B of the draft Policy discusses the loss of social, community or cultural infrastructure. The policy states that proposals that involve the loss of such infrastructure will need to demonstrate clearly that there is no longer an identified need for facilities or future demand, or the facilities are being re-provided in a different way and the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local and future need has been fully assessed. Section 6 of Part B states that for existing health or emergency services facilities loss will only be permitted where facilities are declared surplus as part of any strategic restructuring of health or emergency services. This will need to be demonstrated through an overarching estates strategy or similar needs-based assessment. The introduction of the acknowledgment of estate strategies as justification for the loss facilities / services at a particular</p> <p>site is welcomed by the SWLSTG. As set out within the representations made on behalf of SWLSTG during the Local Plan Regulation 18 consultation, acknowledgment should be made that the relocation and consolidation of services may be beyond the LBW boundary and as such needs assessments and estate strategies cannot always be borough specific. The inclusion</p>

	of this cross boundary approach would align with London Plan Policy S2 (Health and Social care facilities) which requires needs assessments to be produced that assess both local and sub regional need to ensure that services which span across boroughs are appropriately considered.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Upon further assessment the Council considers that a modification would be appropriate. To ensure clarity wording will be added to the background text to reflect that the Council understands that relocation and consolidation can not always be borough specific and may be cross borough wide.
Proposed Change	Amend wording in Policy LP17 para 16.23 as follows: In accordance with a <i>service transformation plan or estates</i> strategy relocation <i>or consolidation</i> , provision of public services may be acceptable across the borough boundary
Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	195
Title	LP15 Health and Wellbeing
Number	Policy 26
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Health and Wellbeing</i> As set out previously, the inclusion of draft Policy LP15 (Health and Wellbeing) within the emerging Local Plan, which identifies that the Council will promote and support developments that enable healthy and active lifestyles, is welcomed. SWLSTG supports the Council's policy position which seeks to ensure developments provide access to green infrastructure, sustainable modes of travel, local community facilities, healthy food opportunities, high quality inclusive design and public realm and active design, which meet the needs of all populations

	<p>in order to generate healthy communities. The Council's aspiration to ensure developments promote healthy and active lifestyles accords with both national and regional planning policy and is therefore welcomed. The approved development at Springfield Hospital will bring forward a number of health and wellbeing benefits which accord with the aspirations and requirements of the draft Policy. The NPPF requires planning policies and decisions to aim to achieve healthy, inclusive and safe places and local Plan should plan positively for the provision and use of shared space, community facilities and other services which enhance the sustainability of community and residential environments. The introduction of the Policy further accords with Policy GG2 (Creating a Healthy City) of the London Plan which seeks to improve Londoner's health and reduce health inequalities through the promotion of more active and healthier lifestyle and enable Londoner's to make healthy choices.</p> <p>Part B of the draft Policy requires existing facilities to be retained where there continues to meet resident' needs. As noted above and within representations submitted pursuant to LBW's Local Plan Regulation 18 consultation, it is encouraged that LBW consider need on a basis which is wider than the borough's need. The Trust's wider Estate Modernisation Programme (EMP) seeks to provide two new hospital facilities at Springfield Hospital, Tooting and Tolworth Hospital, Tolworth (RB Kingston upon Thames) and as such any loss of facilities should be considered at both a local and strategic level which includes robust evidence that spans wider than the LBW.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The principle of the representation is agreed and a modification has been proposed taking into account this and other comments on this subject.
Proposed Change	Amend wording in Policy LP17 para 16.23 as follows: In accordance with a <i>service transformation plan or estates</i> strategy relocation <i>or consolidation</i> , provision of public services may be acceptable across the borough boundary
Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	196
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Delivery of Residential Accommodation</i></p> <p>Draft Strategic Policy SDS1 (Spatial Development Strategy 2023-2038) of the emerging Local Plan states that over the plan period of 2023-2038 the Local Plan will provide for a minimum of 20,311 new homes. The provision of 'minimum' in the draft strategic policy is welcomed as it should be reminded that housing targets set are minimum targets and should not be considered maximums. Within the Tooting area, of which the Springfield Hospital Site is located within, the capacity for new homes has been identified as 206 during the plan period. SWLSTG would encourage the LBW to clearly depict within the plan that again, these are minimum indicative requirements and do not set a prescriptive maximum quantum of development to be brought forward in one specific part of the Borough.</p> <p>Part C of the draft Policy sets out how the identified target will be achieved which includes making the best use of land whilst ensuring that development densities are appropriate to the location and size of the site. The encouragement of ensuring the best use of land to deliver much needed residential accommodation is welcomed. It should also be noted that this aligns with both London Plan Policy GG2 and the NPPF which places emphasis on optimisation of sites including brownfield land to deliver residential accommodation. The Springfield Hospital Site presents an opportunity to ensure the most efficient use of this brownfield Site is achieved which would contribute to ensuring that the LBW can achieve their minimum housing targets set out above.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>Springfield Hospital is not within the Tooting figures, but in the rest of the borough figure). The plan is sufficiently clear about the figures being a minimum.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	197
Title	LP23 Affordable Housing
Number	Policy 34

Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Affordable Housing</i></p> <p>The provision of affordable housing across the Borough is supported by SWLSTG. Draft Policy LP23 (Affordable Housing) seeks to maximise the delivery of affordable housing in accordance with the London Plan. Part E of the draft Plan states that '<i>site-specific viability information will only be accepted in exceptional cases, as set out in Policy H5 of the London Plan</i>'. Part F of Policy H5 (Threshold Approach to Applications) states that where an application does not meet the criteria set out in Policy H5 it must follow the Viability Tested Route, which requires detailed supporting viability evidence to be submitted. Policy H5 of the London Plan does not make any reference to or provide clarification on 'exceptional' circumstances where viability testing would be allowed. Whilst SWLSTG supports the introduction of affordable housing, in line with the London Plan, proposals which do not meet policy compliant thresholds should be subject to viability. When assessing the viability of a proposal the wider social infrastructure (e.g. health care, education etc facilities) that are delivered as part of an application should be balanced appropriately with the provision of affordable housing.</p> <p>SWLSTG welcomes the inclusion of key worker accommodation within the social objectives within the draft Local Plan. We would further encourage LBW to recognise within the draft Policy the valuable contribution staff accommodation has on the delivery and operation of healthcare services. Whilst it is acknowledged that the LBW includes key worker accommodation in their social objectives, the policy currently makes no reference to ensure that any such provision of affordable housing is secured for key workers of the NHS.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The wording refers to Criterion F of Policy H5, which sets out the circumstances under which viability information will be required. This is effectively 'exceptional' to meeting the threshold approach.</p>
Proposed Change	No change required

Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	198
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Energy and Sustainability</i> SWLSTG welcomes the LBW commitment to ensuring that the Council achieves its ambition of becoming zero carbon borough by 2050. In order to achieve this, it is noted, under draft Policy LP10 (Responding to the Climate Crisis), development proposals will be required to achieve net zero carbon standards in line with the London Plan with a minimum onsite reduction of 35%. A consistent approach with the London Plan is welcomed. It is noted that the emerging Local Plan further requires new non-residential buildings over 100 sqm to meet BREEAM 'Outstanding' Standards. Whilst the encouragement of high quality sustainable buildings is welcomed, the provision of <i>unless it can be demonstrated that this would not be technical feasible</i> is further welcomed. Developers should seek to deliver the most sustainable development possible whilst balancing other social, environmental, and economic benefits.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Mr Andrew Simpson

Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	199
Title	LP51 Parking, Servicing and Car Free Development
Number	Policy 62
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Car Parking</i></p> <p>The provision of parking in line with the standards set out within the London Plan (draft Policy LP 51 Parking, Servicing and Car Free Development) is welcomed. It is acknowledged that the adjoining text supports the provision of car parking spaces for key workers within new developments. Paragraph 20.36 of the emerging Local Plan states that The Mayor of London is currently producing a list of key workers which Wandsworth will use to provide guidance on the distribution of car parking spaces that are created for key workers including the amendments to Car Parking Zones to allow key works who require use of vehicles greater access to parking permits.</p> <p>The Trust supports the Council's strategic objectives to support the reduction of the use of personal vehicles and the promotion of more sustainable methods of transport however careful consideration will need to be given to ensure that there remains provision to support key workers and their use of vehicles to access work.</p> <p>Closing</p> <p>We trust that these observations are useful at this consultation stage. We wish to maintain an active role in the engagement process moving forward, specifically in relation to the allocation of the Springfield Hospital Site and look forward to receiving an update as LBW proceed through to publishing their new Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	The Council acknowledge that the provision of parking spaces for key workers is an important issue. The wording of paragraph 20.36 is proposed to be amended to clarify the Council's position in support of key worker parking provision. Parking permits for key workers was a temporary measure during the lockdown, and there is no current priority provision for key workers within CPZ.

Proposed Change	<p>Amend wording in paragraph 20.36 as follows:</p> <p>20.36 The Council supports the provision of car parking spaces for key workers within new developments. The Mayor of London is currently producing a list of key workers which Wandsworth will use to provide guidance on the distribution of car parking spaces that are created for key workers. Additionally, Car Parking Zone policies will be amended to allow key workers who require use of a vehicle greater access to parking permits: <i>Within the parameters of Policy LP51 and where parking is to be provided at new housing developments, the Council will support the provision of car parking spaces for key workers. The Mayor of London has produced a list of key workers (contained within the Housing Policy Practice Note, 'Allocating intermediate homes to London's key workers', December 2021), and this will provide a basis for the definition of key workers.</i></p> <p><i>The Council's priority is to help those key workers on lower incomes, with a place of work away from their own home, to travel to work where public transport options are more limited. This support, therefore, is more likely to be appropriate where developments are providing affordable housing in locations with poor PTAL ratings.</i></p>
Consultee Full Name	St George South London Ltd
Consultee Organisation Details	St George South London Ltd
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	201
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Consultation on the Wandsworth Publication Draft Local Plan (Regulation 19) Representations made on behalf of St George South London Ltd The Town and Country Planning (Local Planning) (England) Regulations 2012</p> <p>Quod is instructed by St George South London Ltd ("St George") to submit representations to the Wandsworth Publication Local Plan Regulation 19 (hereby the "Reg 19 Plan"). These representations are submitted within the consultation period that runs from 10th January to 28th February 2022.</p> <p>The representations relate to the Ram Brewery site known as WT2 Ram Brewery/Capital Studios/Former Dexion/Duvall site, Ram Street/Armoury Way, Wandsworth, SW18</p>

St George has acquired Phase 2 and Phase 3 of the Ram Brewery site and is completing the development under the extant planning permissions. Planning permission 2019/5169 approves development of 2-12 storeys in height and a tall building of 36 storeys in height. This is a material consideration which should inform the Regulation 19 Plan.

St George's principal concern is that the implemented development already approved at Phase 2 and 3 appears not to have been used as a material consideration to inform emerging policy. We would therefore like to see both site allocations explicitly refer to the extant consents in both Phase 2 and Phase 3 in respect of the approved number of homes; approved uses; and approved building heights. This will provide a far more appropriate context to the site and for the public to understand.

A summary of our comments is set out in Table 1 below.

Table 1: Summary of Reg 19 Plan Comments

Policy

Reason for non-conformity

Map 3.2 Site

St George supports the allocation of the Ram Brewery site as a development plan allocation.

Allocations

Site allocation WT2 -

St George support the site allocation of a mixed-use development

Ram Brewery/Capital

including residential, replacement economic floorspace; retail, Studios/Former

restaurants, business space, cultural, and entertainment uses with

Dexion/Duvall site,

provision for a riverside walk.

Ram Street/Armoury

Way, Wandsworth,

St George's principal concern is that the implemented development

SW18

already approved at Phase 2 and 3 under planning permission 2019/5169 and 2020/2745, which is a material consideration, is not referenced in the allocation. St George would therefore like to see both site allocations explicitly refer to the extant consents in respect of the approved number of homes; approved uses; and approved building heights. This will provide a far more appropriate context to the site and a greater understanding for the public.

WT2 excludes Phase 1 of the Ram Brewery development. It is therefore not necessary to include obligations relating to Phase 1 within the site allocation "uses" section (e.g There is also a requirement to deliver an ongoing cultural and heritage programme over the site's various development phases, including celebrating the 500 years of brewing onsite through an on-site heritage centre which will be open for a minimum of ten years).

The allocation states that part of WT4 is subject to tall building zone TB- G1-03. Within this zone, the maximum appropriate height range is 7 to 10 storeys.

Part of the site falls within mid-rise building zone MB-G1-08 and MB-G1-

11, and the maximum appropriate height for the zone is 5 storeys. This approach should be revised to reflect the maximum height approved at the site (up to 36 storeys) which has already been granted planning permission and is currently being built out.

LP4 - Tall Buildings

It is considered that the policy is not justified. It is inconsistent with Policy D9 of the London Plan and the maximum zones and heights proposed are not justified by the Council's evidence base Urban Design Study 2021 ('UDS 21'). This document uses an "Analysis of existing buildings and consented masterplan" (by which is means the SPD) as justification for and Appendix 2

the proposed heights, not recent planning permissions that ae currently being built out.

The policy is inflexible as it does not permit heights beyond those prescribed despite planning permission having been granted by the Council for taller buildings. This is unsound.

Policy LP23

-

To ensure consistency with the London Plan and National Policy.

Affordable Housing

Policy LP24 – Housing

To ensure consistency with the London Plan.

Mix

Policy LP30 – Build to

To ensure consistency with LP Policy H11 and National Policy NPPF

paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-

20180913 and to include flexibility as required by the Council's whole plan viability statement.

Conclusion

On behalf of St George, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or these is a change in policy at a local, regional or national level.

**Change(s)
considered
necessary**

**Wishes to attend
Hearing Session**

Reason why

Council Response	<p>Comments noted.</p> <p>Support for the allocation of WT2 is noted. The site allocation provides a framework for the redevelopment of the remaining parts of the Ram Brewery. The ongoing process and the changes that planning applications iteratively bring to the area are difficult to reflect in the Local Plan.</p> <p>These comments in respect of LP4, LP23, LP24 and LP30 both provide an overview and summarise the more detailed responses from the responder to policies within the plan. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	St George South London Ltd
Consultee Organisation Details	St George South London Ltd
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	202
Title	Achieving High Quality Places and Design Excellence
Number	14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 14 Achieving Design Excellence - Policy LP4 Tall Buildings / Appendix 2 Tall Building and Mid-rise Building Maps - OBJECT</p> <p>St George support the identification of part of site allocation W2 as a tall building location at Appendix 2 Map 23.27 Tall Building Zone TB-G1d-02, however are concerned that the height parameters for this zone are 7 to 10 storeys, and that the remainder of the site is identified as Map 23.36 Wandsworth Town and Common Mid-rise Building Zone MB-G1-08 and MB-G1-11) where buildings of no more than 5 storeys are permitted.</p> <p>St George, consider that the height parameters are unjustified by the evidence base to the Local Plan, and fails to acknowledge planning permission 2019/5169 granted by the Council which permits a building up to twelve storeys within Tall Building Zone TB-G1d-02 (where the Reg 19 plan proposes a ten-storey maximum); and permits a building up to 36 stores within Mid-rise Building Zone MB-G1-08 (where the Reg 19 plan proposes a five-storey maximum).</p>

The UDS 21 evidence base considers the site allocation at Page 213 Appendix A Tall Buildings, and states that the justification for the Tall Building Zone TB-G1d-02 is an analysis of the consented masterplan. Page 283 of the UDS 21 A.8.1 TB-G1-03: Wandsworth Town and Riverside which discusses the zone in more detail fails to make reference to planning permission 2019/5169 within the “existing/consented tall building assessment section”. It does not make reference to the approval of a 36 storey tower which is being built out. This is an omission and should be rectified through a re-zoning of the tall building zone and proposed maximum heights.

St George is also concerned with the approach taken for Policy LP4. LP4(C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and LP4(D) states that proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones, and the height of tall buildings will be required to step down towards the edges of the zone (unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area).

This approach is not flexible and would result in an in-principle policy objection to heights at 6 storeys+ and 11 storeys+, despite planning permission existing for taller buildings.

St George suggest that the following wording is introduced into LP4 as a modification: -

Heights to be consistent with the general building heights shown on the Tall Building Zone Maps.

Maps indicate the heights likely to be generally acceptable to the council.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and deliverable when the plan is read as a whole.

Apply flexibility whereby circumstances where the quality of design of a development and its impact on character is such that taller buildings that exceed the general heights in these locations could be shown by applicants to be acceptable.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p> <p>The approach to tall and mid-rise building heights and zones, including the approach of not permitting proposals for tall or mid-rise building outside of these zones, is considered to be consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p>

Proposed Change	No change considered necessary
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Consultee Full Name	St George South London Ltd
Consultee Organisation Details	St George South London Ltd
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	203
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP23 (Affordable Housing) – OBJECT</p> <p>St George support the Council's intention to adopt the London Plan's Fast Track Route for affordable housing. However, the Policy LP23 should define that the Fast Track Route will be available to developments that deliver a minimum of 35% affordable housing in line with Policy H5 of the London Plan. St George believe that flexibility should be introduced to the proposed Council's tenure split of 50% low-cost rest products, 25% First Homes and 25% other intermediate products as this limits flexibility within the intermediate tenure.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The first criterion of LP23 states that Wandsworth will seek to maximise the delivery of affordable housing in accordance with the London Plan, and Criterion (B) mentions the threshold approach and provides a cross-reference to Policy H5 of the London Plan. It is felt that this is sufficiently specific without repeating other policy guidance.</p> <p>First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Changes are made to the supporting text to Policy LP23 to explain this. Uncertainty exists as to the deliverability and viability of First Homes throughout the borough, and no First Homes have been secured in the borough to date. Given this uncertainty, it is agreed that a requirement for First Homes should be removed from the policy, and instead rely upon the reference to First Homes in national policy.</p> <p>Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability. It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. So therefore,</p>

	<p>it is considered that flexibility should be introduced into the wording to seek a balance of intermediate products - which should include First Homes - after the agreement of the low cost rented element, which would reflect those differing circumstances on sites across the borough.</p> <p>Introduction of 'at least' prior to the provision of 50% low cost housing stems from representations made elsewhere.</p>
Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the The updated Planning Practice Guidance, <u>requires</u> 25% of all homes required <u>delivered</u> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <u>should be</u> discounted by at least 30% against the market value, <u>acknowledging the variance of market conditions across the borough</u>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>
Consultee Full Name	St George South London Ltd
Consultee Organisation Details	St George South London Ltd
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	204
Title	LP24 Housing Mix
Number	Policy 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP24 (Housing Mix) – OBJECT</p> <p>Policy LP24 is not in general conformity with LP H10 Housing Site Mix which acknowledges¹ that a higher proportion of one and two bed units is appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. The policy should be revised to state that generally a higher proportion of one and two bed units in locations which are closer to a town centre or station or with higher public transport access and connectivity.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The amendment is unnecessary as it repeats London Plan policies. Appropriate decision making can be made through this and the other policies of the plan (including SDS1, LP1)
Proposed Change	No change considered necessary
Consultee Full Name	St George South London Ltd
Consultee Organisation Details	St George South London Ltd
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	205
Title	Building a Strong Economy
Number	18
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Chapter 18 Building A Strong Economy - Policy LP38 (Affordable and Open Workspace) – OBJECT St George propose that the policy should be revised. It currently proposes that any economic floorspace, regardless of size, should make a contribution to the provision of affordable and/or open workspace. It is considered that Policy LP38 should relate to developments which propose in excess of 1,000sqm (GIA) of economic floorspace.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Policy LP38 provides two options for the provision of affordable and/or managed workspaces, both of which are considered to fulfil the Council's objectives of providing workspace for start-up businesses, SMEs, and other users who through their operation require affordability features (e.g. cultural uses). An identified need for such premises is set out in the borough's Employment Land and Premises Study. For developments of less than 1,000 sqm, the expectation (as per LP38.A.1) is only that developments provide for a range of unit sizes, which is not considered to be onerous, ambiguous or ineffective. Indeed, it represents the position of the adopted Local Plan which has worked well in practice. The amendment as

	suggested within this representation would result in the new Local Plan delivering less affordable workspace than the existing framework, which is not consistent with the strategic ambitions of the Local Plan.
Proposed Change	No change considered necessary.
Consultee Full Name	Peter May
Consultee Organisation Details	Assistant Spatial Planner National Highways
Agent Full Name	
Agent Organisation Details	
Comment ID	207
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Thank you for your email dated 10 January 2022 inviting National Highways to comment on the above Consultation. We recognise that this consultation has now ended but thought you might still find it useful to have National Highways' response for your records. Please accept our apologies for missing the original deadline.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. The closest section of the SRN to Wandsworth is M4 Junction 1, which is approximately 6.5 miles away.</p> <p>National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour. In order to constructively engage in the local plan-making process, we require a robust evidence-base so</p>

that sound advice can be given to local planning authorities, in relation to the appropriateness of proposed development in relation to the SRN. This also extends to include transport solutions that may be required to support potential site allocations. We recognise that, at this stage of the Plan-making process, consultation responses should focus on the draft Local Plan's legal and procedural compliance, including the duty to cooperate, and the 'soundness' of the Plan. National Highways raises no concerns or objections to this consultation. Thank you again for consulting with us and please continue to consult us on other relevant planning applications or consultations via our inbox planningse@nationalhighways.co.uk.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Lucy Lewis
Consultee Organisation Details	Head of Estates, Merton & Wandsworth CCGs clinical commissioning group
Agent Full Name	
Agent Organisation Details	
Comment ID	210
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Area Strategies and Site Allocations The Area Strategies include a Place Performance diagram. It includes an assessment of 'health' which has been informed by strategies, such as the Health and Wellbeing Strategy and by consultation with stakeholders. It is unclear what factors have been considered to assess the health of a place.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Area Strategies include 14 principles that establish characteristics for successful places. By adopting these principles, a qualitative assessment of an area's performance was undertaken. This allowed the strengths and weaknesses to be identified and appropriate responses to be promoted. The results have been informed by an online consultation survey conducted as part of the Urban Design Study and internal consultations with key stakeholders.
Proposed Change	No change considered necessary.
Consultee Full Name	Winstanley and York Road Regeneration LLP
Consultee Organisation Details	
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans

Comment ID	211
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>'PUBLICATION' DRAFT LOCAL PLAN (REGULATION 19) CONSULTATION REPRESENTATIONS IN RESPECT OF THE WINSTANLEY AND YORK ROAD REGENERATION PROJECT</p> <p>These representations are submitted by Montagu Evans on behalf of the Winstanley and York Road Regeneration LLP ("the JV") in respect of the Winstanley and York Road Regeneration Project ("the Estate Regeneration Project"), a joint venture ("the JV") between Taylor Wimpey and the London Borough of Wandsworth.</p> <p>The representations are submitted on behalf of the JV as they wish to maintain their position as a key stakeholder in the comprehensive regeneration of the Winstanley / York Road Regeneration Area.</p> <p>BACKGROUND AND CONTEXT TO THESE REPRESENTATIONS</p> <p>The Winstanley and York Road Regeneration project dates back to 2012. The Council's key strategic aim was to produce a comprehensive masterplan to tackle the range of issues that are contributing to levels of deprivation and lack of opportunities on the Winstanley and York Road Estates.</p> <p>Planning permission (ref. 2017/6864) was granted for the first phase of the regeneration project at Land North of Grant Road on 1 August 2018. This permitted the construction of three buildings ranging from 6 to 20 storeys in height, comprising mixed use development including a total of 139 residential units (including 46 affordable units), a 5,175sqm school and chapel and 219 sqm of flexible commercial uses. These buildings are now completed.</p> <p>On 29 January 2021, a further hybrid planning permission (ref. 2019/0024) was granted for the main phases of the regeneration project which permits up to 2,550 residential units with 35% of these being affordable units together with a new leisure and community centre as well as new park at the centre of the scheme. The approved masterplan will, at a rudimentary level, replace poor quality out-of-date housing stock with new modern energy efficient housing which meets and exceeds typical housing standards. The first of the approved blocks (Block 5) under this permission is to be constructed over coming months with completion targeted for the end of 2023.</p> <p>The JV has worked collaboratively with LBW and other key stakeholders from the beginning of the project to build on the aspirational master planning process carried out by the Council to secure a consent which will deliver major improvements to the physical environment, along with new leisure and communities, and much needed affordable housing. The JV is keen to continue engaging with the Council to facilitate the successful delivery of the masterplan project and create an attractive new neighbourhood for existing and new residents.</p> <p>We have reviewed the relevant sections of the Regulation 19 draft Local Plan and set out our position on the sections below.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Lucinda Robinson
Consultee Organisation Details	Marine Management Organisation
Agent Full Name	
Agent Organisation Details	
Comment ID	212
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>MMO Marine Planning and Marine Licensing response to Wandsworth Local Plan.</p> <p>Thank you for giving us the opportunity to comment on the Local Plan. The comments provided within this letter refer to the document entitled Wandsworth Local Plan.</p> <p>As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.</p> <p>Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The draft plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Marine Licensing</p>

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area.

The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Summary notes

Please see below suggested policies from the South East Inshore Marine Plans that we feel are most relevant to your local plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:

- **SE-INF-1:** Proposals for appropriate marine infrastructure which facilitates land- based activities, or land-based infrastructure which facilitates marine activities (including the diversification or regeneration of sustainable marine industries), should be supported.
- **SE-INF-2:** (1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.

(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.

(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.

(4) Proposals adjacent and opposite existing landing facilities (excluding

safeguarded sites) that may have significant adverse impacts on the landing facilities should demonstrate that they will, in order of preference:

- 1 a) avoid
- 2 b) minimise
- 3 c) mitigate - adverse impacts so they are no longer significant.

- **SE-HER-1:** Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported.

Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference:

- 1 a) avoid
- 2 b) minimise c) mitigate

- any harm to the significance of heritage assets.

If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.

- **SE-SCP-1:** Proposals should ensure they are compatible with their surroundings and should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area.

The location, scale and design of proposals should take account of the character, quality and distinctiveness of the seascape and landscape.

Proposals that may have significant adverse impacts on the seascape and landscape of the area should demonstrate that they will, in order of preference: a) avoid

- 1 b) minimise
- 2 c) mitigate

- adverse impacts so they are no longer significant.

If it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascape and landscape of the area.

Proposals within or relatively close to nationally designated areas should have

regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty.

- **SE-EMP-1:** Proposals that result in a net increase in marine-related employment will be supported, particularly where they meet one or more of the following:

- 1) are aligned with local skills strategies and support the skills available
- 2) create a diversity of opportunities
- 3) create employment in locations identified as the most deprived
- 4) implement new technologies - in, and adjacent to, the south east marine plan area.

- **SE-CC-1:** Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported.

Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:

- 1 a) avoid
- 2 b) minimise c) mitigate

- adverse impacts so they are no longer significant

- 1 d) compensate for significant adverse impacts that cannot be mitigated

- **SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.
- **SE-CC-3:** Proposals in the south east marine plan area, and adjacent marine plan areas, that are likely to have significant adverse impacts on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference:

- a) avoid
- b) minimise
- c) mitigate

- adverse impacts so they are no longer significant

- **SE-AIR-1:** Proposals must assess their direct and indirect impacts upon local air quality and emissions of greenhouse gases.

Proposals that are likely to result in increased air pollution or increased emissions of greenhouse gases must demonstrate that they will, in order of preference:

- 1 a) avoid

2 b) minimise c) mitigate

- air pollution and/or greenhouse gas emissions in line with current national and local air quality objectives and legal requirements.

- **SE-WQ-1:** Proposals that protect, enhance and restore water quality will be supported.

Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:

1 a) avoid
2 b) minimise c) mitigate

- deterioration of water quality in the marine environment

- **SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for tourism and recreation activities, will be supported.

Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference:

1 a) avoid
2 b) minimise c) mitigate

- adverse impacts so they are no longer significant.

- **SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported.

Proposals that may have significant adverse impacts on tourism and recreation activities must demonstrate that they will, in order of preference:

a) avoid
b) minimise
c) mitigate

- adverse impacts so they are no longer significant

SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported.

Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:

1 a) avoid
2 b) minimise c) mitigate

- adverse impacts so they are no longer significant

1 d) compensate for significant adverse impacts that cannot be mitigated.

- **SE-BIO-2:** Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration, will be supported.

Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration, must demonstrate that they will, in order of preference:

1 a) avoid
2 b) minimise
3 c) mitigate - adverse impacts so they are no longer significant

4 d) compensate for significant adverse impacts that cannot be mitigated

- **SE-BIO-3:** Proposals that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, will be supported.

Proposals must take account of the space required for coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference:

- 1 a) avoid
- 2 b) minimise c) mitigate
- 3 d) compensate for - net habitat lo

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Local Plan policies LP58 River Corridors; LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses; and LP60 Moorings and Floating Structures align with SE-INF-1 to support appropriate marine infrastructure which facilitates landbased activities, or land-based infrastructure which facilitates marine activities.

LP40 Safeguarding Wharves (A-B) allow for safeguarded landing facilities to be redeveloped under specific circumstances which conflicts with SE-INF-2 (1). The Council consider that there are means to consolidate land use on safeguarded wharves in opportunity areas which are in accordance with London Plan Policy SI 15 and do not reduce the operational capacity and efficiency. Further considerations for each wharf are set out within the relevant Site Allocations.

LP40 Safeguarded Wharves (C) does set out that sites adjacent to the or in close proximity to safeguarded wharves should be designed to minimise the potential conflicts of use and disturbance, in line with the Agent of Change principle set out within the London Plan Policy D13. This is in keeping with SE-INF-2 (2).

LP60 Moorings and Floating Structures sets out the Council's requirements for development which will impact landing facilities (excluding safeguarded sites). While this does allow for some redevelopment, in conflict with SE-INF-2 (3), it is considered sufficiently restrictive to allow necessary development to come forward without risking the loss of valuable infrastructure along the borough's rivers.

LP60 Moorings and Floating Structures only allows for enhancements of river infrastructure and resists development that would detract from it e.g. development which would create a barrier that would restrict access to the riverside or harm views of the river. LP60 is in keeping with SE-INF-2 (4) which also seeks to prevent adverse impacts to landing facilities and riverside infrastructure.

LP3 Historic Environment sets out requirements that align with SE-HER-1 to conserve and enhance heritage assets.

LP1 The Design-led Approach and LP53 Protection and Enhancement of Green and Blue Infrastructure set out requirements that align with SE-SCP-1 to be designed with respect to the surrounding environment and protect blue and green infrastructure from adverse impacts. The Council set out different requirements and provisions for the replacement of lost green and blue infrastructure which is considered to be more in line with the needs of the borough which is aiming to retain as much of the natural environment as possible.

As set out in the Vision for the Local Plan, the Plan seeks - by 2038 - to provide a range and choice of employment opportunities, including jobs for local people. These are particularly encouraged in the creative and technological industries (point 8), and creating local training and employment opportunities (point 9). This translates into the economic objective to maximise the economic potential of the borough by safeguarding land and buildings for business and industrial use (point 1), and are realised through the policies in particular in Chapter 18 Building a Strong Economy (see, in particular, the new policy LP39 Local Employment and Training Opportunities). These objectives and policies are considered to be consistent with the ambitions of SE-EMP-1.

LP12 Water and Flooding (Sustainable Drainage, Flood Defences and Multifunctional Benefits) sets out requirements that align with SE-CC-1 to support the conservation, restoration or enhancement of habitats that provide flood defence or carbon sequestration. The policy also sets out that all applications need to take account their impact on climate change. LP58 River Corridors, LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses, and LP60 Moorings and Floating Structures all protect against development that would have adverse impacts on flood defence.

LP10 Responding to the Climate Crisis sets out requirements that align with SE-CC-2 to be resilient to the impacts of climate change. This policy does not set out that demonstrating lifetime resilience to climate change as a requirement, however, the requirements set out in A of the policy are considered sufficient and will achieve the same aim as the SE-CC-2. Wandsworth does not have a coastline and therefore cannot meet the final stipulation of this policy.

LP 10 Responding to the Climate Crisis, reinforces the importance of taking a holistic approach to tackling climate change. The management of and adaptation to climate change should be seen as a golden thread which runs throughout Local Plan but in particular LP10 aligns with comment SE-CC-3 by ensuring that any development will avoid, minimise and mitigate against any adverse impacts.

LP14 Air Quality, Pollution and Managing Impacts of Development (Air Quality) sets out requirements that align with SE-AIR-1 to assess the impact of development on local air quality and provide appropriate mitigation measures where possible.

LP57 Urban Greening Factor requires development proposals to take into consideration the vulnerability and importance of local ecological resources - which would include water quality when applying the principles of the Urban Greening Factor. LP 53 Protection and enhancement of green and blue infrastructure also contains requirements to protect and secure enhancement of wetlands, ponds, rivers etc which aligns with SE-WQ-1.

PM9 Wandsworth's Riverside and PM10 Wandle Valley set out requirements that align with SE-ACC-1 to support development which provide access to the riverside in Wandsworth. LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses also sets out a requirement for development to incorporate public riverside walks and cycle-paths in line with SE-ACC-1. LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses also supports development that would not adversely affect river-related infrastructure which would include public access to the riverside.

SDS1 Spatial Development Strategy 2023 - 2038 and LP54 Open Space, Sport and Recreation sets out requirements that align with SE-TR-1 to support the growth of tourism and recreation facilities. LP54 Open Space, Sport and Recreation (B) sets out the requirements for development that would result in the loss of recreation facilities which align generally with SE-TR-1.

LP55 Biodiversity sets out requirements that align with SE-BIO-1 to support the distribution of priority habitats as well as under what exceptional circumstances development on them may be considered appropriate. These requirements are in keeping with the aims of SE-BIO-1 but are worded differently and considered to be more appropriate to the borough.

LP55 Biodiversity sets out requirements that align with SE-BIO-2 to enhance or facilitate native species or habitat adaptation or connectivity, or native species migration as well as under what exceptional circumstances development on them may be considered appropriate. These requirements are in keeping with the aims of SE-BIO-2 but are worded differently and considered to be more appropriate to the borough.

LP58 River Corridors sets out requirements that align with SE-BIO-3 to protect and enhance rivers as a valuable resource for wildlife and biodiversity, including wildlife corridors and green chains. This policy sets out a requirement to maximise biodiversity benefits which aligns with the latter clause of SE-BIO-3

Proposed Change	No change considered necessary
Consultee Full Name	Greystar Europe Holdings Ltd and Big Yellow Self Storage
Consultee Organisation Details	
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	213
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>REPRESENTATIONS ON BEHALF OF GREYSTAR EUROPE HOLDINGS LTD & BIG YELLOW SELF STORAGE.</p> <p>Thank you for providing us with the opportunity to comment on the London Borough of Wandsworth's (LBW) Publication Version (Regulation 19) Local Plan. These representations have been prepared on behalf of our client, Greystar Europe Holdings Ltd and Big Yellow Self Storage who own the York Road Business Centre, Yelverton Road, SW11 (the Site).</p> <p>As you are aware, we previously made representations to the Regulation 18 draft local plan consultation in March 2021. This provides the relevant background on our Client and the Site, which we do not repeat in these representations. It is important to note however, that since our last representations, our client has submitted an application for the proposed erection of a development up to 24 storeys comprising up to 547 shared living units (Sui Generis) and associated amenity space, co-working, cycle hub, café and retail floorspace (approximately 2,023 sqm Class E), landscaping and all associated works at 57-59 Lombard Road which is currently pending decision (Ref: 2021/4936)</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Greystar Europe Holdings Ltd,
Consultee Organisation Details	GreystarEurope Holdings Ltd,
Agent Full Name	Nona Jones
Agent Organisation Details	Planner DP9
Comment ID	214
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>REPRESENTATIONS ON BEHALF OF GREYSTAR EUROPE HOLDINGS LTD, HALYCON DEVELOPMENT PARTNERS, DTZ INVESTORS AND FOLK CO- LIVING</p> <p>Thank you for providing us with the opportunity to comment on the London Borough of Wandsworth's (LBW) Publication Version (Regulation 19) Local Plan. These representations have been prepared on behalf of our client, Greystar Europe Holdings Ltd, Halcyon Development Partners, DTZ Investors and Folk Co-Living.</p> <p>Background</p> <p><u>Greystar Europe Holdings Ltd</u> Greystar is a leading, vertically integrated real estate company that combines expertise in investment management, development and management of rental properties globally with a clear focus on resident experience. The benefit of investment, development and operations being under one roof at Greystar is that they can influence the design of their buildings from inception to create a best in class living environments. They have a wealth of data and insights as a result of being solely focused on rental residential for nearly 30 years. Greystar currently has a portfolio of over 4,000 Built to Rent (BtR) units across London with an array of partners. As you are aware, they have recently submitted an application for up to 547 shared living at 57-59 Lombard Road, Wandsworth, which is currently pending decision (Ref: 2021/4936).</p> <p><u>Halcyon Development Partners</u> Halcyon have a combined 20 years of experience delivering shared living buildings. They have secured planning permission across London for a range of high quality and significant shared living schemes. They have recently delivered 222 shared living studios in Harrow and are currently delivering on-site 554 shared living studios in the London Borough of Wandsworth.</p> <p><u>DTZ Investors</u></p>

	<p>Established the COLIV fund in 2019; the world's first collective investment fund for shared living assets with a target fund size of £1bn. The fund has already acquired and funded 3 shared living assets in Harrow, Earlsfield and Battersea bringing forward almost 800 shared living studios in London.</p> <p><u>Folk Co-Living</u></p> <p>Recently launched London's first bespoke designed and constructed shared living building in Harrow, providing 222 studios alongside a variety of amenity spaces. In Wandsworth, Folk are currently preparing to launch a further 315 shared living studios in Earlsfield in autumn 2022 and 239 shared living studios in Battersea in spring 2023.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Andrew Simpson
Consultee Organisation Details	Planning Director South West London and St George's Mental Health NHS Trust
Agent Full Name	Nadine James
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	215
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	LONDON BOROUGH OF WANDSWORTH: LOCAL PLAN FULL REVIEW (JANUARY 2022) PUBLICATION VERSION LOCAL PLAN – REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGS 2012

We write on behalf of our client, South West London and St Georges Mental Health NHS Trust (SWLSTG), in response to the London Borough of Wandsworth's consultation on the proposed Wandsworth Publication Version Draft Local Plan.

These representations set out comments on the Pre-publication Draft Local Plan, dated January 2022. Specifically in this letter we comment on the following matters in relation to the Local Plan:

- Springfield Hospital Draft Allocation;
- Designation of Metropolitan Open Land;
- Design-led approach;
- Social and Community Infrastructure;
- Health and Wellbeing;
- Delivery of Residential accommodation;
- Affordable Housing;
- Energy and Sustainability; and
- Car Parking.

Background

Before setting out our comments on the above matters, we set out a brief overview of the South West London and St Georges Mental Health NHS Trust (SWLSTG), in particular in relation to Springfield Hospital, Tooting and its Estate Modernisation Programme.

The Trust was established in December 1994 and provides local mental health services to approximately 1.2 million people in South West London and much needed programme for the modernisation of mental health facilities serving south west London.

In 2012 the Secretary of State granted planning permission and listed building consent for the development of Springfield Hospital, which once completed, will provide a new state-of-the-art mental health hospital alongside new homes, a new care home, school and a major new public park.

Following the 'original' permission a number of amendments have been made which have enabled the scheme to be brought forward.

The site benefits from allocation 89 within Wandsworth's Local Plan Site Specific Allocations Document March 2016). In September 2017 the South West London and St George's Mental Health NHS Trust selected its preferred developer, STEP, and works in relation to the new hospital facility and infrastructure began in early 2019. STEP were further officially appointed in December 2019 as Master Developer for the Site. The following phases of the development have or are in the process of being brought forward:

- Phase 1 – 26 dwellings (brought forward by Bellway– completed);
- Phase 2 – Park and Infrastructure (Implemented by STEP);
- Phase 3 – Hospital (Implemented by STEP);
- Phase 4 – Care Home (brought forward by STEP);
- Phase 5a – 227 dwellings (Implemented by Barratt);
- Phase 5b – 71 dwellings (Implemented by Barratt);
- Phase 6a – 72 conversion dwellings (Implemented by City and Country);
- Phase 6b – Reserved Matters and Listed Building consent for 110 units (Reserved Matters and Listed Building

Consent approved and to be brought forward by City and Country);

- Phase 6c – Reserved Matters and Listed Building consent for 80 units (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country);
- Phase 6c – Full Application for the erection of 32 residential units (to be brought forward ;
- Phase 6d – Reserved Matters consent for the conversion of Glenburnie Lodge (Reserved Matters and Listed Building

Consent approved and to be brought forward by City and Country); and

National Planning Policy Context

In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (July 2021).

Paragraph 9 of the 2021 NPPF requires sustainable development objectives to be delivered through the preparation and implementation of plans. Paragraph 11 of the NPPF requires that during the plan-making process, plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Part b of paragraph 11 requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.

Section 3 of the NPPF deals with plan-making specifically and identifies under Paragraph 16 that the planning system should be genuinely plan-led. Paragraph 16 requires plans to achieve the following:

be prepared with the objective of contributing to the achievement of sustainable development;

- 1 b) be prepared positively, in a way that is aspirational but deliverable;
- 2 c) be shaped by early, proportionate and effective, engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- 3 d) contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals;
- 4 e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- 5 f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

With regard to Strategic Policies, Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment.

Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). This reflects Paragraph 15 of the NPPF which states that a framework for addressing housing needs should be provided through a genuinely plan-led system.

Turning to producing new Local Plans specifically, Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement (Paragraph 32).

The London Plan

Consideration has also been given in the preparation of these representations to the London Plan. The London Plan was adopted in March 2021 and places emphasis on the need to build strong and inclusive communities (Policy GG1), making the best use of land (Policy GG2), creating a healthy city (Policy GG3), delivering the homes Londoners need (Policy GG4) and growing a good economy (Policy GG5).

Wandsworth Publication Version Draft Local Plan - January 2022

The following sections respond to specific policies outlined within the London Borough of Wandsworth (LBW) draft Publication Version Local Plan.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The Plan is considered to be sound and in accordance with the NPPF and the London Plan.
Proposed Change	No changes considered necessary.
Consultee Full Name	Mr Daniel Fleet
Consultee Organisation Details	Transport for London Commercial Development planning
Agent Full Name	
Agent Organisation Details	
Comment ID	216
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<u>RE: WANDSWORTH LOCAL PLAN PUBLICATION (REGULATION 19)</u> Thank you for providing the opportunity to comment on Wandsworth Local Plan Publication

	<p>Regulation 19.</p> <p>Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>TfL CD have engaged through the Local Plan preparation process and have submitted the following representations:</p> <ul style="list-style-type: none"> - Wandsworth Local Plan Employment and Industry Review - Wandsworth Local Plan Issues and Options (December 2018) - Wandsworth Call for Sites (March 2019) - Wandsworth Local Plan Pre-Publication Regulation 18 (February 2021) <p>Our representations in respect of the Wandsworth Local Plan are set out below.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary
Consultee Full Name	Access Self Storage
Consultee Organisation Details	
Agent Full Name	ms Alexandra Milne
Agent Organisation Details	DP9 Planning
Comment ID	217
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>RE: WANDSWORTH LOCAL PLAN PUBLICATION VERSION - REGULATION 19 CONSULTATION REPRESENTATIONS ON BEHALF OF PRECIS ADVISORY</p> <p>Thank you for providing us with the opportunity to comment on the London Borough of Wandsworth's (LBW) Publication Version (Regulation 19) Local Plan which is currently out for consultation until 28 February 2022. These representations have been prepared on behalf of our client, Precis Advisory, who own the Access Self Storage facility at 248-250 York Road, SW11 ("the site").</p> <p>Background</p> <p>The site is a rectangular parcel of land that fronts onto Mendip Road to the east, York Road to the south and Chatfield Road to the northeast. It is currently occupied by a two to four storey industrial unit that operates as a commercial storage facility as well as office space. The draft designations pertaining to the site contained within the Regulation 19 Local Plan include:</p> <ul style="list-style-type: none"> • Riverside Area Strategy • Battersea Riverside Character Area • Economic Use Protection Area • Tall Buildings • Archaeological Priority Area • Thames Policy Area • Decentralised Energy Opportunities • Flood Zone 3a <p>After several years of discussions with LBW officers our client submitted an application in November 2020 for <i>"Demolition of the existing buildings and erection of a block ranging from.8 to 13 storeys (with a podium level and double basement) fronting York Road and Mendip Road comprising 193 shared-living rooms (sui generis), 131 residential units, storage space (class B8), and office and cafe (class E), uses; plus landscaping, plant and associated works."</i> (Ref.2020/4285).</p> <p>This application was recommended for approval by LBW's planning officers and heard at LBW's Planning Application Committee on 22 February 2022 and members resolved to refuse permission. The reasons for refusal have not been finalised at the time of writing but are expected to include unacceptable loss of employment space and over-provision of 1-bedroom units.</p> <p>Specific comments on the draft policies are set out below and focus on relevant land use policies and policies relating to tall buildings.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary

Consultee Full Name	mccarthy and stone
Consultee Organisation Details	McCarthy and Stone UK Ltd
Agent Full Name	Mr Ziyad Thomas
Agent Organisation Details	planning issues
Comment ID	218
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>CHURCHILL RETIREMENT LIVING AND McCARTHY STONE RETIREMENT LIFESTYLES RESPONSE TO THE WANDSWORTH LOCAL PLAN 2021-2036 (REGULATION 19) PRE-SUBMISSION CONSULTATION</p> <p>Policy LP23: Affordable Housing COMMENT Affordable Housing requirements in the Wandsworth Local Plan are linked to the corresponding policies in the London Plan – namely Policy H4: Delivering affordable housing. This sets a strategic target of 50% of all new homes in London to be ‘genuinely affordable’ with a 35% affordable housing requirement for residential developments that fulfil the requirements of the threshold approach detailed in Policy H5: Threshold approach to applications. The respondents, as part of a Retirement Housing Consortium, have consistently voiced their concerns about the Mayor of London’s threshold approach and the viability evidence underpinning this. These concerns were presented during the EIP, however despite the Examiners acknowledging our concerns the London Plan Examination in Public: Panel Report (October 2019) concluded that: 222. ‘The threshold requirements for affordable housing have been challenged, on the basis of the higher build costs compared with mainstream housing. This is reflected in the findings of the LPVS, which indicates that viability for sheltered and extra care housing is more difficult in lower value areas. Further the case studies tested for this type of housing in the LPVS do not reflect industry practice. For these reasons, we are not convinced that viability would not hamper delivery. However, in light of the significant need for affordable homes and given that the “viability tested route” is available to assess the impact of viability on affordable housing requirements, it is worth waiting to assess the impact of this new policy approach. However, close monitoring should take place to ensure that the impacts are properly assessed and fed into any review This ‘wait and see’ approach does not accord with the increased emphasis for the viability of planning obligations to be tested, robustly, at the Plan making stage. The London Plan was assessed with regard to the policies in the 2012 version of the NPPF, and other relevant policy under the transitional arrangements detailed in NPPF (2019) paragraph 214 and footnote 69. It was not assessed against the revisions to the NPPF made in 2018, 2019 or 2021. Notwithstanding the respondent’s concerns with The London Plan Viability Study, we note that it concluded that the viability of older persons’ housing was particularly finely balanced in the outer London Boroughs (Value Bands D & E):</p> <p><i>Other residential development types</i></p> <p><i>14.2.11 This group of uses includes specialist provision for the elderly and others needing sheltered or extra care facilities and for care homes. It also includes student accommodation and another relatively new form of provision – Shared Living. Generally, all these types of uses are viable and able to provide affordable housing (when required to do so). However, there are considerable differences in viability between the uses. The policy requirements for student accommodation and Shared Living can be met across the value areas. Sheltered housing is able to provide 50% affordable housing in Value Band C, but not in D or E. Extra care, as was tested for this study, was viable with 35% affordable housing in C but not in D or E. (Emphasis own)</i></p>

The London Plan's approach, particularly in respect of development viability and affordable housing contributions, is not considered to be consistent with that of the NPPF (2021). While the respondents will not reiterate the point made in their submissions to the London Plan, they remain strongly of the view that the viability assessments for older persons' housing typologies in the *London Plan Viability Study* were not fit for purpose and substantially overstated the viability of these forms of development.

The affordable housing targets detailed in the *Policy LP23: Affordable Housing* of the Wandsworth Local Plan Review are informed by the *Wandsworth Reg 19 Local Plan Viability Study* (LPVS) by Porter Planning Economics and Three Dragons. We note that the LPVS has assessed the viability of older persons' housing typologies, which is welcomed.

In reviewing the methodology for assessing specialist older persons' housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although we consider that some of the assumptions used are not representative of the specialist older persons' housing sector. Our concern is that the LPVS has overplayed the viability of older persons' housing.

Notwithstanding this, we note that the LPVS has concluded that older persons' housing cannot meet the 50% affordable requirement detailed in *Policy H4: Delivering affordable housing* across much of the Borough.

7.26 *As in Scenario 2, Policy LP23 at a threshold rate of 50% affordable housing across all residential developments with 10 or more dwellings is applied to the older person homes testing. As tested and shown in Table 7.8 Scenario 4, this change similarly affects the older persons typologies as it does for general residential typologies, with both retirement homes and extra-care homes sites in the lower value area 1, and the retirement homes in the mid value area 2 becoming unviable. But such specialist units in the higher value area 3 would be able to afford the 50% affordable housing rate, and the extra-care units in value area 2 would also be marginally viable, albeit marginally so.*

7.27 *Also tested and shown in Table 7.8 Scenario 5 is the impact of the combined influence of a 14.8% sales price increase and 19% build cost increases over the next five years (as tested in Scenario 1c). The results in Table 7.8 show that there would be a slight improvement on the base case position, and an improved overall viability headroom. But overall, the viability of sites is not notably affected by these potential changes in estimated medium changes to local build costs and sales values to the base case.*

In effect a 50% affordable housing contribution is only feasible in the north of the Borough, within the London Central Activity Zone. Properties in Value Zone 2, largely in the middle and eastern parts of the Borough cannot currently support a 50% affordable housing contribution but may be able to if the forecasted increase in sales values and build costs arises. Value Zone 1, to the west and south of the Borough, cannot support a 50% affordable housing contribution either now or with the changes proposed by forecasting.

RECOMMENDATION

As the Wandsworth Local Plan Review will be determined against the NPPF (2021), with its increased emphasis on robust viability assessments at the plan making stage, it is the Borough's responsibility to ensure its planning obligations regime is sufficiently robust and justified.

It is our view that, considering the critical need for specialist older persons' housing, and the findings of the Local Plan Viability Study, it would be appropriate for *Policy LP23: Affordable Housing* to deviate from the generic, high-level affordable housing requirements detailed in the London Plan. We respectfully request a differential affordable housing requirement, that is commensurate with their viability (i.e. under 50%) for these forms of accommodation, outside the London Central Activity Zone.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	<p>Comment noted.</p> <p>The Whole Plan Viability Assessment states that the approach to assessing plan viability should recognise that it can only provide high level assurance that the policies within the plan are set in a way that is compatible with the likely economic viability. It cannot guarantee that every development in the plan period will be viable, only that the plan policies should be viable for most sites at the current time.</p> <p>All forms of Class C3 housing are subject to the general housing policies of the London Plan and the Local Plan and are required to provide affordable housing.</p> <p>In order to be compliant with the London Plan, and secure 50% of all homes to be affordable, the policy reflects the London Plan ambition. In accord with any development, there is scope to provide affordable housing at different levels, subject to the submission of evidence where required.</p>
Proposed Change	No change required
Consultee Full Name	Will Everson
Consultee Organisation Details	Associate Town Planner NHS Property Services Ltd
Agent Full Name	
Agent Organisation Details	
Comment ID	219
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Local Plan Publication (Regulation 19) Version January 2022</p> <p>Thank you for the opportunity to comment on the above document. These representations are made by NHS Property Services (NHSPS) to the London Borough of Wandsworth (“the Council”) in respect of their Publication Draft Local Plan. They follow on from representations made by NHSPS on the Issues Document, February 2019 and those made in February 2021 on the Wandsworth Pre-Publication Draft Local Plan (Regulation 18). We ask that this response be read in conjunction with those comments previously made.</p> <p>Foreword</p> <p>NHSPS manages, maintains, and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p>

A key part of NHSPS' role relates to the provision of new healthcare facilities with the goal of ensuring that the healthcare needs of communities can be met. NHSPS works with commissioners, care providers and local councils to identify and respond to local healthcare and property needs. As such, it is involved in the acquisition and development of new facilities, and the redevelopment of existing facilities. Furthermore, NHSPS is required to dispose of land and property assets or facilities that have been identified as surplus to NHS requirements by Commissioners. This has resulted in the sale of 441 surplus properties, generated £381 million of sales receipts for the public purse and contributed to land sales supporting 6,607 housing units since April 2013.

Background

NHSPS is the freehold landowner of a number of health facilities in Wandsworth. Discussions have previously taken place in support of the following draft site allocations:

- OUT1 Balham Health Centre, 120 - 124 Bedford Hill, London, SW12
- OUT5 Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London SW11 3AD
- RO3 Queen Mary's Hospital car park, SW15

Our representations review these sites in turn taking account of proposed land use allocations and amendments since the Pre-Publication Draft Local Plan (Regulation 18).

Closing

We trust these representations are informative at this stage of the new Local Plan preparation and will be taken into consideration. Should you require any clarification on the issues raised in these representations, please do not hesitate to contact myself.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Will Everson
Consultee Organisation Details	Associate Town Planner NHS Property Services Ltd

Agent Full Name	
Agent Organisation Details	
Comment ID	220
Title	OUT1 Balham Health Centre, 120 - 124 Bedford Hill, London, SW12
Number	Statement 68
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Site Allocations Outside the Spatial Areas</p> <p><u>OUT1 Balham Health Centre</u></p> <p>Balham Health Centre is allocated for a mixed-use development including residential and expansion of healthcare facilities. The site itself is in the freehold ownership of NHSPS and we have been working to understand development potential in light of health care requirements. NHSPS therefore continue to support the proposed allocation of this site in principle and given the urban context, close to Balham centre, there is potential to intensify the existing land use and provide a high-quality building and much needed residential dwellings. The development of this site will allow for investment in new healthcare buildings and services for the community.</p> <p>NHSPS note those comments made by officers within the Statement of Consultation Regulation 18 document. To guarantee the allocation is sound, by being sufficiently flexible and to ensure there is no risk to the deliverability of healthcare facilities and new housing, suggested amendments are provided below.</p> <p>Nature – <u>Suitable</u> Existing trees and green space must be re provided on site</p> <p>Justification: It may be impractical to re-provide trees and green space on a like for like basis. To allow for the proper planning of the site and to achieve improvements in green infrastructure and biodiversity, trees and green space provision should seek to enhance the existing situation. NHSPS believe such an approach would be consistent with draft policies LP55 and LP56.</p> <p>Site allocation: Mixed use development including residential and expansion <u>improvement</u> of healthcare facilities <u>with enabling residential development, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area.</u></p> <p>Justification: As set out within our previous representations, the NHS requires flexibility within the estate. Should services be re-provided elsewhere, then the site could be developed for residential use only. Any relocation would involve improving services, potentially co- located/integrated with other uses and in a more accessible location in accordance with commissioning requirements.</p>

	<p>NHSPS note officers' comments (1465) stating that 'The site allocation requires the reprovion and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.' NHSPS believe this approach to be inconsistent with part A5 of Policy S2 within the London Plan, which sets out that 'Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to...identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.'</p> <p>If an alternative location is considered more suitable for improved health services, then the site will become surplus and must be considered for other land uses. As explained, this would be subject to commissioning requirements and in coordination with the Council and community. The proposed amendments would ensure this is appropriately facilitated.</p> <p>The replacement of 'expansion' with 'improvement' will ensure the NHS is not committed to providing an increased amount of healthcare floorspace on site. It is important to understand that changing models of care allow for increased service provision but within a smaller a building. The emphasis should be on improving and modernising facilities, not necessarily expanding.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. The wording of site allocation OUT1 is considered sufficiently flexible to allow appropriate sustainable development come forward. The Local Plan should be read as a whole and LP17 Social and Community Infrastructure sets out the guidance for redeveloping an existing healthcare use for residential uses, therefore this does not need to be included in the site allocation itself.
Proposed Change	No change considered necessary.
Consultee Full Name	Will Everson
Consultee Organisation Details	Associate Town Planner NHS Property Services Ltd
Agent Full Name	
Agent Organisation Details	
Comment ID	221
Title	OUT5 Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London SW11 3AD
Number	Statement 72
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation

OUT5 Bridge Lane Medical Group Practice

Bridge Lane Medical Group Practice is allocated for a mixed-use development including residential with reprovision and expansion of healthcare facilities and parking.

As with Balham Health Centre, the site is in the freehold ownership of NHSPS, and we have been considering development options in light of health care requirements. NHSPS therefore support the proposed allocation of this site. Options have included reprovision of the existing health facility and enabling residential and/or a wholly residential scheme, subject to healthcare commissioning requirements. Any value generating residential development on this site will allow for reinvestment in healthcare services, consistent with our earlier comments on Balham Health Centre.

NHSPS note those comments made by officers within the Statement of Consultation Regulation 18 document. To guarantee the allocation is sound, by being sufficiently flexible to ensure there is no risk to the deliverability of healthcare facilities and new housing, suggested amendments are provided below.

Nature – Suitable Existing trees and green space must be re provided on site

Justification: As with Balham Health Centre, it may be impractical to re-provide trees and green space on a like for like basis. To allow for the proper planning of the site and to achieve improvements in green infrastructure and biodiversity, trees and green space provision should seek to enhance the existing situation. NHSPS believe such an approach would be consistent with draft policies LP55 and LP56.

Site allocation: Mixed use development including residential and expansion of healthcare facilities with enabling residential development, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area.

NHSPS note officers' comments (1483) stating that 'The site allocation requires the reprovision and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.' NHSPS would point out that the site is not close to Balham town centre and believe this to be an error.

As with Balham Health Centre however, the proposed amendments will ensure the allocation is consistent with part A5 of Policy S2 within the London Plan, which sets out that 'Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to...identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.'

The replacement of 'expansion' with 'improvement' will ensure the NHS is not committed to providing an increased amount of healthcare floorspace on site. It is important to understand that changing models of care allow for increased service provision but within a smaller a building. The emphasis should be on improving and modernising facilities, not necessarily expanding.

Similarly, we would also point out again that parking provision should be reflective of any future development and current policy requirements. The allocation should not seek to expand provision.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response	Comments noted. The wording of site allocation OUT5 is considered sufficiently flexible to allow appropriate sustainable development come forward. The Local Plan should be read as a whole and LP17 Social and Community Infrastructure sets out the guidance for redeveloping an existing healthcare use for residential uses, therefore this does not need to be included in the site allocation itself.
Proposed Change	No change considered necessary

Consultee Full Name	Will Everson
Consultee Organisation Details	Associate Town Planner NHS Property Services Ltd
Agent Full Name	
Agent Organisation Details	
Comment ID	222
Title	LP17 Social and Community Infrastructure
Number	Policy 28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Policy LP17 Social and Community Infrastructure</u></p> <p>NHSPS continue to support the Council's intention to work with its key partner organisations and developers to ensure that high quality social and community facilities and services are provided and/or modernised in order to meet the changing needs.</p> <p>It is welcomed that the Council recognise and support investment plans and strategies for the provision of health facilities and services including for mental health care, GP and local hospital services.</p> <p>NHSPS support amendments to LP17, which now includes part B6 stating that 'The loss of social, community or cultural infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly...that for existing health or emergency service facilities, loss will only be permitted where facilities are declared surplus to need as part of any strategic restructuring of health or emergency services demonstrated through an overarching estates strategy or similar needs-based assessment.'</p> <p>NHSPS do however continue to seek clarity that if part B6 is successfully applied to the disposal or redevelopment of an existing NHS asset, then Parts B 1 -5 will not apply. This clarification would ensure LP17 is consistent with London Plan Policy S1 which allows for the independent loss of social infrastructure where 'the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.' See Policy S1 Part 2 and Part G.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is considered that the current wording of policy LP17B is clear that if part B6 is successfully applied then part B1-5 do not apply.
Proposed Change	No change required.
Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	224
Title	LP54 Open Space, Sport and Recreation
Number	Policy 65
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Sport England has reviewed Wandsworth's Regulation 19 Local Plan and would like to reiterate the points made previously (below) as it is considered that the majority of those still stand. In particular, it is of concern that policy LP54 (previously LP56) is not compliant with the NPPF, as any 'replacement' of lost playing field with access to previously private playing field is still considered a net loss of playing field. Sport England objects to this policy as it is not compliant with national policy.</p> <p>Sport England is also concerned that the policy does not mention the need to take a robust and up to date assessment of sport provision into account when determining whether facilities are surplus to requirements (again, as per the NPPF). Ideally the policy should refer to the relevant documents which I understand are now complete and due to be adopted this year – the Wandsworth Playing Pitch Strategy and Built/Indoor facilities strategy. This will allow both potential applicants and DM officers to easily refer to them when making or assessing planning applications.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>LP54 Open Space, Sport and Recreation is considered sound and in line with the NPPF however to clarify this more accurately minor amendments could be made part A(1).</p> <p>The Local Plan is supported by a robust evidence base and the policy could be updated to include specific reference to these relevant pieces of work. The inclusion of reference to evidence base being up to date is considered unnecessary for inclusion at this time.</p>

	An updated Playing Pitch Strategy is scheduled to go to the September Committee for approval.
Proposed Change	<p>Amend wording in policy LP54 Open Space, Sport and Recreation as follows:</p> <p>A. Any proposal that would result in a loss of sports pitches, playing fields, or land last used for outdoor sport, or which would prejudice the land's future use for sport in terms of quality or quantity of facilities, will not be permitted unless it can be clearly demonstrated that:</p> <p>1. it would provide additional <i>replacement</i> open space and/or secure public access to private facilities in areas identified as deficient in open space, play space or sport and recreation facilities; and <i>of equivalent or better provision in terms of quantity and quality in a suitable location;</i></p> <p>2. it would meet the priorities identified in the Playing Pitch Strategy.</p> <p>...</p> <p>C. Proposals for new, or improvements to existing, sports facilities and indoor recreation and leisure developments should:</p> <p>1. be developed in accordance with and meet the needs of the Playing Pitch Strategy <i>or the Built Facilities Study, as appropriate;</i></p>
Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	225
Title	OUT3 Springfield Hospital, Burntwood Lane / Glenburnie Road, SW17
Number	Statement 70
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Finally I note that Springfield hospital site is now included in the Site Allocations. I note that the site allocation makes reference to the proposed public park which will provide activities for all age groups. Sport England would request that this site allocation also makes reference to sport being provided on this site.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Including specific reference to sport's provision in the site allocation would not be considered appropriate however the site allocation does not suggest that informal sport could not take place in the open space.
Proposed Change	No change considered necessary
Consultee Full Name	Mr David Wilson
Consultee Organisation Details	Senior Town Planner Thames Water
Agent Full Name	
Agent Organisation Details	
Comment ID	226
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Site Allocations</p> <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand: • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site The time to deliver upgrades shouldn't be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn't outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity We recommend developers attach the information we</p>

	provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section. Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. LP2 and LP22 set out detailed requirements for utility infrastructure required by a development. The Council will engage with Thames Water regarding water and waste infrastructure at the pre-application and the application stage as necessary. The site allocation information that has been provided is much appreciated and will be passed on to development management colleagues.
Proposed Change	No change considered necessary.

Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	227
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	I would also strongly suggest that the Bank of England sports club site is included in the Site Allocations to be protected for sport, as per my previous comments.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Bank of England Site was considered post Regulation 18 Local Plan consultation as outlined in the Site Allocation Methodology Paper. The site is not within any of the designations that were considered at the initial phases of the sifting process and no developer or site owner has expressed an interest in developing the site to Wandsworth Council. LP54 Open Space, Sport and Recreation sets out that proposals cannot develop on existing playing pitches unless certain criteria are met.
Proposed Change	No change considered necessary
Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	

Comment ID	228
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth local plan</p> <p>Thank you for consulting Sport England on the above named document. Please find herein our formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: http://www.sportengland.org/facilities-planning/planning-for-sport/</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	

Comment ID	229
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Site allocations and playing field provision</p> <p>Development that would either involve the loss of playing field or prejudice the use of the playing field (for example, housing immediately adjacent to an existing playing field) would be strongly resisted by Sport England.</p> <p>I note that there is no inclusion of the Bank of England sports centre and playing field site (Roehampton) in the Local Plan site allocations. I would like to note that this is a strategically important site and it is Sport England's strong desire that this site is protected for sport, particularly as we are aware that discussions over a change of ownership are ongoing, albeit these have been somewhat delayed by the onset of the Covid-19 pandemic. This is particularly important in light of the fact that uncertainty over the future of the site has led to some users being unable to access the site and seeking access to facilities elsewhere.</p> <p>I note there is no inclusion of the Springfield hospital site. I am aware that the planning permission for this site is currently being implemented. I would remind the Council that this site formerly included a formal sport facility, and the appeal was allowed on the basis that the site would include both 'active and passive sports', it is important to Sport England that a portion of the site is allocated for formal sport. I understand the applicant is currently carrying out a study via a consultancy to determine the most appropriate sports provision for this site. Sport England, NGBs and local clubs would all derive significant comfort from the allocation of a portion of the site for formal sport.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The Bank of England Site was considered post Regulation 18 Local Plan consultation as outlined in the Site Allocation Methodology Paper. The site is not within any of the designations that were considered at the initial phases of the sifting process and no developer or site owner has expressed an interest in developing the site to Wandsworth Council.</p> <p>LP54 Open Space, Sport and Recreation sets out that proposals cannot develop on existing playing pitches unless certain criteria are met.</p> <p>There is a site allocation for Springfield Hospital (OUT3).</p>
Proposed Change	No change considered necessary
Consultee Full Name	Laura Hutson

Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	230
Title	Paragraph
Number	3.19
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Playing Pitch Strategy</p> <p>The Local Plan should be informed by a robust and up to date assessment such as the Playing Pitch Strategy which I am aware is in the process of being completed for Wandsworth and due to be completed by the end of 2021. Once completed and adopted, Sport England would consider this to be a robust part of the evidence base for sport; this is welcomed.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. An updated Playing Pitch Strategy is expected to be considered for adoption in Autumn 2022.
Proposed Change	No change considered necessary

Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	231
Title	LP54 Open Space, Sport and Recreation
Number	Policy 65
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Protecting playing fields and sport facilities – LP56 Open Space, Sport and Recreation</p> <p>Currently the NPPF states:</p> <p><i>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <ul style="list-style-type: none"> • <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements</i> • <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location</i> • <i>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</i> <p>Sport England notes the inclusion of this text in the Local Plan as supporting text for this policy and is supportive of this inclusion.</p> <p>However, Sport England feels that the text of policy LP56 itself potentially contradicts this NPPF paragraph. It states:</p> <ol style="list-style-type: none"> 1 <i>Any proposal that would result in a loss of sports pitches, playing fields, or land last used for outdoor sport, or which would prejudice the land's future use for sport in terms of quality or quantity of facilities, will not be permitted unless it can be clearly demonstrated that:</i> 1 <i>it would provide open space and/or secure public access to private facilities in areas identified as deficient in open space, play space or sport and recreation facilities; and</i> 1 <i>it would meet the priorities identified in the Council's Playing Pitch Strategy, Open Space Study, Active Wandsworth Strategy, Parks Management Strategy or the relevant All London Green Grid (ALGG) Area Framework.</i> <p>Lost playing field generally cannot be replaced by playing field that already exists – there must be additionality in order for the NPPF exceptions to be met. Lost playing field can also only potentially be justified as surplus to requirements by the Wandsworth Playing Pitch strategy, and not any of the other studies mentioned in this policy. For the avoidance of doubt, Sport England would strongly suggest that this policy is reworded in order to make this clear and in line with the NPPF requirements.</p> <p>This policy also states:</p> <ol style="list-style-type: none"> 1 <i>Any proposal involving the loss of indoor sports facilities and recreation facilities will not be permitted unless it can be clearly demonstrated that:</i> 1 <i>there is no current or future need or demand for the facility, either in its current use or for any alternative sports or recreation use; or</i> 1 <i>replacement provision of an equivalent or better quantity and quality which supports any identified current and future need will be provided in an appropriate location.</i> <p>I am unclear as to the status of a current Built Facilities Strategy for Wandsworth Council, which would be required in order to assess point B1 of this policy. Without a robust and up to date assessment of indoor sports facilities, it is not possible to make a judgement as to current or future need or demand for the facility. I would be grateful if this could be clarified.</p>

	With regard to paragraph C of LP56, I would suggest that the provision of new sports facilities should also be justified by either the Playing Pitch Strategy or a Built Facilities Strategy, as appropriate, in order to ensure that facilities are located appropriately in areas of strategic need. This will also help ensure that such facilities are sustainable. Sport England is supportive of the desire to maximise the multiple use of facilities and encourage co-location of services between sports providers. Sport England also welcomes the support for the provision of sports lighting where appropriate.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The new Wandsworth Built Facilities Study is still being progressed and the existing study will be used as evidence in the interim. When it is prepared it can be shared with Sport England. LP54 Open Space, Sport and Recreation is considered sound and in line with the NPPF however to clarify this more accurately minor amendments could be made part A(1). The Local Plan is supported by a robust evidence base and the policy could be updated to include specific reference to these relevant pieces of work. The inclusion of reference to evidence base being up to date is considered unnecessary for inclusion at this time.
Proposed Change	<p>Amend wording in policy LP54 Open Space, Sport and Recreation as follows:</p> <p>A. Any proposal that would result in a loss of sports pitches, playing fields, or land last used for outdoor sport, or which would prejudice the land's future use for sport in terms of quality or quantity of facilities, will not be permitted unless it can be clearly demonstrated that:</p> <ol style="list-style-type: none"> 1. it would provide <u>additional replacement open space and/or secure public access to private facilities in areas identified as deficient in open space, play space or sport and recreation facilities; and of equivalent or better provision in terms of quantity and quality in a suitable location;</u> 2. it would meet the priorities identified in the Playing Pitch Strategy. <p>...</p> <p>C. Proposals for new, or improvements to existing, sports facilities and indoor recreation and leisure developments should:</p> <ol style="list-style-type: none"> 1. be developed in accordance with and meet the needs of the Playing Pitch Strategy <u>or the Built Facilities Study, as appropriate;</u>
Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	232
Title	Building a Strong Economy
Number	18

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Economic development</p> <p>Sport England wishes to highlight the fact that sport makes a substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. It is recognised that sport makes a valuable contribution to the economy, however Chapter 18 Building a Strong Economy focuses on the land use implications of certain defined economic uses, which include: office, research and development, light industry, general industry, storage and logistics/distribution, and appropriate sui generis uses / floorspace that relate to and support the industrial nature and operation of an area. This definition is set out in the Glossary.</p> <p>It is noted that the Local Plan takes a supportive approach to sports provision. Policy LP54 Open Space, Sport and Recreation sets out the framework for the protection and promotion of sports pitches, playing fields, land used for outdoor sport, and indoor sports facilities. In accordance with the NPPF, certain sport uses are included within the definition of town centre uses, which are promoted in appropriate circumstances under Policy LP42 Development in Centres.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Laura Hutson
Consultee Organisation Details	Sport England
Agent Full Name	
Agent Organisation Details	
Comment ID	233
Title	Sustainable Transport
Number	20
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Health and wellbeing – Active Design</p> <p>I note within the document that there are references to ensuring the health and wellbeing of residents, including a strong commitment towards Active Travel.</p> <p>Sport England believes these references would be further strengthened by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles.</p> <p>Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:</p> <p>Active design</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>Ten principles</p> <p>The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often. The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.</p> <p>http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Wandsworth Local Plan requires new developments to meet the Healthy Street objectives which is based on the "Healthy Streets for London Prioritising walking, cycling and public transport to create a healthy city" by the Mayor of London (2017). The forthcoming Wandsworth Walking and Cycling Strategy will also provide bespoke guidance for how developments can provide active travel improvements. Sport England's Active Design Guidance would still potentially be used as part of the determination of a planning application however it is not considered necessary to include here as the existing guidance referenced is sufficient.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Downing

Consultee Organisation Details	Downing
Agent Full Name	Tiffany Mallen
Agent Organisation Details	Senior Planner Rolfe Judd
Comment ID	234
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP4: Tall and Mid-rise buildings</p> <p>Policy LP4 sets out the criteria for the appropriateness of tall buildings and the areas for which tall buildings are considered to be appropriate (Appendix 2). The Policy specifically states that proposals for tall buildings will only be appropriate in identified zones and they will be assessed against the criteria set out in Part B. Part D states that buildings should not exceed the appropriate height range identified for each of the tall building zones.</p> <p>The tall building map has been based on an Urban Design Study (2021) which is a high-level assessment to identify suitable locations for tall buildings in the borough. Part C of the policy restricts any tall buildings outside of these zones, even where they demonstrate they meet the tall building criteria set out in Part B. Part D also restricts tall buildings to the 'appropriate height range' identified for each tall building zone, even if the site demonstrates they meet the criteria set by Part B.</p> <p>It is considered that the policy is unduly restrictive and should not restrict building heights where it can be demonstrated they meet the requirements of Part B of the same policy. This approach does not accord with the new London Plan.</p> <p>We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D).</p> <p>The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate.</p> <p>The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C.</p> <p>We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9.</p>

	<p>Recommendation</p> <p>The approach to the criteria assessment of Policy LP4 is broadly supportive, however, there must be flexibility within the policy to allow for building heights to differ from the 'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B. We therefore recommend the policy is updated to reflect the wording of the new London Plan and the clarifications of its implementation.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Regarding the Master Brewer judicial review Case, the Council considers that this should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Downing
Consultee Organisation Details	Downing
Agent Full Name	Tiffany Mallen
Agent Organisation Details	Senior Planner Rolfe Judd
Comment ID	235
Title	WT4 Gasholder Site, Armoury Way, SW18
Number	Statement 3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Site Allocation WT4</p> <p>Downing are supportive of the continued inclusion of the Site Allocation WT4 within the Local Plan Publication Version and Downing are committed to continue working with the Council and the adjoining landowners in developing a masterplan for the cluster and deliver the overall aims for the allocation. However, the proposed amendments to the site allocation are not considered to be justified.</p> <p><i>Height</i></p> <p>The site allocation is retained from the Employment and Industry Document but has been amended to include height restrictions on the site. The draft site allocation (WT4) partly locates the site within a 'tall building zone' according to Appendix 2 and is therefore considered suitable for tall buildings, subject to addressing the requirements of Policy LP4. However, the Site Allocation (WT4) sets a maximum appropriate height range of 7 to 10 storeys in this zone, with a maximum of 6 storeys to west of the Downing site.</p> <p>The height range imposed by this site allocation and the tall building maps (Appendix 2) are considered to be unduly restrictive and will not support the Council's other aspirations for this site. The height range of 7-10 storeys as a maximum would not be in line with the other developments coming forward in the immediate area, including the 36 storey tower immediately south of the site within the Ram Brewery. The suggested maximum heights are grossly underestimating the potential of this site and the investment required to remediate these contaminated industrial sites for redevelopment whilst delivering the significant number of benefits the Council require for the wider site allocation. These include; a 25% uplift in economic floorspace, residential uses including affordable provision and new walking and cycling routes into Wandsworth Town Centre . The aspirations for this site allocation coupled with the maximum appropriate height range places a significant financial burden on the proposed developments and there is no evidence to state this has been subject to financial viability testing. It is considered that these sites will not come forward for redevelopment and deliver the aspirations of the allocation unless higher densities than currently suggested can be supported.</p> <p>It is also noted within Policy PM2: Wandsworth Town that developments in the area of the Wandsworth Gyrotory will be required to provide funding, land or complementary measures to support its implementation. Map 4.1 outlines the area for 'potential land required for the realignment of the Wandsworth one-way system'. This area would potentially take away a significant portion of the southern element of Downing's site (2 Armoury Way). We do not consider that is viable to deliver the significant public benefits the site allocation requires without increasing the height and density of this site.</p>

	<p><i>Land use</i></p> <p>Downing support the Site Allocation requiring a mix of residential uses on the site. However, Downing require confirmation within the Local Plan that all types of residential can be supported. The London Plan recognises that Purpose Built Student Accommodation (PBSA), build to rent, large- scale purpose-built housing/co-living and specialist older housing all contribute to the Boroughs and wider London to deliver a variety of accommodation to meet local and strategic needs. The completion of new PBSA therefore contributes to London's overall housing need and is not in addition to this need (Paragraph 4.15.1 of the London Plan). It is therefore considered that the Site Allocation should explicitly state that all types of residential would be supported.</p> <p>Recommendation</p> <p>The allocation should:</p> <ul style="list-style-type: none"> - Allow for heights above the appropriate height range for the tall building zone where they meet the criteria set by Policy LP4 Part B. - Recognise the significant financial constraints the redevelopment of this former industrial site will incur, which will result in significant densities for the site allocation area to come forward and deliver the public benefits. - Amend the wording so that the residential uses on the site can include all types of residential accommodation including PBSA, Build to Rent, Older Living and Large-Scale Purpose-Built Accommodation/Co-living.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The approach to building height in this area is considered sound. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'restore' area as per the characterisation assessment of the UDS. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p> <p>Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p> <p>Site allocations can accommodate a range of residential accommodation, including housing for specific groups of people (such as older people and students) provided the Plan's aspirations for a mix of accommodation, types and tenures is demonstrated and needs are met</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Downing
Consultee Organisation Details	Downing
Agent Full Name	Tiffany

	Mallen
Agent Organisation Details	Senior Planner Rofe Judd
Comment ID	236
Title	LP28 Purpose Built Student Accommodation
Number	Policy 39
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP28: Purpose-Built Student Accommodation</p> <p>Policy LP28 is not consistent with the London Plan (2021) and therefore does not meet the tests set by Paragraph 35 of the NPPF.</p> <p>London Plan Policy H15 requires the majority of the bedrooms including all of the affordable student accommodation to be secured through a nomination agreement for occupation by students of one or more higher education provider. Paragraph 4.15.3 states that <i>‘there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed’</i></p> <p>Draft Policy LP28 Part 2 states that <i>‘proposals for PBSA will be supported where the development is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth.’</i> This policy is unduly restrictive and would not be in accordance with the London Plan.</p> <p>The wording of LP28 Part 2 restricts new PBSA to the borough of Wandsworth ‘or a reasonable travelling distance of Wandsworth’, which would not be in line with the London Plan. Furthermore, London Plan Paragraph 4.15.3 clearly states that the strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period. There is a need for more student accommodation to serve the strategic needs of London, not just the borough of Wandsworth. It is not considered that Policy LP28 meets the test for being effective, in accordance with the NPPF Paragraph 35.</p> <p>Recommendation</p> <p>Downing consider that LP28 Part 2 is unduly restrictive and would not meet the tests of the NPPF in that it is not effective or consistent with the London Plan. LP28 Part 2 should be deleted.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.

	Whilst there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed, the Local Plan ensures that the occupiers of the development have an opportunity to get to the educational establishment it is linked to. This is necessary to ensure that students are not disadvantaged by unreasonable travel times and disproportionate travel costs. Reference to establishments within or close to Wandsworth is therefore justifiable. The policy does not limit the agreement only to Wandsworth.
Proposed Change	No change considered necessary
Consultee Full Name	Downing
Consultee Organisation Details	Downing
Agent Full Name	Tiffany Mallen
Agent Organisation Details	Senior Planner Rofe Judd
Comment ID	237
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>We write on behalf of Downing to make representations on the London Borough of Wandsworth's Local Plan (regulation 19 version) which is out for public consultation. Our representations principally relate to;</p> <ul style="list-style-type: none"> • Policy LP4: Tall and Mid-rise buildings • Site Allocation WT4: Gasholder Cluster • Policy LP28: Purpose Built Student Accommodation <p>Downing have a significant interest in the Site Allocation WT4: Gasholder Cluster in particular the land at '2 Armoury Way' at the southern end of the site allocation. The Local Plan Publication version will directly influence and impact the future development of this site and as such are keen to discuss the impact of the policies with the Council to ensure these are appropriate to the area.</p> <p>For ease, the site (known as 2 Armoury Way) within the ownership of Downing is outlined below in blue:</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No changes considered necessary.
Consultee Full Name	City Land (UK) Ltd
Consultee Organisation Details	
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	238
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>London Borough of Wandsworth Local Plan; Publication (Regulation 19) Version Consultation (January 2022)</p> <p>We write on behalf of our client City Land (UK) Limited, to make representations on the London Borough of Wandsworth Draft Local Plan (Reg 19 version) which is out for consultation. These representations are written with specific reference to the following site:</p> <ul style="list-style-type: none"> - Ransomes Dock, 35-37 Parkgate Road SW11 4NP <p>Our client acknowledges that their site falls within the proposed Focal Area Strategy under policy LP59 (Riverside Uses, including River-dependent, River-related and adjacent Use), Draft Policy PM9 (Wandsworth's Riverside), and Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03 within Appendix 2 and controlled via Draft Local Plan Policy LP4 (Tall and Mid-rise Buildings).</p> <p>We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.</p> <p>The Site</p>

The application site is a rectangular shape (0.27ha) located on the northern side of Parkgate Road. The site consists of three buildings that comprise of a mixture of offices, business units, residential accommodation and a roof top conservatory on top of Buildings 1 and 2; with a restaurant, business units and residential accommodation at first floor and penthouse levels in Building 3.

Buildings 1 & 2 are located along the western side of the site and Building 3 is located in the north eastern corner of the site backing onto the dock. On the south-east side of the buildings is an open courtyard used for car parking. The Ransomes Wharf development lies to the north and west; Ransomes Dock to the east; four-storey residential maisonettes exist opposite on the south side Parkgate Road.

The site has been subject to a full planning application (2019/4915) for the following works:

'Demolition of the existing second floor extension to Buildings 1 & 2. Alterations including erection of two-storey extension above Buildings 1 & 2 at second and third floor levels; installation of replacement electricity substation; installation of new link bridge between Building 2 and Building 3; installation of new and replacement external access staircases, in connection with the provision of five new residential units (4 x 3-bedroom units and 1 x 4- bedroom unit) and use of basement for flexible B1/D1 uses, with associated new cycle parking at ground floor level'.

The application was given resolution to grant at Planning Committee in February 2021 and the decision notice was signed off on 1st March 2021.

Proposed Area for Review

A number of key changes are sought to the Draft Local Plan which affect the Ransome Dock site. These changes are summarised below:

- Appendix 2 of the Draft Proposed Local Plan
- Policy LP4 Tall and Mid-Rise Buildings
- PM9 Wandsworth's Riverside

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

Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary.

Consultee Full Name	City Land (UK) Ltd
Consultee Organisation Details	
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	239
Title	Tall Building Zone TB-B2-03 and TB-B2-04
Number	Map 23.10
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Appendix 2 of the Draft Proposed Local Plan</p> <p>Draft Appendix 2 of the Regulation 19 version of the plan acknowledges that the site fall within Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03, each shown below:</p> <p>The emerging policy wording of LP4 states that any site outside of these designations would be an inappropriate location for a tall or mid-rise buildings. Our client welcomes the designation of the site within both of these designations, particularly the fact the majority of the site falls within the 'tall buildings' designation. The designation clearly recognises the significant number of developments surrounding the site which have all been featured tall buildings, including, but not limited to:</p> <p>Planning Ref: 2014/3837 Ransomes Wharf, 27-33 Parkgate Road and 2-42 Elcho Street SW11 4NP Demolition of existing buildings and redevelopment of the site to provide new buildings ranging from 3 to 10 storeys in height comprising 118 residential units including affordable housing (Use Class C3), and 2,282m2 of flexible commercial floorspace (Use Classes A1- A4/B1/D1/D2), together with associated car parking, open space, landscaping and infrastructure works.</p> <p>Planning Ref. 2017/6064 (as amended by 2018/2641) RCA, 1-11 & 15-25 Howie Street 1-4 Elcho Street 7-9 & 15-25 Parkgate Road and Southern section of Radstock Street SW11 4AS Demolition of existing buildings and redevelopment of site to provide a part 4-storey (23.43m high) and part 8-storey (32.75m high) college building (D1 use class) with ancillary uses including business incubators, academic research and conferencing space, to also include a cafe (A3 use class) with new shopfront accessed from Parkgate Road and shop (A1 use class) accessed from Howie Street, together with public realm, highway and parking (including cycle parking), waste storage, plant, including photovoltaics at roof level and associated works), to allow a change to the external appearance of the research building from Level 2 and above and layout of Level 7.</p>

	<p>Both applications referenced above have demonstrated that tall and mid-rise buildings are suitable within this location.</p> <p>The current planning permission on the Ransomes Dock site would create a 'mid-rise' 5 storey building' through the creation of 'sky houses' on top of 'Building 2' as shown below.</p> <p>This indicated that there is existing precedent for taller buildings on site. Whilst the sensitivities of the surrounding area are acknowledged, the principle for greater scale has already been established on the site, therefore the policy is correct in recognising opportunities for additional height in this location as part of the future local context height. It is envisaged that Ransomes Dock site can achieve similar or greater building heights to its neighbours whilst complying with the criteria of draft policy LP4.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	City Land (UK) Ltd
Consultee Organisation Details	
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	240
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D). The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate. The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are

	<p>listed in Part C. We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.</p> <p>Please refer to accompanying statement for further details</p>
Change(s) considered necessary	We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The Council considers that the Master Brewer judicial review Case should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.
Proposed Change	No changes considered necessary.
Consultee Full Name	City Land (UK) Ltd
Consultee Organisation Details	
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	241
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP4 Tall and Mid-Rise Buildings</p> <p>As highlighted above, draft Appendix 2 of the Regulation 19 version of the plan acknowledges that the site fall within Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03. Both designations are welcomed by our client.</p> <p>Policy LP4 defines a 'tall building' as:</p>

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

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

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

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

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

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

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

The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate. As such, it is considered that the 'mid-rise' designation covering the southern portion of the site should not automatically prevent our client from proposing a building height which exceeds the recommended range.

We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings. This would enable buildings to exceed the ranges given in both the 'tall' and 'mid rise' designations where the proposals are found to be in line with Part B of Draft Policy LP4.

Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations. The Council considers that the Master Brewer judicial review Case should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.
Proposed Change	No changes considered necessary.

Consultee Full Name	City Land (UK) Ltd
Consultee Organisation Details	
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	242
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><u>PM9 Wandsworth's Riverside</u></p> <p>Draft Policy PM9 (Wandsworth's Riverside) provides a set of policies relating to sites along Wandsworth's Riverside. Ransomes Dock previously fell within a 'Focal Point of Activity' designation and it is acknowledged that this designation has been upheld under the Draft Local Plan.</p> <p>Part B (3) of the policy states that new developments should:</p> <p><i>'Promote residential-led development in the Focal Points of Activity'</i></p> <p>The principal of this is supported by our client as residential led-development will ensure that there is a critical mass of residents within this location in order to utilise the range of services within the Focal Point of Activity itself.</p> <p>Part B (4) states:</p> <p><i>'Existing economic floorspace within the Economic Use Protection Areas, Focal Points of Activity, and railway arches should be protected, and redevelopment should explore the opportunity for the intensification of industrial uses, where appropriate'</i></p> <p>The policy allows for intensification of industrial uses but does not provide sufficient flexibility for office/commercial uses. In the case of Ransomes Wharf, the existing office space is not purpose-built and therefore the layouts are inefficient which leads to inefficiencies and a reduced employment density. A full redevelopment of the site could incorporate a more appropriate layout which would create an efficient floorplate, meaning that a greater employment density could be achieved over a smaller area.</p>

	<p>Furthermore, these class E uses have flexibility to change to any use falling with this use (commercial, retail, restaurant or services), each of which are encouraged within Focal Points of Activity under Part G of Draft Policy LP59 (Riverside Uses, including River-dependent, River-related and adjacent Uses). As such, flexibility should be given to new developments to allow change of use to these use classes as they will accord with LP59's aim to '<i>create vibrant and active places</i>'.</p> <p>For the reasons given above, it is recommended that the Council continues to encourage residential- led development within Focal Points of Activity, whilst also incorporating wording within Policy PM9</p> <p>B(4) to allow for the intensification and diversification of office/commercial uses in these locations in order to benefit the Focal Points of Activity and intensify inefficient or surplus commercial space.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Proposals for new office floorspace should be assessed in accordance with Policy LP33 (Promoting and Protecting Offices), which outlines a hierarchical approach to the location of new office floorspace.</p> <p>This approach is considered to be consistent with the NPPF and is informed by the borough's Employment Land and Premises Study, which sets out the identified need for both office and industrial floorspace. The latter are particularly encouraged in this location given the relatively constrained supply and the quantum of need identified.</p> <p>Amendments to this policy have been suggested in response to representations made by Heliport London Ltd, comment #604.</p>
Proposed Change	No change considered necessary as a result of this representation, however please see changes suggested in response to the representation from Heliport London, comment #604, which is relevant to this section.

Consultee Full Name	City Land (UK) Ltd
Consultee Organisation Details	
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	243
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Summary and Recommendations</p> <p>In conclusion, our client welcomes their site being included within both the 'Tall' and 'Mid-Rise' Building Designations in Appendix 2 of the Draft Local Plan. The majority of development aims within the allocations align with our aspirations for the site which is welcomed, however, greater flexibility needs to be given to the potential height ranges within these designations to allow justification for greater heights where they can be justified under Part B of Draft policy LP4.</p> <p>We make the following recommendations:</p> <ul style="list-style-type: none"> - The allocation of the site within Tall Buildings Designation TB-B2-04 and Mid-Rise Building Designation MB-B2-03 within Appendix 2 of the Draft Local Plan is welcomed and we encourage the Council to uphold these designations within the final version of the Local Plan. - Incorporate flexibility within policy LP4 to allow for building heights to differ from the 'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B. We therefore recommend the policy is updated to reflect the wording of the new London Plan and the clarifications of its implementation; - Continue to encourage residential-led development within Focal Points of Activity, but also incorporate wording within Policy PM9 B(4) to allow for the intensification and diversification of office/commercial uses in these locations. <p>We would welcome the opportunity to meet with the Wandsworth Policy team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework. Any future Local Plan should recognise the scale of development, and the mix of uses already established through the extant planning permission for the site.</p> <p>We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No changes considered necessary.
Consultee Full Name	RBKC Pension Fund
Consultee Organisation Details	
Agent Full Name	Mr Adam Garcia
Agent Organisation Details	CBRE
Comment ID	244
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	On behalf of our client, Royal Borough of Kensington and Chelsea Pension Fund (the Fund), CBRE has been instructed to submit representations to the Wandsworth Draft Local Plan: Publication Version. The Fund has a land holding within LB Wandsworth across 36-46 St John's Road and 17 Severus Road in Clapham Town Centre. The Fund purchased the site in March 2020, and we previously responded to the Pre-Publication Version of the Draft Local Plan, on 01 March 2021. Separately, we had conversations with the LB Wandsworth policy team regarding the site and were encouraged to put it forward for a site allocation at this previous stage of the consultation. The majority of the site is located along St John's Road, but it also faces onto Severus Road and Eckstein Road. Given the town centre location, proximity to public transport (the site has a 6b PTAL rating-meaning excellent), the relatively limited constraints that the site is subject to and the apparent development potential of the site, we consider that it is a clear and sustainable development opportunity that should be given a specific allocation within the Local Plan. Our representations to the above consultation are made in this context. The SiteThe site extends to an area of approximately 0.23ha. Currently at ground floor, L'Occitane (46 St John's Road), Waitrose (40-44 St John's Road) and Superdrug (36 St John's Road) occupy the site along the St John's Road street frontage, providing c. 1,800 sqm of ground floor retail space. 46 St John's Road lies on the corner of the site (St John's Road/Eckstein Road) and extends to three storeys in height. The Waitrose and Superdrug units are located within the art deco façade facing onto St John's Road. The third storey of the façade is false meaning the accommodation only extends to first floor level. The roof of the buildings is occupied by various forms of plant. The site ownership also includes 17 Severus Road which houses eight residential units. Given the sustainable location of the site, we consider it could come forward for redevelopment within the Local Plan period (likely 8-12 years). There have been some recent developments in the surrounding area proposing a double height additional storey (six storeys total) additional height, including the development at the Arding and Hobbs department store and at 37-39 St John's Road, adjacent to the site.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	Asper our representations, we consider elements of the plan to be unsoundand therefore, we wish to participate.
Council Response	Comment noted. These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary.
Consultee Full Name	RBKC Pension Fund
Consultee Organisation Details	
Agent Full Name	Mr Adam Garcia
Agent Organisation Details	CBRE
Comment ID	245
Title	CJ7 36-46 St John's Road and 17 Severus Road
Number	Statement 42
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Site Allocation CJ7, St John's Road and 17 Severus Road: We have reviewed the proposed wording for the Site Allocation and, on the whole, are in agreement with its wording and support the identification of the site as being suitable for development and for uses including retail, hotel, office, residential. There are however some instances where we consider the wording should be revised, as follows. Paragraph 6.89 -Site Layout Current words: The site has frontages on to St. John's Road, Eckstein Road and Severus Road. The ground floor of St John's Road is a primary retail frontage. The Severus Road frontage currently has an office frontage associated with the retail use. Severus Road is part residential. A retail frontage on to St John's Road is required with upper floors of class E or residential. For Eckstein Road a commercial frontage at ground floor is possible with residential or offices/hotel above. For SeverusRoad frontage residential or hotel uses to all floors is appropriate. Proposed words:

	<p>The site has frontages on to St. John's Road, Eckstein Road and Severus Road. The ground floor of St John's Road is a primary retail frontage. The Severus Road frontage currently has an office <u>a back of house</u> frontage associated with the retail use. Severus Road is part residential. - A retail frontage on to St John's Road is required with upper floors of class E or residential. For Eckstein Road a commercial frontage at ground floor is possible with residential or offices/hotel above. For Severus Road frontage residential or hotel uses to all floors is appropriate. Redevelopment of the site for residential/office/hotel use is appropriate and the ground floor frontage on to St John's Road should be retail.</p> <p>Comments: The site is currently arranged as multiple buildings/addresses. Such an arrangement does not optimise the efficiency of the site's footprint as it involves multiple cores, entrances and other unproductive spaces. The current wording of the allocation maintains this inefficient arrangement, and seemingly imposes a requirement for multiple uses across the site, rather than allowing for a design and/or market driven decision to be made regarding the site's land use composition.</p> <p>The proposed revised wording ensures that the allocation is sufficiently flexible to be effective (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which: •makes effective use of land (NPPF Para 120) by maximising net internal area and enabling efficient floorplates to be delivered; •enables rapid response to changes in economic circumstances (NPPF Para 82.d) through the identification of the site as being appropriate for various land uses; •ensures that the character and vitality of the town centre are protected/enhanced, which is an objective of the Draft Plan, through the requirement to provide a retail frontage at St John's Road. •is unambiguous, allowing for a clear and concise understanding of the site's land use requirements. Paragraph 6.92 -Building Heights Current words: In accordance with the tall and mid-rise building maps in Appendix 2, the site is not located in a tall or mid-rise building zone. Development proposals for tall or mid-rise buildings will not be supported.</p> <p>Proposed words:</p> <p>-In accordance with the tall and mid-rise building maps in Appendix 2, the site is not located in a tall or mid-rise building zone. Development proposals for tall buildings will not be supported. Specific building heights on the site will be established through a design-led process, in accordance with strategic policy.</p> <p>Comments: We consider that ruling out any possibility of mid-rise buildings on the site is not in general conformity with Policy D9 of the London Plan, which states that Tall Buildings should not be defined as constituting less than 6 storeys. We recognise that the Draft Plan distinguishes between 'mid-rise' and 'tall' buildings, but the effect of restricting development to fewer than 6 storeys is essentially the same. We also consider that this approach is not consistent with Policy D3 of the London Plan, which states that "all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth". In this policy context, it is conceivable that additional floor/floors have the potential to be acceptable. The proposed revised wording ensures that the allocation is in conformity with the London Plan, as required by Section 24 of the Planning and Compulsory Purchase Act (2004). It also ensures that the allocation is sufficiently flexible to be effective (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which: •optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (NPPF Para 130.e). Considering the site's location within a town centre, with high connectivity, the current site allocation is not considered to optimise site capacity; •makes efficient use of land (NPPF Para 124) as the site is located within an area of high public transport accessibility (PTAL 6b) and therefore can promote sustainable travel modes. As such, a higher density development than currently envisaged would be appropriate; •makes effective use of land (NPPF Para 120) by promoting under-utilised buildings where this would help to meet identified needs for housing where such sites can be used more effectively.</p> <p>Summary In conclusion, we continue to be supportive of the principle of the Site Allocation but believe the above amendments will serve to avoid any ambiguity in understanding the site requirements, and allow for any forthcoming scheme to be developed through the design-led approach, that optimises the site's capacity. It is our view that, in absence of these amendments, the site allocation will remain unclear and due to this, it is unlikely to be effective. Effectiveness is one of the tests of soundness within the NPPF. The definition of mid-rise buildings and application of this policy approach to the site will also fail to be in general conformity with the London Plan. Given the Regulation 19 stage of the plan, our client wishes to reserve the right to be able to participate in any forthcoming Examination in Public.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	As per our representations, we consider elements of the plan to be unsound and therefore, we wish to participate.
Council Response	<p>Support noted, including for the potential redevelopment of the site to incorporate uses including retail, hotel, office and residential.</p> <p>It is agreed that paragraph 6.89 could be rationalised and clarified. The appropriate uses for the site are established in general terms in the site allocation (paragraph 6.82) and in more detail under the 'Development Considerations - Uses' (paragraph 6.83). Reference within the 'Design Requirements - Site Layout' should focus on the spatial arrangement of the redevelopment, of which the key aspect is the provision of retail frontages on St. John's Road in accordance with the Core frontages policy (as set out in LP42). Neither Severus Road nor Eckstein Road are defined as Core, Secondary or Other frontage, and as such active uses at the ground floor level are not required (although they would be permissible as they fall within the town centre boundary). Since further detail on the site layout is set out within this paragraph, it does not need to be included within the broader site allocation in paragraph 6.8.2, where reference to 'ground floor' should be removed as certain commercial uses (such as office or hotel, or indeed certain retail uses) would be appropriate on upper storeys too.</p>

	<p>The reference to an office frontage on Severus Road in paragraph 6.89 is incorrect and should be amended to refer to the back of house frontage associated with the retail use.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance.</p> <p>The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition. This approach is considered to be positive in identifying further opportunities for development in the borough consistent with the character of the surrounding area.</p> <p>In accordance with London Plan Policy D3, optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The Urban Design Study balances the demands (potentially competing) between optimising the use of sites to deliver required growth, and ensuring that well-designed places that reflect existing character are delivered.</p>
Proposed Change	<p>Amend paragraph 6.82 as follows:</p> <p>"Mixed use <u>development</u> including residential and ground floor commercial uses."</p> <p>Amend paragraph 6.89 as follows:</p> <p>"The site has frontages on to St. John's Road, Eckstein Road and Severus Road. The ground floor of St John's Road is a primary <u>Core</u> retail frontage. The Severus Road frontage currently has an office <u>a back of house</u> frontage associated with the retail use. Severus Road is part residential. A retail frontage on to St John's Road is required <u>on the ground floor</u> with upper floors of class E or residential. For Eckstein Road a commercial frontage at ground floor is possible with residential or offices/hotel above. For Severus Road frontage residential or hotel uses to all floors is appropriate."</p>
Consultee Full Name	Charities Property Fund
Consultee Organisation Details	
Agent Full Name	Mr Tim Price
Agent Organisation Details	savills
Comment ID	246
Title	RIV10 200 York Road, Travelodge Hotel, SW11
Number	Statement 65
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	

**Details of reason(s)
for representation**

Draft Site Allocation RIV10

As set out above, the Site is proposed to be allocated for residential and commercial development in the emerging Wandsworth Local Plan under Allocation Reference RIV10.

SIM supports the identification of this allocation in principle. The redevelopment of this site will help to meet strategic objectives in terms of residential land supply, economic growth and employment generation within Wandsworth in the mid to long term.

The allocation is also identified to form part of a tall building zone (TB-B2-06) where the Council has established that higher densities would be appropriate. Again, SIM welcomes the recognition of this potential and is supportive of the principle of tall buildings being delivered at the Site.

Notwithstanding the above, SIM strongly opposes the introduction of maximum appropriate height range of 7-10 storeys for the allocation as set out at paragraph 11.69, given the issues with the accuracy and application of the evidence base which has been used to determine those parameters.

SIM would also request that greater flexibility is afforded by the Site Allocation to enable the re-provision of the existing hotel facility as part of any comprehensive mixed use development scheme.

We provide further analysis of the component parts of the draft Site Allocation and our suggested amends to these below where relevant.

Paragraph 11.66

Paragraph 11.66 of RIV10 states that the allocation is proposed for “*residential development and commercial uses that include opportunities for affordable creative workspace*”.

Whilst SIM supports the proposed allocation of the site for residential led development in principle, we request that the allocation should be amended to include the delivery of new hotel accommodation as part of a mixed use development scheme.

The support for such uses would allow for the re-provision of the existing hotel facility (Travelodge) at the Site in a highly accessible and sustainable location close to the River Thames and major rail infrastructure to the overall benefit of the Borough's visitor economy.

This amendment also accounts for the fact that there is limited space at the Site (which is only 0.25ha) for additional commercial uses which would be able to create an active ground floor frontage onto York Road. Given these constraints it is proposed that a replacement hotel facility would be better placed to incorporate facilities such as a café / restaurant at ground floor level as part of a more integrated offer which is primarily focused at guests. This would also align with the strategy for limiting the delivery of commercial floorspace at site allocations within Wandsworth's Riverside to serving local needs only.

We request that Paragraph 11.66 of Site Allocation DIV10 is amended to include specific support for residential, hotel and commercial land uses. In particular, we propose that the policy text which relates to the proposed uses to be delivered by the site allocation be updated to read as follows:

“Mixed use development including residential uses, re-provision of existing hotel facility with commercial uses which serve local needs”.

The above alteration would ensure that the Plan is positively prepared and will make the most effective use of previously developed land. Furthermore, it would enable any future development scheme to respond appropriately to market forces in terms of what is a viable and deliverable. This flexibility is critical and is demonstrative that, prior to comprehensive redevelopment, asset management objectives for the existing hotel floorspace would not be considered to prejudice the longer term aspirations of the emerging Local Plan.

Paragraph 11.67

Paragraph 11.67 states that Site Allocation RIV10 has the potential, when developed in conjunction with Gartons Industrial Estate (RIV4) and the surrounding area, to become a new creative quarter within this part of the focal point area.

SIM supports the aspirations for the new 'creative quarter' but reiterates the requirement for any redevelopment to include the provision of a replacement hotel to support the wider commercial function of the locality, for the reasons set out above.

Paragraph 11.68

Paragraph 11.68 states that the allocation should aim to contribute to the townscape and pedestrian amenity in York Road and contribute to the provision of a new public space at the junction of Gartons Way and York Place.

SIM supports the aspirations as set out at paragraph 11.68 and would reiterate that the development of their Site presents a major opportunity to enhance the townscape and condition of the public realm along York Road. Notwithstanding this, it is noted that the ability to secure these improvements will only be realised if a viable development scheme can be delivered at the Site. It follows that the realisation of these benefits is directly linked to the height and density which can be achieved at the allocation.

At present, the capping of heights to 10 storeys as currently proposed by the draft allocation is not justified and would significantly limit the prospects of delivering a viable development scheme. This would ultimately mean the wider regeneration objectives (e.g. improved public realm and contribution to a defined Focal Point of Activity) could not be achieved.

Paragraph 11.69

Paragraph 11.69 states that the maximum appropriate height range for tall building zone TB-B2-06 is 7 to 10 storeys. As such, it is intimated that the height of any developments within that zone should not exceed the identified maximum appropriate heights in line with Policy LP4 of the Local Plan.

The introduction of the maximum appropriate height range has been informed by analysis undertaken by Arup which is presented in the December 2021 Urban Design Study and forms part of the technical evidence base for the Wandsworth Local Plan.

As set out in the Executive Summary, we consider that the findings of the Urban Design Study do not support the proposed limitation on maximum building heights currently proposed for Site Allocation RIV10. Accordingly, we set out our own analysis below to challenge this position. This includes consideration of the specific urban design and townscape considerations applicable to the Site, review of the methodology undertaken by Arup to inform its findings and our overall conclusions which support the potential for significantly taller buildings at Allocation RIV10.

1 *The Site and its context – urban design and townscape considerations*

The Site, is located on the northwestern side of York Road, approximately 120m south east of the River Thames. It currently accommodates a Travelodge hotel, in a 'H' plan, with surface parking either side of the main wing. The southeastern block of the hotel rises to three storeys, with the remainder two blocks rising to five storeys, with plant and telecommunications aerials above. The existing building on the site is of poor architectural and urban design quality, with limited active frontages (including onto York Road itself). The building also sits at an odd angle to York Road, further exacerbating its poor relationship with the streetscape and the immediate context around it.

The Site is not located in any of the London View Management Framework (LVMF) viewing corridors, nor is it located in any of the Wandsworth Local or Designated views or Views of Interest (as shown in Fig. 70 of the December 2021 Urban Design Study).

As set out above, Arup conducted an Urban Design Study: Characterisation, development capacity and design guidance for Wandsworth Borough Council, which was published in December 2020. A further, updated version of this study, entitled Urban Design Study – Executive Summary: Characterisation, development capacity and design guidance was published in December 2021.

The Site is identified in both studies in the B2 Battersea Riverside area with minimal changes between the two versions in the analysis of key characteristics, valued features, negative qualities, building types, strategy and character area design guidance. Critically, the Site was deemed to be located within an area of 'lower sensitivity', 'higher probability for change' and 'higher development capacity' at pages 8, 9 and 10 of the 2021

Urban Design Study. This necessarily forms the spatial context for the consideration of what is an appropriate height for site specific applications.

Furthermore, it is noted that the Battersea Riverside Character Area is identified to have a low sensitivity to change with potential for targeted growth with the exception of Battersea Conservation Area (which has high sensitivity) at page 63 of the 2021 Urban Design Study. In comparison it is noted that the Character Area was deemed to have a medium sensitivity to change with potential for targeted growth at page 71 of the 2020 Urban Design Study. This represents a material reduction in the level of sensitivity which is to be applied to the Character Area between the two studies and demonstrates the lack of any evidence based justification for the height limit of 10 stories as currently proposed. Given that the 2020 Study previously informed the context for taller buildings of 8 storeys or more being considered appropriate at Allocation RIV10 it is inconceivable that a lower degree of sensitivity to change could support a reduction in height. Conversely, a lower degree of sensitivity should in fact allow for more flexibility in future development, which should also apply to height.

The Site in its current condition is a negative contributor to the townscape. The emerging immediate context of the Site is one of tall buildings, with the Coda development to the northeast (on the other side of Gartons Way) and Plantation Wharf (closer to the River) rising at 24 and 18 storeys respectively. This context, and the Site's setting away from the river and its corner position on a busy road make it an entirely appropriate location for a taller landmark building.

1 Identification of Site Allocation RIV10

A Pre-Publication Draft Local Plan was published for consultation in November 2020 by the Council. In it, the Site is identified as site allocation RIV10 and under Design Requirements – Tall Buildings it states that: 'In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall building clusters and/or landmarks, and the height at which buildings will be considered as 'tall' is 8 storeys and above.

The Council subsequently published the Pre-Publication Draft Local Plan for consultation in January 2022, along with the Policy Map Changes document. The Site remains under site allocation RIV10, however it has been grouped into tall building zone TB-B2-06, along with RIV3 (11-25 Chatfield Road and 41-47 Mendip Road) and RIV4 (Gartons Industrial Estate). In the Building Heights section for RIV10 it states: 'In accordance with the tall building maps in Appendix 2, the site is located in tall building zone TB-B2-06. The maximum appropriate height range for the zone is 7 to 10 storeys, and the maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2.

We would question the change in height recommendations between Pre-Publication and Publication Draft Local Plans, as no material changes have been made to the Urban Design Study regarding Area B2 – Battersea Riverside. It also has to be noted that RIV10 is located 120m away from the river and therefore the relationship of the Site with the river is different to that of a site located on the river edge, for example RIV6 (TB-B2-05). The current position is not therefore supported by the Council's own evidence base.

1 Maximum height range of 7-10 storeys

As mentioned above, there have been no material changes in the analysis, conclusions and recommendations of the two Urban Design Studies (2020 and 2021) other than to recognise the reduction in the sensitivity to change for area B2- Battersea Riverside.

On this basis it is considered that no additional evidence has been presented to justify any further restrictive limitations on height at Site Allocation RIV10 beyond those that were originally set out within the Pre-Publication Draft Local Plan (i.e. 8 storeys or more).

The 2021 Urban Design Study simply appears to group allocations within newly created tall building zones. Site Allocation RIV10 forms part of tall building zone TB-B2-06, along with RIV3 (11-25 Chatfield Road and 41-47 Mendip Road) and RIV4 (Gartons Industrial Estate).

It should be recognised that these three sites have entirely different characteristics and considerations. Site RIV3, for example, is wedged between other sites and its frontages face two side streets, not a main arterial road, like the Site which forms allocation RIV10. The Site is more aligned in its characteristics, and location on a main road with site allocations such as CJ5 (forms part of tall building zone TB-B1-01), which has a proposed range of 7-20 storeys.

The justification for the imposition of a maximum height range of 7-10 storeys for tall building zone TB-B2-06 is set out at Section A.3.6 of the 2021 Urban Design Study (pages 232-235). This justification is guided by analysis of whether the zones would impact the townscape, local views and nearby heritage assets positively, negatively or neutrally. The assessment undertaken by Arup is stated to use three core types of information depending on the specific zone. These are set out at section 4.5.1 of the Study and include:

- analysis of existing tall buildings;
- analysis of consented tall buildings or area masterplans; or
- analysis of scenarios prepared specifically for this study.

Assessment of tall building zone TB-B2-06 is based on an 'analysis of scenario' as confirmed at Table 2 of the 2021 Urban Design Study. There is no explanation provided as to why Arup have taken this particular approach as opposed to an analysis of existing or consented buildings which would form the immediate context for a tall building zone.

At A.3.6 of the 2021 Urban Design Study tall building zones TB-B2-02, TB-B2-05 and TB-B2-06 are grouped for the purposes of assessment. It is stated that the existing prevailing height within these zones is 2-20+ storeys. This position incorporates the 24 storey Coda development scheme located at the corner of York Road and Gartons Way which is located within TB-B2-06, and is directly adjacent to the Site Allocation RIV10. It is subsequently stated that the appropriate height for the tall building zones within the three zones as covered at A.3.6 is 7-10 storeys (21-30m).

The justification for this position is set out in further detail at pages 233- 235 of the 2021 Urban Design Study. However, this only appears to include specific analysis of TB-B2-02 within the table at page 233 of the Study.

There is no comparable table provided for TB-B2-06 and therefore it is assumed that the principles adopted in respect TB-B2-02 have simply been applied for both.

Furthermore, it is noted that figures 275 (Riverside Cluster plan) and 274 (Riverside Cluster massing model) do not even make reference TB-B2-06 or Site Allocation RIV10. On this basis it is not clear as to how Arup have determined the appropriateness of any heights for any allocations within this tall building zone through the analysis that has been undertaken. Critically, the application of an analysis of scenario exercise which focuses specifically on TB-B2-02 does not sufficiently factor in the nature or appearance of certain areas within the Borough that already have established tall buildings such as TB-B2-06. Neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zones, which is a relevant consideration and warrants an analysis of existing and consented tall buildings.

The London Plan is explicit that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. The absence of these considerations for TB-B2-06 raises fundamental issues with the methodology which has been used to assess what can be considered to be an appropriate height of building.

In this case, there are already much taller buildings in the immediate vicinity of the Site, so the introduction of additional taller buildings of more than 10 storeys at Allocation RIV10 would not introduce new elements that fundamentally change the character that has been established or any long-distance views.

Within the 'Assessment' section of A.3.6 at page 235 of the Study it is stated that individual buildings will need to carefully consider the appropriate height for individual plots within the zone, and generally the greatest height should be located internally to the plot (stepping down to surrounding streets) and along York Road

Furthermore, it is noted that development in the north of the area should not exceed the existing tallest buildings excluding the 28 storey Lombard Wharf which should not set a precedent for very tall development in this location. This position, and reference to what is considered to be an existing landmarking building, appears contrary to the restrictive limitation of 7-10 storeys which is seeking to be imposed across all tall building zones.

The only reference to the appropriateness of height along York Road appears to be at the penultimate paragraph at page 235 of the Study where it is stated that "there is consent for two developments over 20 storeys". It is subsequently concluded that there is not considered capacity for any further very tall buildings over 10 storeys, principally due to the potential impacts on the character of the River Thames which is already substantially developed with tall buildings both up and downstream.

SIM would strongly question how such conclusions can be made, on the basis that little site specific analysis of TB-B2-06 appears to have been undertaken. Whilst it is acknowledged that TB-B2-06 does have a frontage to the River Thames the majority of this tall building zone is located along York Road, which is set back from the river by some 120m. It follows that any development in this location (including RIV10) would have minimal impacts on the character of the River Thames, and especially when read in the context of the immediate established context which includes buildings of 24, 18 and 16 storeys which are located within a similar proximity to, or closer to, the River.

It follows that the blanket imposition of a maximum height parameter of 7-10 storeys for tall building zone TB- B2-06 is not appropriate or justified in the context of Arup's principal concerns relating to potential impacts on the character of the River Thames. This zone is significantly larger than both TB-B2-02 and TB-B2-05 and as such offers greater flexibility for the introduction of a wider range of taller buildings in spatial terms.

The redevelopment of Site Allocation RIV10 for taller buildings than the maximum height parameter would accord directly with the analysis of scenario undertaken by Arup which confirms that the greatest height should be located internally to the plot and along York Road (page 235 of the Urban Design Study). It follows that limiting height in this location to the same extent as proposed for sites which are directly located on the River Thames is completely contrary to the evidence base and not justified.

There is no comparable table provided for TB-B2-06 and therefore it is assumed that the principles adopted in respect TB-B2-02 have simply been applied for both.

Furthermore, it is noted that figures 275 (Riverside Cluster plan) and 274 (Riverside Cluster massing model) do not even make reference TB-B2-06 or Site Allocation RIV10. On this basis it is not clear as to how Arup have determined the appropriateness of any heights for any allocations within this tall building zone through the analysis that has been undertaken. Critically, the application of an analysis of scenario exercise which focuses specifically on TB-B2-02 does not sufficiently factor in the nature or appearance of certain areas within the Borough that already have established tall buildings such as TB-B2-06. Neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zones, which is a relevant consideration and warrants an analysis of existing and consented tall buildings.

The London Plan is explicit that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. The absence of these considerations for TB-02-06 raises fundamental issues with the methodology which has been used to assess what can be considered to be an appropriate height of building.

In this case, there are already much taller buildings in the immediate vicinity of the Site, so the introduction of additional taller buildings of more than 10 storeys at Allocation RIV10 would not introduce new elements that fundamentally change the character that has been established or any long-distance views.

Within the 'Assessment' section of A.3.6 at page 235 of the Study it is stated that individual buildings will need to carefully consider the appropriate height for individual plots within the zone, and generally the greatest height should be located internally to the plot (stepping down to surrounding streets) and along York Road

Furthermore, it is noted that development in the north of the area should not exceed the existing tallest buildings excluding the 28 storey Lombard Wharf which should not set a precedent for very tall development in this location. This position, and reference to what is considered to be an existing landmarking building, appears contrary to the restrictive limitation of 7-10 storeys which is seeking to be imposed across all tall building zones.

The only reference to the appropriateness of height along York Road appears to be at the penultimate paragraph at page 235 of the Study where it is stated that “there is consent for two developments over 20 storeys”. It is subsequently concluded that there is not considered capacity for any further very tall buildings over 10 storeys, principally due to the potential impacts on the character of the River Thames which is already substantially developed with tall buildings both up and downstream.

SIM would strongly question how such conclusions can be made, on the basis that little site specific analysis of TB-B2-06 appears to have been undertaken. Whilst it is acknowledged that TB-B2-06 does have a frontage to the River Thames the majority of this tall building zone is located along York Road, which is set back from the river by some 120m. It follows that any development in this location (including RIV10) would have minimal impacts on the character of the River Thames, and especially when read in the context of the immediate established context which includes buildings of 24, 18 and 16 storeys which are located within a similar proximity to, or closer to, the River.

It follows that the blanket imposition of a maximum height parameter of 7-10 storeys for tall building zone TB- B2-06 is not appropriate or justified in the context of Arup’s principal concerns relating to potential impacts on the character of the River Thames. This zone is significantly larger than both TB-B2-02 and TB-B2-05 and as such offers greater flexibility for the introduction of a wider range of taller buildings in spatial terms.

The redevelopment of Site Allocation RIV10 for taller buildings than the maximum height parameter would accord directly with the analysis of scenario undertaken by Arup which confirms that the greatest height should be located internally to the plot and along York Road (page 235 of the Urban Design Study). It follows that limiting height in this location to the same extent as proposed for sites which are directly located on the River Thames is completely contrary to the evidence base and not justified.

Site Allocation RIV10 and other potential development sites located along York Road compare more similarly with some of those allocations within tall building zone TB-B1-01. It is noted that the Council has sought to apply more flexible parameters for what are deemed to be appropriate maximum heights within this zone with those sites located along York Road being considered for taller buildings of up to 20 storeys. This position is illustrated at Figure 244 (Battersea combined Tall and Mid-rise Building Zones map) where the use of different colours is used to represent a wider range of heights within a single tall building zone.

It is therefore entirely appropriate that SIM would request that a similar approach is taken in respect of tall building zone TB-B2-06 such that Allocation RIV10 is identified to support a similar range of building heights. This flexibility would ensure that any future development scheme at the allocation could be brought forward with regard to the characteristics of the Site and the existing context within which it sits (existing and proposed buildings of 20+ storeys). Notwithstanding this, the Council would still be able to exert sufficient control over what is deemed to be an appropriate height with any scheme being tested on a site specific basis as part of a future planning application.

In conclusion, we advocate that the proposed building heights recommendation for the Site (Allocation RIV10) in the Publication Draft Local Plan at 7-10 storeys is too restrictive, not justified or positively prepared. The Site’s corner location on an arterial road and its distance away from the immediate setting of the river should both afford greater flexibility for buildings of up to 20 storeys to be considered appropriate. We recommend that the evidence base should be re-visited and updated to reflect the Site’s potential and specific townscape and urban design qualities in isolation (both with regard to the grouping of TB-02-06 with other zones which exhibit entirely different spatial characteristics and separate to Allocations RIV3 and RIV4).

While it is appreciated that the emerging Wandsworth Local Plan and adopted London Plan provide broad guidance for wider London given that site allocations are the key strategic reservoir for new homes within the Borough we would question the logic of placing onerous restrictions on their capacity without undertaking more site specific analysis as part of the evidence base or detailed design development through the planning process. As such, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to the site specific and surrounding context.

It is considered that the Site presents an excellent opportunity for growth through wholesale redevelopment, which should be recognised through a site allocation in the Draft Local Plan. The site allocation would assist in bringing forward the residential-led redevelopment of a previously developed site in a highly sustainable location adjacent to the river.

The proposed capping of building heights of 7-10 storeys at the Site in the way currently proposed would significantly limit the prospects of securing redevelopment of the allocation on viability grounds, and also fails to make the most effective use of the Site.

The deliverability of sites allocated within the Local Plan is critical in order for the Council to meet their housing targets. For policy to rely, to the extent that it does, on a study that does not reflect proper consideration of the spatial characteristics or deliverability of sites is not in our view a sound approach and we would therefore propose that the text at paragraph 11.69 of Site Allocation RIV10 is amended as follows:

The maximum appropriate height range for Site Allocation RIV10 is adjusted such that it reflects the more immediate context of the Site and supports buildings of **7-20 storeys**. The tall buildings plan at Appendix 2 should be updated accordingly as well to reflect this.

This amendment would ensure that the delivery of Site Allocation RIV10 can fully optimise the development potential of the Site to realise the required increase in new homes alongside wider benefits linked to the delivery of commercial uses and Focal Points of Activity.

Summary and Conclusion

We trust that this consultation response will be fully considered by the Council and its contents afforded the appropriate level of weight. SIM would welcome the opportunity to meet with professional officers of the LPA to discuss these representations in more detail, as well as review the evidence base, its analysis and development options for the Site.

Our client reiterates its support for the identification of land at 200 York Road for allocation within the emerging Local Plan.

However, we wish to register our client's strong objection to the imposition of a maximum height range of 7-10 storeys as currently set out at paragraph 11.69 of the Publication Draft Local Plan. This range should be adjusted to allow for the potential of building heights of up to 20 storeys, in order for the Plan to be found 'sound'.

We would welcome the opportunity to discuss the contents of this letter with Officers in due course. The Response Form has also been completed and is included with this correspondence.

We would also be grateful if you could acknowledge receipt of these representations and keep us updated of any further stages of consultation, so that we can provide comments as may be required.

Should you require any clarification or additional information, please do not hesitate to contact Tim Price or Chris Moore at these offices.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comments noted.</p> <p>The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>Figures 212, 213 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity, probability of change / development capacity at a level of detail expected from a map of the borough. This is clarified in section 4.2 of the UDS: 'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily</p>

broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality.

The scenarios developed are prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site specific masterplan proposals. The tall building opportunity area zone maps of the UDS are a result of the detailed analysis of the Urban Design Study which includes an analysis of existing buildings and extant permissions. The character area summaries and criteria describe the various constraints that have been taken into consideration as part of the setting of tall building zones. Some of the existing tall buildings threaten the character of this area and therefore the tall building zones and their shading have been set with the aim to prevent further inappropriate building heights in relation to the design led approach.

The site allocation set out in paragraph 11.66 is for "residential development and commercial uses that include opportunities for affordable creative workspace". Hotel accommodation would fall under the definition of 'commercial uses' and is therefore consistent with the allocation. The allocation should be amended to clarify that not all the commercial uses must include 'opportunities for affordable creative workspace', but that the Council would like to see such uses brought forward on site as part of the wider mix (see also comments in response to representations received by Greystar Europe Holdings Ltd and Big Yellow Self Storage, #180). It is noted that LP46 sets out a resistance to the loss of existing bed spaces (in part E), and sets out the policy context for extensions to existing visitor accommodation (in part A). Please see amendments recommended in response to the representation submitted by the Tooting Development Company (#147), which relate to Policy LP46.

Proposed Change

Amend paragraph 11.66 in RIV10 as follows:

"Mixed-use Residential development incorporating residential and commercial uses, ~~that~~ including opportunities for affordable creative workspace."

Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	247
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Introduction</p> <p>This written representation is submitted by Savills (UK) Limited ('Savills') in response to the London Borough of Wandsworth Council's ('LBW') invitation to submit comments in respect of a public consultation on the Regulation 19 draft of the new Local Plan. These comments are submitted on behalf of Safestore PLC ('Safestore').</p> <p>Safestore are the owners of three sites within the London Borough of Wandsworth (LBW): Ingate Place in Battersea, 19 Lombard Road in Battersea and 1 Bendon Valley on Garrett Lane. This letter of representation will relate to the two Sites in Battersea, Lombard Road and Ingate Place. Safestore maintain their commitment to exploring the redevelopment potential of these Sites with the LBW in order to contribute to the wider growth of the Borough.</p> <p>Savills has made representations on behalf of these Sites during previous policy consultations. The most recent representations were made in response to the Regulation 18 Wandsworth Draft Local Plan: Pre-Publication version (November 2020). Prior to this, Savills has also made representations on the draft WeMadeThat Battersea Design and Technology Quarter Masterplan, the Wandsworth Local Plan: Full Review Issues Document (Regulation 18, December 2018) and GVA in response to the Employment and Industry Review (Proposed Submission and Policy Options Consultation Document, March 2017 and October 2016 respectively).</p> <p>Historically, there has been good dialogue between Safestore and the LBW, and we now look forward to continuing this extensive and productive engagement with the LBW and other key stakeholders on this important document.</p> <p>In addition to the observations set out, this representation is accompanied with the following:</p> <p>Urban Design & Townscape Analysis – prepared by Montagu Evans;</p> <ul style="list-style-type: none"> • Indicative Development Options Designed – prepared by Collado Collins; • Legal Opinion – prepared by Shoosmiths LLP; and • Financial Viability Appraisals for Indicative Development Options – prepared by Savills Viability.

These documents have helped us to understand the implications of the draft policy on the redevelopment opportunities of either sites. These are included under separate cover, but referenced within this note.

Executive Summary

- The Reg.19 Plan seeks to shape growth and change in Wandsworth over the next 15 years as the borough seeks to meet a pressing need for new housing and recover from the economic effects of the global pandemic.
- The draft plan identifies indicative parameters of heights across the borough, effectively introducing maximum building caps. For Ingate Place, this set at 6 storeys; for Lombard Road, this is between 7-10 storeys.
- Overall, we have concerns that these height caps will effectively block development coming forward that is able to deliver the wider strategic objectives of the local plan. Furthermore, these parameters do not appear to be underpinned by sound evidence base, nor reflect the existing townscape context of their respective areas. Therefore it is considered that this plan is not justified.
- Moreover, married with stringent site allocation on Ingate Place, the proposed policy framework will effectively curtail any policy compliant redevelopment coming forward, thereby making development proposals unable to deliver the wider ambitions of the Battersea Design and Tech Quarter ('BDTQ'). This is supported through a viability exercised undertaken by Savills Viability.
- As currently drafted, the plan risks rendering the redevelopment of both Ingate Place and Lombard Road sites as unviable, meaning it would also risk achieving wider objectives of its plan through a strong local economy at Ingate Place and the delivery of houses at Lombard Road. Therefore, it is not considered effective.
- As drafted, it is our contention that the Reg.19 Plan could not be considered 'sound' in accordance with Paragraph 35 of the National Planning Policy Framework (NPPF) given it is not, as a whole, positively prepared, justified, effective or consistent with national policy.

National Policy Context

Paragraph 35 of the National Planning Policy Framework ('NPPF', July 2021) states that for an emerging Local Plan to be found "sound", it must satisfy the below four criteria:

- 1 **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;
- 1 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 1 **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
- 1 **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

Further to the four tests above, local plans in London are also required to be in "general conformity" with the

London Plan.

Context

Safestore PLC

Safestore provides self-storage solutions to businesses and the public. Self-storage is an increasingly popular and important service which complements modern living and business needs. Nationally, just over half of Safestore's space is occupied by residential customers with the remainder occupied by businesses.

The businesses which use Safestore tend to be small and medium-sized and are attracted by the all-inclusive and flexible terms. These terms make the product an affordable and desirable option compared to traditional warehousing. Businesses can increase or decrease unit size at short notice without charge and can exit the facility with less than one months' notice.

To fully understand how Safestore sites support small and independent businesses, Savills Economics has surveyed how Safestore's business customers use their storage facilities and the economic benefits associated with this. The results show that Safestore self-storage units perform an important function for micro and small- medium sized enterprises.

It is therefore apparent that many existing businesses within LBW rely on Safestore as a viable and cost- effective place from which to operate and/or use for storage as an essential component of each business and their operations. Safestore wish to grow and make their businesses more efficient within the LBW through the redevelopment of both sites.

Safestore's operational requirements mean that the Safestore business will remain a critical component of the future of both sites. Therefore, Savills make representations to LBW with good faith that the local business and residential population will benefit should these comments be taken into consideration

Conclusion

Safestore is committed to working with the Council to optimise the development potential of both Ingate Place and Lombard Road. Safestore is willing and capable of delivering against the strategic objectives of this Draft Local Plan. However, there are elements of the Regulation 19 Plan which would effectively curtail the ability of Safestore to deliver growth and an enhanced environment to the borough.

As currently drafted, **we do not consider the plan to be sound as it is not effective, justified or consistent with national policy.**

We look forward to continuing to work with the borough to deliver growth in Wandsworth and thank you for the opportunity to engage in this consultation. We would be grateful for confirmation of receipt of these representations and trust that these comments will be taken into consideration as officers finalise a submission version of the Local Plan.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Charities Property Fund
Consultee Organisation Details	
Agent Full Name	Mr Tim Price
Agent Organisation Details	savills
Comment ID	248
Title	Area Strategy for Riverside
Number	11
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Area Strategy for Wandsworth's Riverside Area</i></p> <p>As set out above, the Site is identified to form part of Wandsworth's Riverside Area within the Publication Draft Local Plan and the strategy for this area is set out at Section 11 of the document.</p> <p>Paragraphs 11.3 and 11.4 of the Publication Draft Local Plan establish that whilst the Council has been successful in leveraging and encouraging investment through designating particular stretches of the riverside as Focal Points of Activity, there remain sections with unrealised placemaking potential.</p> <p>In particular, paragraph 11.4 identifies the stretch, focused on Lombard Road/York Road, as an area where regeneration is an ongoing process – with some sites recently completed, underway or planned for, and others yet to be redeveloped. This paragraph further surmises that the concentration of riverside Site Allocations within this location (including RIV10) presents an opportunity for further change with specific reference made to transformation through residential-led mixed-use development with the scope for some tall buildings.</p> <p>Paragraph 11.4 also indicates that as in other Focal Points of Activity the allocations within Wandsworth's Riverside should seek to create activity and vibrancy on the ground-floor, with restaurants, cafes, bars and cultural spaces. Notwithstanding this, it is also noted that the scale of such uses should be limited to serving local needs only such that they do not compete with the Borough's town and local centres. This is understood to outline the position for consideration of any commercial uses to be brought forward as part of any residential led mixed use development scheme at Allocation RIV10.</p>

In terms of existing context, paragraph 11.14 of the Publication Draft Local Plan states that the riverside north of Wandsworth Town is characterised by a mixture of tall residential buildings. Paragraph 11.15 subsequently states that further to the east Battersea Riverside is generally characterised by a coarse urban grain with limited tree cover and large scale buildings. It follows that the Publication Draft Local Plan acknowledged the prevalence of existing taller buildings within the immediate vicinity of the Site.

The Vision for Wandsworth's Riverside as set out at paragraph 11.18 of the Publication Draft Local Plan includes reference to the Council's intention to promote residential-led redevelopment to provide new housing, with a mix of small-scale commercial uses in Focal Points of Activity to bring vibrancy to these areas and meet the needs of local residents.

Draft Policy PM9 of the Publication Draft Local Plan is subsequently informed by the existing context and vision as summarised above. Point 2 of this Policy establishes a series of criteria which Site Allocations within Wandsworth's Riverside should seek to meet. Specifically, criteria a. stipulates that allocations should create a positive front to the water whilst criteria d. encourages the preservation of linear views along the river.

In this regard, it is noted that Site Allocation RIV10 is not referenced as being required to meet the criteria set out at Point 2 of Draft Policy PM9 despite it forming part of the Area Strategy for Wandsworth's Riverside. This is of course due to the fact that it does not include a river frontage, being located on York Road and set back from the river by circa 120m.

This underlines the fact that whilst forming part of the Area Strategy for Wandsworth's Riverside, Site Allocation RIV10 exhibits entirely different characteristics to those other allocations (RIV1-9) which do have a river frontage and thus needs to be considered on an individual basis. Such consideration would necessarily be informed by the fact the Site is located on a primary route from Wandsworth Roundabout towards Battersea Park (and onward into Central London) and with reference to its existing and future context which includes heights of up to 24 storeys.

We provide our detailed comments to support our objection to Draft Site Allocation RIV10 as currently worded and the evidence base which has informed this below.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	249
Title	NE7 Ingate Place, SW8
Number	Statement 31

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Ingate Place</p> <p>Ingate Place is currently home to a B8 self-storage facility and an Class E SME business centre. The site is not intensively used and we consider that the existing warehouse building falls short of its potential to create place. Particularly given its public transport accessibility and proximity to Queenstown Road station.</p> <p>Despite being allocated as Strategic Industrial Land (SIL), the site only contributes 4.8% (2ha) of the total 41ha Queenstown Road SIL designation and is not a contributor towards the effectiveness of London's strategic industrial capacity. The Site is extremely isolated from the surrounding strategic industrial functions, being surrounded by railway lines and physically separated from the surrounding SIL, making the area distinct from the surrounding reservoir of industrial use. Safestore Ingate Place primarily serves a number of local business and domestic functions only. It is our view that as currently drafted, the draft local plan is not accurate in its assessment that Ingate Place functions as a Strategic Industrial Location (SIL).</p> <p>Nonetheless, the site is a highly successful element of Safestore's estate and the B8 storage and distribution centre has the potential to be more intensively used should the right policy framework permit it. This ambition wholly aligns with the NPPF and we consider the LBW Local Plan presents an exciting opportunity for Safestore and the Council to work collaboratively to deliver against this vision of Ingate Place.</p> <p>Ingate Place is allocated within the draft Local Plan as site NE7 'Battersea Design And Technology Quarter'. The allocation is for: <i>'a mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space'</i>.</p> <p>The site also lies within the Battersea Design And Technology Quarter ('BDTQ'), of which We-Made-That have drafted the Battersea Design And Technology Quarter Masterplan ('BDTQM'), which has the intention of informing development proposals in this area. In lieu of any formal consultation process, Savills have written to both We-Made-That and LBW regarding the draft BDTQM. Via our letter dated 29th June 2020, we have expressed Safestore's significant concern with regards to the lack of consultation on the BDTQM, which has now gone on to form an extensive length to inform the spatial policy of this plan.</p> <p>At the time of writing, Safestore are also engaging with PRD regarding a review of the WeMadeThat document, and look forward to engaging in a collaborative process.</p> <p>We therefore suggest there is further scope within LBW policy to engage with Safestore regarding the BDTQM and create a positive framework, able to capture the potential of the area.</p> <p><i>Site allocations – Policy NE7, Battersea Design and Tech Quarter</i></p> <p>Map 5.4 outlines the wider spatial area map of the BDTQ. This is included below, for your reference:</p> <p>As a key landowner within Site 12, Safestore raise concerns regarding the deliverability of the Site allocation as currently drafted and would suggest that LBW consider the ambitions of Safestore and the operational requirements of the existing self-storage unit.</p> <p>Map 5.4 currently proposes a potential underpass underneath the railway arch to the north-east of the Site. Safestore would ask whether a sound feasibility and viability assessment has been carried out by LBW for this railway arch, considering the substantial cost and operational implications of such construction on the railway network. Delivering such a route within any</p>

development proposal would not be viable or an attractive proposition for Safestore, considering the substantial benefit of the site being secure, and we suggest this is removed from the Spatial Area Map prior to adoption to ensure the proposals are indeed deliverable.

Map 5.4 also proposes 'other open space' where the operating Safestore unit is located. The provision of open space in any development proposal on Ingate Place is also reiterated in paragraph 5.71 of Ingate Place's site allocation, which outlines proposals should '*provide open space with high-quality green features in the centre of Ingate Place (NE7)*'. Safestore would question the introduction of the open space designation. This type of open space is not suitable for working sites. Additionally, Safestore occupiers value the ability to park vehicles on site so they can service their customers. This masterplan approach should be brought forward having had significant consultation undertaken with landowners prior to adoption, and we would encourage further engagement to ensure that the proposals sought by the LBW aligns with the aspirations of stakeholders around Ingate Place.

Paragraph 5.79 of site allocation NE7 outlines that the maximum appropriate height for the area is 6 storeys, in accordance with the mid-rise building maps in Appendix 2. It also notes that development proposals for tall buildings within NE7 will not be supported. As noted, capping building heights within Ingate Place has the potential to sterilise any viable redevelopment opportunity of the Site, thereby preventing the delivery of the strategic aims of the BDTQM. This is discussed in further detail later within this note.

We consider that the current site allocation is unduly prescriptive, inflexible and restrictive, constraining any future redevelopment opportunities of Ingate Place and the ability of development proposals to deliver significant planning benefits that the draft Plan seeks to achieve. As currently drafted, the framework is not in general conformity with the national policy, specifically paragraph 11 of the NPPF, which seeks to ensure plan policy is sufficiently flexible. We would strongly encourage LBW to engage with landowners around Ingate Place to deliver a site allocation that has the potential to be delivered and meet the draft local plan's wider strategic ambitions of growth.

Ingate Place

In order to maximise the site through a mix of commercial uses, Savills Viability have assumed the redevelopment to comprise:

- The refurbishment of the factory building and conversion to higher value use as offices
- Retention of the modern storage annex,
- Holistic redevelopment of the Business Centre to provide enhanced modern specification industrial use, and
- Erection of two new storage buildings within the developable envelope permitted under the draft tall buildings policy.

The Storage Centre provides a total of 126,695 sq ft of accommodation over five storeys plus basement, alongside a modern extension providing an additional 21,829 sq ft over four storeys. The hypothetical scheme at Ingate Place is set out below:

Description

Use

Area GIA

Sq m (Sq ft)

Area NSA/NIA

Sq m (Sq ft)

Building A

Offices

2,200 (23,681)

1,650 (17,761)

Building B

Offices

2,200 (23,681)

1,650 (17,761)

Building C
 Offices
 2,200 (23,681)
 1,650 (17,761)
 Building D
 Industrial/workspace
 7,968 (85,768)
 -
 Building E
 Storage
 2,700 (56,705)
 -
 Building F
 Storage
 2,156 (23,207)
 -
 Building G
 Offices
 13,798 (148,521)
 9,659 (103,965)
 Total
 33,222 (357,601)
 -

The plans for each option are provided within the attached feasibility studies. Importantly, each option has been developed to accord with the provisions of the draft Local Plan in regards to land use and height.

Savills Viability has undertaken a valuation at the Site to assist in forming the baseline of the viability assessment and have concluded that the RLV is £14,900,000 million (m).

RLV
SVB
Status
Local Plan
Site Specific

£15,800,000

£22,700,000

	<p>£35,100,000</p> <p>Unviable</p> <p>Our assessment of Ingate Place concludes that the Residual Land Value based upon an optimised commercial- led development falls significantly below both the site specific and borough wide Site Value Benchmark and would therefore be considered unviable in planning.</p> <p>The Site being subject to the 6-storey height cap therefore renders the draft plan, when read as a whole, undeliverable and not effective.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Map 5.4 identifies a new underpass route that the Council consider desirable in order to reduce the severance caused by the railway lines, however any proposals would be subject to feasibility assessment.</p> <p>Map 5.4. illustrates existing green space which is in the form of several large trees on the site currently. Any major development would need to improve on the existing open space on site.</p> <p>The approach to building height in this area is considered sound. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'Transform' area as per the characterisation assessment of the UDS. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p> <p>The Council's position on the suitability of the area's designation as SIL are set out against comment #254.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	250
Title	RIV8 19 Lombard Road, 80 Gwynne Road, SW11
Number	Statement 63

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Lombard Road</p> <p>Safestore has been trading from Lombard Road since July 2002The Site is currently home to 11,421 sqft of B8 storage and distribution floorspace.</p> <p>The Site neighbours Fraser & Ellis, a plumbers merchant. These two sites are allocated within the emerging local plan for development incorporating replacement economic floorspace and residential use under site allocation: 'RIV8 19 Lombard Road, 80 Gwynne Road'. The site also lies within the wider Lombard Road/ York Road Riverside Focal Point.</p> <p>The two landowners have historically sought pre-application advice regarding the comprehensive redevelopment of the two sites, the most recent being a part 22, part 18 storey development, stepping down from the nearby 28 storey Lombard Wharf.</p> <p>Safestore remains committed to exploring the redevelopment opportunities at 19 Lombard Road and 80 Gwynne Road. The Site presents an opportunity to deliver a high quality mixed-use scheme, creating a significant amount of homes and employment floorspace. As currently drafted, the policy seeks to introduce a maximum building height of part 7/10 storeys across this Site, which would effectively curtail any viable redevelopment opportunity.</p> <p>We consider the height cap placed on this Site will sterilise the future redevelopment opportunities of both Lombard Road and Ingate Place. This is explored in more detail within this note.</p> <p>Lombard road</p> <p>For the site at Lombard Road, it is assumed that the site is brought forward jointly with 80-100 Gwynne Road (collectively '19 Lombard Road & 80-100 Gwynne Road'), in accordance with the relevant site specific allocation (ref RIV8) which proposed residential led mixed use development with reprovision of the light industrial use currently enjoyed. For the residential element, Savills Viability have assumed an affordable housing provision equivalent to 35% on a mixed tenure basis which is consistent with the Local Plan Viability Study. The hypothetical scheme at Lombard Road is set out below:</p> <p>Use</p> <p>Area GIA</p> <p>Sq m (Sq ft)</p> <p>Area NSA/NIA</p> <p>Sq m (Sq ft)</p> <p>Residential</p> <p>6,503 (69,996)</p> <p>4,624 (49,777)</p> <p>Industrial / Storage</p>

5,702 (61,376)
 -
 Plant
 192 (2,069)
 -
 Basement
 2,412 (25,963)
 -
Total
14,809 (159,404)
 -

The plans for each option are provided within attached feasibility studies. Importantly, each option has been developed to accord with the provisions of the draft Local Plan in regards to land use and height.

Savills Viability has undertaken a valuation at the Site to assist in forming the baseline of the viability assessment and have concluded that the RLV is £3,400,000 million (m).

RLV
SVB
Status
Local Plan
Site Specific

£3,400,000

£4,800,000

£12,880,000

Unviable

Our assessment of Lombard Road concludes that the Residual Land Value based upon an optimised residential-led mixed use development falls significantly below the site specific Site Value Benchmark and would therefore be considered unviable in planning. Even where the borough wide Site Value Benchmark is technically unviable in planning albeit to a reduced margin.

The Site being subject to the 6-storey height cap therefore renders the draft plan, when read as a whole, undeliverable and **not effective**.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The tall and mid-rise building zones are based on the outcome of the UDS which set out design principles and recommendations indicating where in the borough tall building development is likely to be appropriate and opportunities for guiding and enhancing design qualities in these areas. Viability does not form part of the methodology of the UDS as it is a design-led process. Development proposals exceeding the appropriate height will not be supported on design grounds. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	251
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Regulation 18 Draft Local Plan</p> <p>The LBW undertook its Regulation 18 consultation of the draft plan (Reg.18 Plan) in early 2021. Within the Reg 18 Plan, Ingate Place was located in an area which has opportunities for tall buildings within a local context, and the height at which buildings will be considered as 'tall' was proposed as 8 storeys.</p> <p>Lombard Road was also located in an area which has opportunities for tall buildings within a local context, and the height at which buildings will be considered as 'tall' is 5 storeys.</p> <p>This is illustrated in the image below. For clarity, the key in the image outlines the following:</p> <ul style="list-style-type: none"> • Burgundy – Opportunities for tall building clusters and/or landmarks • Deep orange – Opportunities for tall buildings within town centres and along strategic routes • Pale orange – Opportunities for tall buildings within a local context <p>Since the publication of the Reg.18 Plan we do not consider there to have been any change on or near the Site which would materially change site conditions in environmental or townscape regard. Further, we note that the neither the draft Reg 19 plan or its supporting evidence base points to any chance in circumstances in this regard.</p> <p>The remainder of this note outlines our comments on the draft regulation 19 version of the local plan. It should be noted that where policies are not discussed directly in this note, Safestore is in broad support of the content.</p> <p><i>Policy LP4 – Tall and Mid-rise Buildings (Ingate Place and Lombard Road)</i></p>

This draft policy establishes tall and mid-rise building zones across the borough; with 'mid-rise' defined as 6- storeys or 18m (whichever is the lower) at Ingate Place and taller buildings defined as 7-storeys or 21m (whichever is the lower) at Lombard Road. We consider this rigid approach to tall buildings to be inflexible and an inappropriate strategy for the borough to be able to encourage and deliver appropriately optimised sites. Optimising sustainable brownfield sites is a strategy that is reiterated in both Policy D3 (Optimising site capacity through the design-led approach) of the London Plan and the National Planning Policy Framework.⁴ By restricting the appropriate optimisation it is our view that the policy as drafted is too rigid and discourages development, thereby making the policy not deliverable and **not effective**.

Ingate Place

Ingate Place was included within an area with opportunity for tall buildings within a local context within the Regulation.¹⁸ Draft Local Plan, which was underpinned by the Arup Urban Design Study (2021). Ingate Place was also classed as area with low sensitivity to taller buildings (see image below).

There is no justification for the borough's change in approach to this site, by removing the site from the tall building zone and placing it into the mid-rise building zone. Appendix A of the Urban Design Study (2021) provides high level townscape, visual and heritage assessment for various tall building zones. This includes detailed massing models for many of the tall building areas, to assist in justifying an area's respective designation. However, it is noted that the mid-rise building zone the Site is located within (i.e., MB-B3a-02) has no such assessment and it is therefore unclear what evidence the Urban Design Study (2021) has utilised to justify the current mid-rise designation of the site.

Also, Ingate Place has notably been excluded from the Taller Building zone adjacent to the Site. Montague Evans found that there is no evidence to suggest that the tall building zone could not be extended to include the full extent of Ingate Place and indeed this would enable greater flexibility to introduce a varied composition of massing and heights as suggested by We Made That in their BDTQ Framework document.

The accompanying note from Montagu Evans also raises issue with the lack of analysis given to the local context. The designation of only the western portion of Ingate Place as a tall building zone is unduly restrictive and does not align with the scenario's baseline assessment and conclusions. Considering this, in the absence of any townscape assessment of a tall building at the site it is our view that Policy LP4 is **not justified**.

Lombard Road

With regards to Lombard Road, the tall building allocation of 7-20 storeys is subjective. The site presents an opportunity to deliver significant benefits through the delivery of homes, jobs and public realm improvements which can only be facilitated through the delivery of a taller building on site.

The accompanying Urban Design Study (2021) outlines that heights in this area are to be capped to ensure there is no detrimental impact on the adjacent York Gardens and Battersea Square Conservation Area.

However, the extent of visibility of new and existing development on the setting of a conservation area does not necessarily constitute harm and the degree of any harm for each individual case is rightly assessed on its own merits. Indeed, there are many instances of where tall or large-scale development appear as prominent features in the wider context of conservation area settings and this does not necessarily result in a negative impact, there may be resulting positive aspects of townscape such as juxtaposition of new and old, legibility and wayfinding and composition of tall building clusters.

It also fails to consider that Lombard Wharf is visible, most notably from the western edge of the Battersea Square conservation area as a standalone building with a modern architecture that contrasts with the low-rise historic character. The 14-storey Gwynne Road development is also visible as an isolated feature. Each building therefore forms part of the conservation area's setting and the introduction of additional building forms of a similar or comparable scale to respond to these standalone buildings may be beneficial in creating an improved composition of taller elements forming the backdrop in views looking southwards towards an emerging riverside cluster.

The accompanying letter compiled by Montagu Even outlines that the Study fails to account for how new development can contribute positively to defining a future character of place. To demonstrate this point, Collado Collins have drawn up a policy compliant scheme at the same scale described in the Study's scenario for Lombard Road. The indicative townscape views show how placing a height restriction on the site would create an awkward and unsuccessful townscape composition that would fail to meet the policy requirements of London Plan (2021) policies D1 (responding to established and emerging context) and D3 (design-led site optimisation).

Notably, this scheme would also fail to deliver substantial planning benefits that a taller building could. In the absence of any townscape assessment of a tall building at the site it is our view that Policy LP4 is **not justified** in its parameters of acceptable heights at Lombard Road

LP4 - Tall and Mid-rise Buildings - (Ingate Place and Lombard Road)

Draft Policy LP4 (Part C) states proposals for tall buildings will not be permitted outside the identified tall building zones. The apparent blanket-ban on tall buildings outside of tall buildings zones does not align with the recent *Master Brewer (2021)* judgment of the High Court. In summary, the court held that a tall building proposal should be assessed against the potential impacts outlined in Policy D9 (Part C) of the London Plan (2021) rather than assessing the impacts in a vacuum.⁵ Whilst London Plan Policy D9 allows local planning authorities to be more prescriptive with tall building locations it is clear from the Master Brewer judgment that an assessment of a scheme holistically should be considered. As currently drafted, Policy LP4 (Part C) strictly prohibits tall buildings outside of tall building zones and removes an applicant's ability to appropriately provide.

a planning justification for a scheme. It is therefore our view that Policy LP4 (Part C) is **not in general conformity with the London Plan, nor is it effective.**

LP4 (Part 3) states proposals should be designed to reflect and respond to relevant key view corridors toward the Site to ensure location, form, detailing and prominence of tall buildings are appropriate within the wider context. We are generally supportive of this insofar as it seems to support the iterative design process and encourages applicants to engage in the design-led process.

LP4 (Part 4) states the design of the lower, middle and upper parts of tall buildings should result in the creation of a visually coherent scheme both in terms of the building itself and how it relates to the surrounding area, and its appearance in any mid or long-range views. Both Ingate Place and Lombard Road present a clear opportunity to deliver a legible and visually coherent scheme which acts as a distinct markers of entry into the BDTQ and edge of the tall build zone respectively. In this context, we consider the Site capable of accommodating buildings taller than 6 and 7 storeys respectfully in these locations.

LP4 (Part 16) states tall building proposals should incorporate active frontages at ground floor. We are supportive of LBW's approach to active ground floor uses.

Much of the tall building "impacts" to be assessed under Policy LP4 concern design. In this design context, development proposals should be tested through the development management process following submission of a detailed planning application. Further, subject to the appropriate townscape and design testing, we contend that both Ingate Place and Lombard Road are capable of accommodating a building taller than the heights identified as "tall" in the neighbouring tall building zone

In light of the above, it is our view that Ingate Place and Lombard Road have been wrongly capped at heights of 6 and 7 storeys respectively. The Urban Design Study (2020) presents no clear, townscape or design evidence of the Site in which to justify either designation; this is particularly pertinent considering both Sites were included within an opportunity area for tall buildings within a local context.

For the reasons set out above, we consider this policy as drafted is **not justified**. The strict interpretation of the London Plan's tall building policy D9 is likely to discourage development and unduly restrict LBW's ability to deliver the wider objectives of Policy LP4. The policy as drafted is also therefore **not effective**.

Overall effects of the draft Plan

As outlined above, Safestore have significant concerns with regards to the 'soundness' of the draft plan. In particular we consider that the details of the plan with regards to building heights results in such an overdue constraint as to render the site undeliverable during the plan period. The effect of which would be to sterilise the Sites and ensure that it does not deliver the homes, jobs and public realm sought by other elements of the plan.

Savills Viability have considered the subject sites within a 'viability in planning context', comparing a Site Value Benchmark (SVB) - (otherwise known as 'Benchmark Land Value (BLV)', to the Residual Land Value of a hypothetical scheme. Where the Residual Land Value is lower and/or not sufficiently higher than the Site Value Benchmark the project is not considered technically viable in planning and would unlikely be brought forward as a result.

In order to assess the impact of the Council's draft tall buildings policy on the subject sites we have considered the viability of a policy compliant and optimized scheme on each of the subject sites, reflecting informed by design work carried out by Collado Collins. Each scenario is considered with the assumption of the draft tall building policy having been adopted therefore setting a height restricted parameter for the developable envelope. We would note that the scenarios included within this assessment are intended for illustrative use only and do not necessarily represent a formal view on height, massing or density.

Given the intended purpose of this exercise which seeks to respond to the emerging Local Plan, Savills Viability have sought to rely upon the assumptions made within the Three Dragons Local Plan Viability Study dated 2022. Savills Viability have however diverged from the Viability Study assumption base where respective assumptions are considered unrealistic for the nature of hypothetical development included within our assessments.

- 3 Paragraph 199 of the National Planning Policy Framework
- 4 Paragraph 130 (e) of the National Planning Policy Framework
- 5 Paragraph 85 of Hillingdon judgment (<https://www.bailii.org/ew/cases/EWHC/Admin/2021/3387.html>)

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.

Following the publication of the London Plan (post Reg 18 consultation), the Regulation 18 consultation comments and the advice of the GLA and Historic England, the council produced an updated UDS which allowed for the consideration of setting maximum heights for locations acceptable for Tall Buildings. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.

The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.

The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The

	<p>approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.</p> <p>The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>Regarding the Master Brewer judicial review Case, the Council considers that this should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	252
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy SDS1 – Spatial Development Strategy 2023-2038</i></p> <p>The draft policy proposes a housing target of 1,950 new homes annually until 2028/29, which aligns with LBW's housing target identified in the London Plan. However, the Council's own Local Housing Need Assessment (2020), published as part of the local plan evidence base, outlines that LBW Objectively Assessed Need ('OAN') is 2,537 dwellings per annum. 1</p> <p>Whilst aligning the housing target in the draft plan with the London Plan ensures its general conformity, it also fails to consider Robert Jenrick's (the then Secretary of State for the Ministry of Housing, Communities and Local Government) letter to the Mayor requiring the now adopted London Plan's housing targets be immediately reviewed following its adoption.² As such, given that LBW has objectively identified itself a greater need for housing the plan would fail to deliver against this basic requirement. We suggest that a positively prepared plan would meet its own identified needs rather than adopting an out-of-date position informed by an out-of-date evidence base from the London Plan.</p> <p>Therefore, we consider that there is a discrepancy between the evidence base housing target and the housing target identified in draft policy, meaning this policy was not positively prepared and would not be effective in delivering the needs of the borough and is therefore not justified.</p> <p>1 Paragraph 6.32 of Local Housing Needs Assessment</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The Objectively Assessed Need figure is an unconstrained figure based on the Standard Methodology i.e. it does not take account of land supply, availability of developable land, other constraints such as designated parks and open spaces and the character of an area.</p> <p>Therefore, on the supply side, the GLA/Mayor of London has carried out a London-wide "Strategic Housing Land Availability Assessment" (SHLAA) as well as a London-wide Strategic Housing Market Assessment (SHMA). The SHMA identifies the (unconstrained) need for additional homes per annum (i.e. 66,000 across the capital). The purpose of the SHLAA on the other hand is to identify supply to meet future housing need, as well as being consistent with the policies set out in the overall NPPF. The SHLAA methodology takes account of the distinct circumstances in each of the boroughs, including the limited stock of land and the uniquely pressurised land market as well as dependence on recycling brownfield land currently in existing uses. The SHLAA methodology has been developed and refined over time, and Wandsworth Council officers have worked very closely in partnership with the GLA to assess potential sites and constraints. The London Plan has a 10-year target of 19,500 or 1,950 dwellings per annum for Wandsworth. For this reason, an authority's housing target is not the same as the objectively assessed need because the need figure doesn't take into account the area's deliverable and sustainable supply capacity, defined with reference to constraints set out in the NPPF.</p> <p>The housing requirement figure of 20,311 is based on the London Plan requirement for Wandsworth to 2028/2029 and a combination of the small sites target and SHLAA sites, which reflects the Plan's suggested approach to meeting housing need beyond 2029.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	253
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Site Allocation - Policy PM3, Nine Elms (Ingate Place)</i>

We are pleased to see that LBW recognises the potential of Nine Elms as an area able to achieve substantial growth and competitiveness. We believe that there is an ongoing appetite for redevelopment around Nine Elms catalysed by the introduction of Apple at the Battersea Power Station. The plan has recognised this and we support this in principle

The draft plan distinguishes the BDTQM as an area with the potential to agglomerate small and medium-sized enterprises. Married with its location within the Nine Elms Opportunity area, we are pleased to see that the potential for growth around Ingate Place has been recognised.

However, any emerging strategic and/or non-strategic spatial-based policy must acknowledge and reflect the ambition of landowners around the site to deliver this untapped growth, in order to create a policy framework that is capable of achieving the strategic aims of the plan. As currently drafted, Policy PM3 is overly prescriptive, not responding to the temporal market context for development, which is constantly evolving. The overly prescriptive spatial strategy across Ingate Place, married with the introduction of acceptable height parameters (respectively explored later within this note), has the potential to curtail viable development opportunities. The redevelopment of Ingate Place has been effectively paused because of the uncertainties around the BDTQM. This uncertainty could effectively compound with the introduction of further policy constraints.

The 2019 BDTQM document, completed by 'We Made That', has had a significant role in draft policy PM3. However, to date there has been no formal public consultation process inviting landowners to provide comments on this document. Any SPD would need a statutory 4-6 weeks of public consultation and due alterations before adoption. Therefore, significant weight cannot be placed upon the BDTQM in the draft Local Plan before this process has been undertaken. The draft Local Plan should not go through public consultation while incorporating the spatial-based policy of the BDTQM, that is yet to go through the necessary adoption processes. This is supported by the accompanying letter from Shoosmiths LLP. The weight given to the BDTQM within the draft local plan without the necessary due consultation is therefore **unsound**.

With regard to the prescriptive nature of the local plan, point A(1) of policy PM3 outlines the need for proposals to deliver place-making through public realm improvements. Safestore recognise the importance of delivering

a betterment in public realm through development. However, as a business Safestore place huge value on the

Site as a self-contained, secure unit. Having an increased footfall through the site would be problematic to the operations of the Safestore. We consider it to be impractical and overly prescriptive to suggest that all development proposals within the BDTQ should deliver and/or fund placemaking improvements, such as amenity yards, public realm in tunnels and underpasses, walking and cycling access. Later on in the plan, draft Policy LP20 (New Open Space) sets out that financial contributions can be placed by developers to enhance public opens space where it can be demonstrated that on-site provision is not feasible. This flexibility should be applied to point A(1), as the current requirement for public realm improvements to be delivered on private land is overly onerous.

Point 3 of policy PM3 outlines that development proposals for tall or mid-rise buildings in Nine Elms will only be supported in zones identified in Appendix 2. Any proposal for a tall or mid-rise building will need to address the requirements of Policy LP4 (Tall and Mid-rise Buildings) as well as other policies in the Plan as applicable. The height parameters of Ingate Place is explored in further detail later in this note, but introducing policy that only permits mid-rise buildings of 6 storeys will effectively block the redevelopment of Ingate Place being able to deliver substantial planning benefits and positive growth.

2 Page 1 of Letter to Mayor of London from Secretary of State for Housing, Communities and Local Government (27 July 2018)

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

As set out in response to the representation submitted on behalf of Safestore PLC as part of the consultation on the Pre-Publication version of the Local Plan, the Battersea Design and Technology Quarter Economic Appraisal and Development Framework (BDTQ EADF) was commissioned to help the Council to understand how such a concept could be defined, mobilised and delivered in the area. The document has been endorsed by the Council, and it is considered appropriate that this evidence should therefore inform the Council's spatial policy. It is

noted that a consultation exercise, led by We Made That (authors of the study) and assisted by Council officers, was undertaken to inform that document in which a number of landowners participated - however, against the intentions of both the Council and Safestore PLC, the latter were not involved. The Council have subsequently engaged with Safestore PLC on this matter and would continue to welcome further discussion to identify an appropriate strategy for this site in Ingate Place which is agreeable to both parties.

The BDTQ EADF is not a supplementary planning document (SPD) and has therefore not been subject to any of the formal consultation processes associated with the making of SPDs. The approach it has informed (in particular within the Site Allocation) in the Local Plan is subject to both previous and this consultation, affording opportunity for comment. It is noted that in response to previous representations submitted by Safestore PLC, the Council amended Policy PM3 Nine Elms to reduce the emphasis placed on the study within the Local Plan. That notwithstanding, the Council consider that further revisions could be made against other parts of the Local Plan to ensure a consistency of approach with regards to the BDTQ EADF.

PM3(A)1 sets out that developments should deliver a network of open spaces, however, where it can be shown that it would not be feasible, as set out in LP20 New Open Space a financial contribution could be provided in lieu.

The height parameters and tall and mid-rise zones have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA).

The approach to tall and mid-rise building heights and zones, including the approach of not permitting proposals for tall or mid-rise building outside of these zones, is considered to be consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.

Proposed Change	<p>Amend paragraph 5.70 as follows:</p> <p>“Uses – Industrial uses must be provided within ground floor units, unless specified within the BDTQ EADF document (e.g. hub sites), with the opportunity for industrial and office uses on upper floors. Existing...”</p> <p>Amend paragraph 5.76 as follows:</p> <p>“A high-quality public realm is required in accordance with the Nine Elms Public Realm Design Guide and the BDTQ EADF.”</p> <p>Amend paragraph 18.35 as follows:</p> <p>“...All proposals should be consistent with the Area Strategy for Nine Elms and associated Site Allocations, and be informed by the BDTQ EADF. It is identified in the ELPS that...”</p>
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	254
Title	Paragraph

Number	5.70
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Ingate Place - Strategic Industrial Land</i></p> <p>Ingate Place is designated as Strategic Industrial Land, as outlined in paragraph 5.70 of policy PM3. Within SIL, development is limited to industrial and related capacity uses, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions. The implications of Ingate Place's SIL designation is expanded on in more detail in Policy 34.</p> <p>Paragraph 18.26 of the draft Local Plan outlines that Strategic Industrial Land (SIL) is defined within London Plan Policy E5 as <i>'forming London's main reservoir of land for industrial, logistics and related uses, and is given strategic protection because these sites are considered critical to the effective function of London's economy'</i>. However, paragraph 18.26 of the draft Local Plan fails to consider the paragraphs 6.5.1 and 6.5.2 of the London Plan, which outline that SILs <i>'can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development [...] providing relatively low-cost industrial space for SMEs and located close to the strategic road network.'</i> The characteristics listed here are not representative of the characteristics at Ingate Place.</p> <p>Therefore, the London Plan's definition of SIL attributes four main characteristics to them:</p> <ol style="list-style-type: none"> 1 Critical to the effective function of London's economy; 2 Accommodate activities which have the potential to raise tensions with other land uses; 3 Providing relatively low-cost industrial space; and 4 Located close to the strategic road network. <p>Safestore strongly object to the characterisation of Ingate Place as an area suited as SIL when considered in context of the above characteristics.</p> <p>Firstly, the site only contributes 4.8% (2ha) of the total 41ha Queenstown Road SIL designation and is not a contributor towards the effectiveness of London's economy. The Site is extremely isolated, being surrounded by railway lines, physically separated from the surrounding SIL, making the area distinct from the surrounding reservoir of industrial use. Safestore Ingate Place primarily serves a number of local business and domestic functions only. In its current context, the area is not critical to the effectiveness of London's economy.</p> <p>In relation to the second SIL characteristic, the existing activities on site do not raise any potential amenity impacts onto other land uses. Paragraph 18.30 of the draft Local Plan outlines that the <i>'nature and by-products of industrial activities, which include the generation of noise, odours, dust, emissions, traffic (including HGVs) and the requirement for operation across a 24 hour period, can often result in conflicts being raised with other uses'</i>. Safestore, Ingate Place does not portray these aforementioned characteristics. The site is principally used for self-storage purposes with an element of office and workshop space within the business centre, with no intense industrial operations on-site. Safestore facilities already co-locate alongside a variety of uses without detrimental impact around London. Ingate Place is therefore not an area that produces by-products of industrial activities, making it an appropriate area for a larger variety of land uses than just industrial.</p>

	<p>The distinctness of Ingate Place from the wider SIL is reinforced by the fact the area was designated as an Industrial Business Park (IBP) and not a Preferred Industrial Location (PIL) by the London Borough of Wandsworth in 2016 through the Employment and Industry Review. The site was designated as an IBP as the land uses on site were demonstrably different from the more industrial PIL land uses. The New London Plan does not currently recognise IBP within its SIL designation and therefore at a regional level, the site will be allocated as SIL without distinction. However, there is currently a significant amount of office use within Ingate Place that would not currently be supported as being suitable within a SIL in policy terms. Considering the quantum of office use that exists within Ingate Place, the area does not function as an area designated as SIL and should not be designated as such.</p> <p>In regard to the third characteristic, paragraphs 6.5.2 of the new London Plan (2020) outlines that SILs should provide low-cost industrial floorspace for SMEs. The site is currently occupied by high-value uses and not fit to be part of the wider Queenstown SIL designation. Due to the high value uses, the site will only be commercially viable by incorporating a variety of land-uses which contribute to the wider function of the BDTQM. Therefore, it's clear that designating the site as SIL could act as a deterrent to any redevelopment opportunities on site, which is principally against the overarching objectives of the wider BDTQM and Battersea and Nine Elms Opportunity Area.</p> <p>Lastly, paragraph 6.5.2 of the New London Plan outlines that SILs should be well-located '<i>close to the strategic road network</i>'. The Site is extremely isolated, being surrounded by railway lines, physically separated from the surrounding SIL. It also lies over a mile away from the strategic road network of the A3. The isolated nature of the site means it is not able to significantly contribute to the surrounding parcel of SIL. The removal of Ingate Place from SIL would therefore enable the site to make a greater contribution to the LBW.</p> <p>The NPPF requires that, for a local plan to be declared sound, it must be effective, meaning it must be deliverable. The allocation of the site as SIL means that the context of the site is misunderstood and it should be recognised that the likelihood of the Council achieving SIL uses on this site is extremely unlikely. As such, the plan as drafted is effectively stifling the opportunity for investment in the site ensuring that the status quo will remain until there is a change in policy context.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The Strategic Industrial Location designation is not a new designation within this Local Plan, and indeed its retention has long been planned for as part of the strategic redevelopment of the wider area – see, for example, the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (2012). In the context of the identified need for industrial floorspace within the borough (of 8.6ha, or 35,700 sqm of core industrial floorspace, the Council do not wish to lessen the protection afforded to industrial uses within this location through the re-designation of this site, and do not consider that such an approach would be justified against the requirements of the NPPF, paragraph 82.</p> <p>The LPA is cognisant of paragraphs 6.5.1 of the London Plan, however it is emphasised that SILs 'can' accommodate activities which have the potential to raise tensions with other land uses, but that not all uses will fall under this definition. Paragraph 6.5.2 states that SILs are important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs. As set out within this representation (re: the findings of Savills Economic), the Council agree that the Safestore site in Ingate Place forms part of that provision.</p> <p>That notwithstanding, as identified within the representation, the Council consider that Ingate Place (alongside Havelock Terrace and Silverthorne Road) forms a distinct part of the Queenstown Road, Battersea SIL. The designation of the area as the Battersea Design and Technology Quarter reflects this, and builds upon the designation of the area under the adopted Local Plan as an Industrial Business Park (IBP). This approach supports the provision of SME office accommodation and research and development uses on upper floors if it would result in the intensification of industrial uses on the site (see LP34.B.4.a), which reflects both existing office uses within the area, as well as the Council's desire to leverage investment in the adjacent areas.</p>
Proposed Change	No change considered necessary

Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	255
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy PM9 – Wandsworth's Riverside (Lombard Road)</i></p> <p>With regards to inclusive growth, we support the promotion of residential-led development in the Focal Points of Activity. We consider that the housing delivery targets for the borough should be increased (as discussed against draft policy SDS1 above) which would likely result in an increase for delivery in the Wandsworth Riverside area.</p> <p>The 'People First' element of the policy is also supported. Safestore recognise the importance of delivering a high-quality streetscape and increasing public access to the riverside. Lombard Road is capable of contributing to a number of these objectives of the draft plan where the right policy conditions allow for the site to be delivered and optimised for its re-development potential.</p> <p>However, when married with the taller building policy part PM9 (4), in which it is outlined that development proposals for tall or mid-rise buildings in Wandsworth's Riverside will only be supported in zones identified in Appendix 2, we raise concerns that the overall deliver of benefits will be undeliverable considering the prescriptive height policy.</p> <p>The townscape context of Lombard Road is considered on later in this note and within the accompanying report compiled by Montagu Evans.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. Please see separate responses to individual points against the relevant policies.
Proposed Change	No change considered necessary.

Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	256
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP1 – The Design Led Approach (Ingate Place and Lombard Road)</i></p> <p>Draft policy LP1 requires development proposals to, among other things, use a design-led approach to optimise the potential of sites, in conformity with the approach set out in Policy D3 of the London Plan (2021).</p> <p>Whilst Safestore is fully supportive of the LBW's intention to optimise site's utilising the design-led approach as set out, we consider this approach to be at odds with draft Policy LP4 (Tall and Mid-rise Buildings). The detail of draft Policy LP4 is discussed in detail below. However, a design led approach as set out in these draft 12 criteria of Policy LP1 allows for flexibility and for an Applicant and the Borough to engage in discussion through the relevant Development Management procedures. This approach ensures that any development proposals submitted to the Borough would need to respond to this policy whilst demonstrating that the site has been optimised to deliver best outcomes for the borough. A rigid approach which caps heights removes this design approach from the process and is unlikely to therefore deliver the jobs and homes the borough needs as well as resulting in inferior design proposals.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry</p>

	<p>guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Policy LP4 defines tall buildings and tall building zones, and is based on a rigorous assessment of Wandsworth's built form and varying characteristics. It concludes with firm recommendations for the development of the skyline based on this assessment. PolicyLP1 takes an approach that seeks to respond to, and balance, development needs and site context / characteristics. Height parameters are considered to form one part of the consideration of the design-led approach.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	257
Title	LP3 Historic Environment
Number	Policy 14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP3 – Historic Environment (Ingate Place and Lombard Road)</i></p> <p>Part 3 of this draft policy requires development proposals to positively contribute to and, whenever possible, enhance the setting and integrity of strategic and local views (as set out in the London Plan and in table 14.1) and valued. The starting point for this draft policy is to positively contribute, which appears to go over and above the position in the London Plan and the NPPF.3 The extract from London Plan policies HC1 and HC4 demonstrate that the baseline is to conserve and to not harm, as opposed to requiring a positive contribution. Whilst we are generally supportive of protecting Wandsworth's historic and strategic environments, draft policy LP3 (Part 3) appears more onerous than the London Plan and the NPPF. This policy as drafted is therefore not in general conformity with the London Plan and not consistent with national policy.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	Comment noted. The approach is considered to be sound. Paragraph 190 of the NPPF identifies that local plans set out a positive strategy for conservation of the historic environment and that this strategy should take account of the desirability of new development making a positive contribution to local distinctiveness etc.
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	258
Title	LP6 Basements and Subterranean Developments
Number	Policy 17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP6 – Basements and Subterranean Developments - (Ingate Place and Lombard Road)</i> Part A.1 of this draft policy states that new basements will only be permitted where it would result in no more than one storey of basement accommodation below ground level. However, there does not appear to be any evidence base to justify this position in the Reg.19 Plan. The acceptability of basement development should be determined on a case-by-case basis and LBW should be supportive of such development where an applicant has demonstrated a basement has been appropriately designed with appropriate mitigation measures, where necessary. This draft policy therefore appears unduly restrictive, particularly in the context that there is no evidence to underpin this position. As such, we consider the policy is not justified .
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The adopted Housing SPD provides reasoning for the limitation on multi-level basements.
Proposed Change	No changes considered necessary.

Consultee Full Name	Charities Property Fund
Consultee Organisation Details	
Agent Full Name	Mr Tim Price
Agent Organisation Details	savills
Comment ID	259
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Approach to Tall Buildings</i></p> <p>The Publication Draft Local Plan identifies that the Site is located within an area appropriate for 'tall buildings' as defined on the map at Appendix 2. Specifically, the allocation of the Site (RIV10) forms part of tall building zone TB-B2-06 where a maximum appropriate height range of 7 to 10 storeys is imposed.</p> <p>Previously, the Site had formed part of an area that was identified for 'opportunities for tall building clusters and/or landmarks' within the Pre-Publication Draft Local Plan (November 2020).</p> <p>This position was established through analysis undertaken by Arup within the December 2020 Urban Design Study which forms part of the evidence base for the emerging Wandsworth Local Plan.</p> <p>It is notable that the Pre-Publication Draft Local Plan did not seek to impose any specific limitations on the height of tall buildings for Site Allocation RIV10. Conversely, it sought to establish that the threshold for where a building would be considered as 'tall' at the Site was 8 storeys. The Pre-Publication Draft Local Plan subsequently sought to impose a requirement for any development proposals for tall buildings at the Site to be assessed in accordance with Local Plan Policy LP4. This requirement is replicated within the Publication Draft Local Plan for which these representations seek to respond to.</p> <p>Policy LP4 of the Pre-Publication and Publication Draft Local Plan documents state that proposals for tall buildings will only be appropriate in tall building zones (as defined at Appendix 2) and assessed against the criteria set out in Parts C and D of the London Plan Policy D9 and those set out at Policy LP4.</p>

London Plan Policy D9 Part C relates to visual, functional, environmental and cumulative impacts associated with tall buildings whilst Part D deals with opportunities for public access.

Critically, the definition of tall buildings, as set out at Part A of Policy D9, reads that this should be based on local context. Furthermore, paragraph 3.9.2 of the London Plan states that Boroughs should determine and identify locations where tall buildings may be an appropriate form of development with reference to their form, character and capacity for growth.

The supporting text to London Plan Policy D9 (paragraph 3.9.3) further states that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context.

Wandsworth Publication Draft Local Plan Policy LP4 builds upon this further by proposing a requirement to consider any impacts on spatial hierarchy. In this respect, Policy LP4 part B-7 states that the massing of any proposed tall buildings should be proportionate to the local environment.

In reviewing the requirements of the adopted London Plan and emerging Wandsworth Local Plan it is clear that the established context is a key factor to determining what is an appropriate height for any future development proposals which may include tall buildings.

It follows that there is a need to consider the immediate existing and evolving context for the Site in order to determine an appropriate height for tall buildings at Allocation RIV10. In this case it is noted that the approved Coda development scheme (currently under construction) and located directly adjacent to the Site includes provision for up to 24 storeys. As such, this sets the context for what is a 'landmark' style development within this area of Wandsworth's Riverside and particularly when read within the context of existing tall buildings nearby such as Battersea Reach (16 storeys) and Plantation Wharf (18 storeys).

The Site is also located within the defined boundary of the Lombard Road / York Road Riverside Focal Point for which the Council adopted a Supplementary Planning Document for in December 2015.

At page 7 of the SPD it is stated that the Site forms part of a "cluster of sites at the southern end of the Focal Point and represents one of the other significant opportunities to create a new 'destination' quarter based on the arts and creative workspace.

The Site is assessed in further detail at page 32 of the SPD. Here, it is noted that the height at which a development in this location will be considered 'tall' is 9 storeys¹. Furthermore, the justification for a tall building in this location is that it would have the potential to allow the delivery of high quality public realm at ground level and could be a positive feature in the townscape.

In accordance with the objectives that were established by the Focal Point SPD, the area around York Road area has been undergoing a process of redevelopment in recent years. This includes the Coda development to the immediate north east of the Site, which was granted planning permission in February 2018 and comprises a mixed use residential scheme of 6 - 24 storeys (up to 81.95 metres tall).

Whilst it is acknowledged that the approval of the Coda scheme pre-dates the Publication Draft Local Plan it should still be noted that heights of up to 24 storeys was deemed to be acceptable. As set out above, this scheme is considered to act as the marker for what is considered to be a landmark building within this area of the Borough and provides the context to which other tall buildings such as Plantation Wharf (18 storeys) and Battersea Rise (16 storeys) respond to.

Given the proximity of the Site to the Coda development scheme and the fact that both exhibit similar characteristics (frontage to York Road and similar set back from the River Thames) it follows that the general parameters for what is an appropriate height for taller buildings should be applied with a degree of consistency.

¹ This is 2 storeys higher than the lower end of the maximum height range which the Publication Draft Local Plan seeks to impose for Site Allocation RIV10

	<p>Specifically, this should facilitate the potential for any future development scheme at the Site to respond directly to the immediate context which has already been established. Conversely, the imposition of a maximum height range of 7-10 storeys for Site Allocation RIV10 as currently proposed by the Publication Draft Local Plan prevents this from being realised and is not consistent with the London Plan or NPPF.</p> <p>It is understood that the introduction of those specific height parameters set out above arises from analysis undertaken by Arup as part of the December 2021 Urban Design Study. We provide further comment on this document below as part of our representations to Draft Site Allocation RIV10.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations. For clarification, the site does not lie within an Opportunity area.</p> <p>Following the publication of the London Plan (post Reg 18 consultation), the Regulation 18 consultation comments and the advice of the GLA and Historic England, the council produced an updated UDS which allowed for the consideration of setting maximum heights for locations acceptable for Tall Buildings. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings. Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	260
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p><i>LP10 – Responding to the Climate Crisis – (Ingate Place and Lombard Road)</i></p> <p>The principle of sustainable design being reinforced within the policy to mitigate the impacts of climate change is noted. We are also pleased to see that LBW have recognised that some buildings may be challenged by the target requirement to meet BREEAM 'outstanding' accreditation. This is something that a B8 Storage and Distribution centres may find challenging to hit due to the nature of their relatively stripped back building form and function.</p> <p>LP 10 part (C) outlines that non-residential development should achieve a 15% reduction through energy efficiency measures alone, but this may be practically difficult for a B8 storage and distribution centres, which are the lowest intensity emissions in the real estate sub sector⁶, to achieve as the existing units may not be a large energy consumer.</p> <p>Moreover, the requirement to provide a payment in lieu via a carbon offset fund when on-site carbon reductions are not achieved able has the potential to impact the viability and subsequent deliverability of a development proposal. We would therefore advise LBW to alter LP 10 (C) so carbon offset payments are required subject to viability.</p> <p>⁶ Overview of real estate companies' environmental performance, October 2021 (https://assets.kpmg/content/dam/kpmg/ie/pdf/2021/10/ie-overview-of-real-estate-companies-environmental-performance.pdf)</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The London Plan Policy SI2 sets out the requirement for non residential development to achieve 15 per cent reduction through energy efficiency measures and that if that can not be met the a contribution to the carbon off set fund should be made. LP 10 reflects this target.</p> <p>In addition within the background text to policy LP10 the Council recognises that there may be exceptional circumstances where it is not technically feasible for a development to achieve a reduction in carbon dioxide emissions. Any justifiable shortfall in on-site reductions will need to be met through a cash-in-lieu contribution to the Council's Carbon Offset Fund, agreed through a Section 106 legal agreement in line with the Planning Obligations SPD. The Carbon off set fund has been set and is in line with the London Plan figure of £95 per tonne. This has been through viability testing by the GLA. Carbon offsetting is the last resort and therefore all efforts should be maximised to ensure on site reductions are met which the GLA evidence has shown can be achieved.</p>
Proposed Change	No change required.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	261
Title	LP35 Mixed-Use Development on Economic Land

Number	Policy 46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP35 - <i>Mixed-Use Development on Economic Land</i> and LP37 - <i>Requirements for New Economic Development</i> - <i>Ingate Place and Lombard Road</i></p> <p>Part A(3) of policy LP35 outlines that the redevelopment of industrial floorspace within Focal Points of Activity should seek to maximise the re-provision of existing industrial uses.</p> <p>Policy LP37 outlines that that mixed-use developments that include a mix of residential and other commercial uses can come forward providing there are no detrimental impacts on the amenities of proposed residents.</p> <p>Safestore support policies LP35 and LP37, as there are many examples of Safestore co-habiting with other land used within the capital, such as stores in Marble Arch, Camden, Hackney, Notting Hill and Chelsea.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	262
Title	LP23 Affordable Housing

Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP23 – Affordable Housing – (Lombard Road)</i></p> <p>This draft policy seeks to maximise the delivery of affordable housing in line with the threshold approach set out in Policy H5 of the London Plan (2021).</p> <p>As drafted, Policy LP23 (Part E), states that viability information will only be accepted in exceptional circumstances. Clarity is sought from the Council in this regard as the use of 'exceptional circumstances' results in confusion within the drafting. Where a site or development is not capable of coming forward in line with the threshold approach set out in Policy H5 of the London Plan, or where the policy compliant tenure split is not deliverable, a viability case should be capable of being advanced with the Council.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The wording refers to Criterion F of Policy H5, which sets out the circumstances under which viability information will be required. This is effectively 'exceptional' to meeting the threshold approach.</p>
Proposed Change	No change required

Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	263
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP33 – Promoting and Protecting Offices – (Ingate Place)</i></p> <p>This draft policy establishes the borough’s approach to office development by focussing employment development to key strategic areas such as the Central Activities Zone (‘CAZ’), town centres and the Vauxhall, Nine Elms and Battersea Opportunity Area (‘VNEB’). The LBW Employment Land and Premises Study (‘ELPS’, 2020) indicates there is a net additional requirement for 22,500 sqm of office floorspace over the emerging plan period. We support the strategic need to deliver new office floorspace within the wider VNEB, and suggest the BDTQ can make a significant contribution to this figure.</p> <p>As drafted, we consider that the planning policy LP33 has not considered the potential for Ingate Place to attract larger business with an appetite for larger office floorplates. The current land use designations that support only SME office floorspace has the potential to increase vacancy rates, decrease employment density and curtail the potential of the Site to provide a significant amount of jobs and growth that contribute to the strategic aims of the plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The BDTQ concept is not intended to accommodate larger businesses, but rather SMEs. This has long been the aspiration for the redevelopment of this part of the Queenstown Road, Strategic Industrial Location, as is clearly set out in LP34.4.a and in the supporting text (see paragraphs 18.32 to 18.35). The Local Plan identifies locations that are appropriate for larger businesses which provide sufficient capacity to meet the identified need, founded on the analysis and recommendations of the Employment Land and Premises Study.
Proposed Change	No change considered necessary.
Consultee Full Name	Safestore

Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	264
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP34 – <i>Managing Land for Industry and Distribution – (Ingate Place)</i></p> <p>This draft policy suggests that within the BDTQ, SME office accommodation will be appropriate on upper floors if intensification of industrial uses on the site are also delivered within a proposal. The introduction of SME office accommodation is broadly supported by Safestore. A more flexible policy approach will enable development proposals to bend to changing market conditions, thereby submitting viable planning applications that are able to contribute to the wider targets of growth within the LBW Local Plan.</p> <p>Notwithstanding the flexibility of introducing SME space above industrial land, we feel that this policy should align with the London Plan Policy E5, which states that in their development plans Boroughs should explore opportunities to intensify, consolidate and make more efficient use of land in SIL, particularly through the principles set out in London Plan Policy E5(B) which promotes intensification and co-location.</p> <p>The London Plan supports the opportunity to intensify existing employment and industrial uses, as part of a plan-led process. In order for the local plan to be considered sound, it must be consistent with regional and national policy. Wandsworth's draft policy LP34 should reflect the attitudes towards intensification, co-location and substitution within the London Plan.</p> <p>We suggest that through Wandsworth's Local Plan review these opportunities for intensification and co-location should be encouraged to facilitate existing sites to make the maximum contribution to the Borough. Providing the flexibility could provide optimal conditions for start-ups, SME's and a strong economic base for local jobs as the market and demands shift, allows the local economy to flourish, in line with the aims of the Nine-Elms Opportunity Area and the BDTQM.</p> <p>As is evident across London, a blend of different uses in the same location can create successful hubs of activity, which deliver resilient places. We consider that a degree of flexibility to these designations would greatly benefit the site, enabling landowners to take a proactive approach towards the needs of Ingate Place. There are therefore many potential land uses that could be successfully co-located with a B8 storage and distribution centre which would complement the strategic objectives of the Nine Elms/Battersea Opportunity area and the more localised BDTQM.</p> <p>Restricting the potential land uses on-site has decreased the development opportunities for Ingate Place and its ability to contribute to the BDTQM and wider Battersea/Nine-Elms Opportunity Area. The designated land- uses are overly specific and have a disregard for any flexibility that the area may need to adapt to meet the rapidly changing future markets and needs.</p>

	<p>For reasons that have been discussed, the site has significant unrealised potential for intensification and a clear strategic policy promoting commercial and other uses would help to unlock this. Enabling a mix of employment and non-employment uses within Ingate Place would provide place-making benefits such as increased vitality through integrating culture, community and workspace to create a thriving place. It can also provide economic benefits through opportunities for cross-collaboration between businesses, cross-subsidy to enhance the viability of development proposals to facilitate delivery, and the potential for employment land intensification.</p> <p>Establishing a more flexible approach to the planning policy framework would benefit the wider LBW economy as well as this specific site. As currently drafted, the local plan is therefore not in general conformity with the national policy, specifically paragraph 11 of the NPPF, which seeks to ensure plan policy is sufficiently flexible to adapt to rapid change</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Broad support for the policy is noted. The Council consider that the approach towards the co-location of SME office accommodation and research and development uses (on upper floors) alongside intensified industrial uses is the appropriate form of intensification for this area and is supported by a robust evidence base in the Employment Land and Premises Study. This approach permits an appropriate amount of flexibility, and it is noted that the Council has received a number of planning applications that are considered to be viable and which are consistent with the strategy.</p> <p>Set against the identified need for industrial floorspace – and in accordance with the requirements of the NPPF, paragraph 82 – it is not the borough's desire to de-designate areas that currently form the borough's reservoir of industrial land (Strategic Industrial Locations and Locally Significant Industrial Areas). This is set out within the supporting text of the Local Plan (see paragraph 18.34), and officers provide further detail in response to Safestore PLC's comment #254.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	265
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p>LP38 – <i>Affordable Workspace - (Ingate Place and Lombard Road)</i></p> <p>Safestore encourage the provision of facilities and resources that support the success of a diverse range of businesses to grow without being unfairly constrained by the size and cost of their premises. It is our view that affordability is achieved through a range of measures including the specific product, and flexible terms of occupation, which is currently offered by the existing Safestore self-storage unit and business centre at Ingate Place.</p> <p>LP38 is currently ineffective when applied to B8 storage and distribution units. Proposing a prescriptive 10% affordable workspace target is counter-productive to the operation of a self-storage site. For example, a self-storage centre requires the ground floor area to be available for easy to access storage and because of this, the ground floor space is often the most commercially valuable element of that form of development, meaning that some self-storage business models may be reliant upon the ground floor space being dedicated solely to their operation. It may therefore be unviable for many self-storage operators to relinquish the ground floor space to external affordable workspace operators.</p> <p>It would not be practical to provide affordable workspace on upper floors due to the requirement of installing lifts and separate stair cores and lobbies to make them accessible and separate units and new structural floors. This would reduce the total ground floor area for the B8 storage units, rendering them unviable.</p> <p>This should also be considered in the context of Safestore's business model of providing flexible storage space. Approximately 50% of storage space across Safestore's network are occupied by businesses of which a high proportion are SMEs. In terms of B8 storage units, affordability is not just about rental price. It is about the flexibility of terms, being able to exit an agreement at short notice, the ability take less or more space to respond to a businesses' fortunes. Self-storage units provide an affordable product through a package of flexible measures which are overlooked.</p> <p>This draft policy requires proposals delivering over 1,000sqm of economic floorspace (such as offices) to provide at least 10% of the gross economic floorspace as affordable workspace. Whilst we acknowledge the affordable workspace policy in principle, due to its current inflexibility it is not effective and cannot be considered to be "sound". The policy as currently drafted requires applicants to deliver 10% of gross proposed economic floorspace even in an area which may see little SME demand, thereby making the space unlettable. This inflexibility can be corrected through applying the 10% threshold to the proposed net additional economic floorspace.</p> <p>A similar issue was raised by Inspector Mike Fox in his Inspector's Report to the Lambeth Main Modifications, whereby he noted '<i>...the requirement of the policy to deliver 10 per cent of total floorspace, as drafted, for affordable workspace, provides very little flexibility in areas where SMEs have been declining due in part to high land costs.</i>'⁷ Inspector Fox continued that by applying the threshold to the gross floor area, Lambeth's policy as drafted overlooks the back of house/circulation areas, which are not linked to specific users. As such, an affordable workspace applied to the net additional floorspace would result in a more 'efficient and equitable way of calculating such provision.'</p> <p>7 Paragraphs 134-135 of Lambeth's Local Plan (2021) Inspector's Report (https://beta.lambeth.gov.uk/sites/default/files/2021-07/Lambeth%20Local%20Plan%20Report%20-%20final_3.pdf)</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. In response to similar comments raised during the consultation on the Pre-Publication version of the Local Plan, a caveat was introduced to the supporting text of Policy LP38 stating that: "The Council may choose to disapply the policy requirement set out in Part A [with respect to the provision of 10% of the floorspace to be provided as affordable or open workspace] for large-floorplate storage and distribution uses falling within Use Class B8, where it can be demonstrated that the sub-division of the floorspace is not practical and/or viable". It further states: "It will, however, generally be applied to proposals, including for self-storage facilities, where individual units could be leased at a reduced rent or where storage and distribution uses are provided in conjunction with office facilities". This is considered to provide suitable flexibility such that, if it could be demonstrated as part of a planning application that office provision on upper floors would require separate access or that appropriate affordability features were included within the business model, the disapplication of the policy requirement may be considered. As is clear from the supporting text, and set out in the Council's previous response, the application of the policy seeks to ensure affordable provision where offices and storage space are provided in tandem (as a single lease), which is common in such facilities. It would not be expected for a self-storage facility to incorporate a separately run affordable workspace operator on site.</p>

	<p>The Employment Land and Premises Study has assessed requirements for affordable workspace across the borough, which recognises that the extent to which workspace is deemed 'affordable' varies considerably based on the type of business which the workspace is provided to accommodate - and a tailored approach is applied between the VNEB OA and the rest of the borough (accounting for different office markets). Proposals for over 1000 sqm of economic floorspace, however, are very likely to either be located in areas in which there is an existing economic cluster, in town centres, or in the VNEB OA - all of which have identified demand for types of affordable workspace provision. The policy, combined with the sequential preferential location approach set out in LP33, is unlikely to therefore result in proposals for over 1000 sqm of economic floorspace coming forward where there is not the associated SME demand. The amendments as suggested would lessen the current policy requirements and result in less affordable provision coming forward, which is considered contrary to both the needs of the borough and the strategic ambitions on the Local Plan.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Safestore
Consultee Organisation Details	
Agent Full Name	Matthew Lloyd Ruck
Agent Organisation Details	Planner Savills
Comment ID	266
Title	LP51 Parking, Servicing and Car Free Development
Number	Policy 62
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP51 – Parking, Servicing and Car Free Development - (Ingate Place and Lombard Road)</i></p> <p>Draft policy LP51 (Part D) requires car-free development where a given site has a PTAL 4 rating. We are generally supportive of LBW's ambition to reduce car parking across the borough but would advise LBW to consider the car parking strategies on a case-by-case basis through the development management process, informed by a Transport Assessment and/or other appropriate documents. There does not appear to be any evidence base documents to underpin the position that PTAL 4 is the default car-free position. The policy as currently drafted appears unnecessarily rigid and may contradict applicant efforts to encourage the use of more sustainable transport modes. This draft policy is therefore not justified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	London Plan Policy T6 Car Parking and it's associated parking policies outline the requirement for parking to be car-free in areas with a PTAL of 4 or higher. This Policy is in accordance with this position.
Proposed Change	No change considered necessary.

Consultee Full Name	Charities Property Fund
Consultee Organisation Details	
Agent Full Name	Mr Tim Price
Agent Organisation Details	savills
Comment ID	267
Title	Paragraph
Number	2.59
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Spatial Strategy</i></p> <p>In respect of the Spatial Strategy outlined by the Publication Draft Local Plan it is noted that the Site is identified to form part of the Clapham Junction Opportunity Area as illustrated at Map 2.1 Key Diagram on page 32 of the consultation document.</p> <p>Policy SD1 of the London Plan 2021 states that the Mayor will take steps to ensure that Opportunity Areas fully realise their growth and regeneration potential. This includes supporting regeneration, and ensuring that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities.</p> <p>This policy also sets out that Boroughs (including LB Wandsworth), through Development Plans and decisions, should clearly set out how they will encourage and deliver the growth potential of Opportunity Areas. This includes a requirement to establish the capacity for growth in order to take account of indicative capacity for homes and jobs as set out at Table 2.1 of the London Plan 2021.</p> <p>Table 2.1 of the London Plan states that the Clapham Junction Opportunity Area is expected to deliver an indicative capacity of 2,500 homes and 2,500 jobs for the period up to 2041. Whilst the specific boundary for this Opportunity Area is still yet to be defined the inclusion of the Site within the indicative area for this signals a requirement for proper consideration of how it can fully contribute towards the targets set out by the adopted London Plan.</p> <p>The Publication Draft Local Plan confirms that the London Plan sets a target for Wandsworth of 19,500 additional homes to be provided over a ten-year period from 2019/20 to 2028/29 (paragraph 2.8).</p>

	<p>In order to achieve this, the Council sets out a Spatial Development Strategy at Draft Policy SDS1 of the Publication Draft Local Plan. Part A of this Strategy states that within the period 2023-2038 provision will be made for a minimum of 20,311 new homes to be delivered within the Borough.</p> <p>The Council further states that the new homes which are required will be allocated in accordance with a sequential approach set out at Draft Policy SDS1. This approach prioritises the delivery of new homes at a series of locations which are characterised by their strategic economic role and/or opportunities for regeneration.</p> <p>The Site is located within the defined boundary of 'Wandsworth's Riverside' for which the Overarching Area Strategy set out at Draft Policy SDS1 establishes a total capacity for 1,098 new homes. It follows that the redevelopment of the Site will be critical to the realisation of the Council's ability to meet its required housing targets in this part of the Borough. This is an important consideration in respect of the context for determining the appropriateness of any height limitations proposed for the Site.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Map 2.1 Key Diagram provides only an indicative overview of the spatial strategy set out within the Local Plan. The Clapham Junction Opportunity Area boundary is set out in more detail in Map 6.1 Spatial Area Map: Clapham Junction and Winstanley / York Road Regeneration Area and Map 6.2 Inset Map. The boundary can also be viewed online on the Council's interactive map of the draft policy designations. The site at 200 York Road is not included within the more detailed boundary, which has been agreed by the Greater London Authority and Transport for London.
Proposed Change	No change considered necessary.
Consultee Full Name	Charities Property Fund
Consultee Organisation Details	
Agent Full Name	Mr Tim Price
Agent Organisation Details	savills
Comment ID	268
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p>General Comments</p> <p>The National Planning Policy Framework ('NPPF') requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p> <p>Local planning authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change.</p> <p>They should be consistent with the principles and policies of the NPPF, and should be aspirational but realistic to address spatial implication of economic, social and environmental dimensions.</p> <p>Planning policies should amongst other things be '<i>flexible enough to accommodate needs not anticipated in the plan...to enable a rapid response to changes in economic circumstances</i>'³. Paragraph 120 states that planning policies should encourage multiple benefits from urban land.</p> <p>At the heart of the above is a presumption in favour of sustainable development which for plan-making means positively seeking opportunities to meet development needs of an area, and be sufficiently flexible to adapt to rapid change.</p> <p>As the new Wandsworth Local Plan emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development in sustainable locations across the Borough.</p> <p>We provide commentary on the overall context, vision and area strategies as set out within the Publication Draft Local Plan below. These matters all necessarily inform the more detailed consideration of the allocation of the Site.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Charities Property Fund
Consultee Organisation Details	
Agent Full Name	Mr Tim Price
Agent Organisation Details	savills
Comment ID	269
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	

Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Introduction</p> <p>We write on behalf of our client, Charities Property Fund c/o Savills Investment Management LLP ('SIM'), in respect of its interests in land at 200 York Road, Battersea, London, SW11, 3SA.</p> <p>Specially, this correspondence is submitted to provide a formal consultation response to the London Borough of Wandsworth Draft Local Plan Publication (Regulation 19) Version (January 2022) (the 'Publication Draft Local Plan').</p> <p>SIM acts on behalf of the freehold owner of the land at 200 York Road ('the Site'). This currently comprises of an existing 3-5 storey building which is currently occupied by Travelodge as a hotel with associated car parking and access.</p> <p>The Site is currently proposed for allocation for residential and commercial uses within the Publication Draft Local Plan under Site Allocation Ref: 'RIV10' – 200 York Road, Travelodge Hotel, SW11'.</p> <p>SIM supports the overarching aspirations for investment and growth within Wandsworth as detailed within the Publication Draft Local Plan. However, it strongly advocates that in order to help realise these aspirations and for the Draft Local Plan to be found 'sound', the Council should make material amendments to the emerging Local Plan in order to capture greater potential for the redevelopment and / or intensification of existing 'brownfield sites'.</p> <p>In particular, Site Allocation RIV10 presents a significant opportunity for intensification in terms of quantum and diversification of uses, as part of a comprehensive residential led mixed use development which includes taller buildings than currently identified.</p> <p>It should be noted that our client has only recently acquired the Site and therefore wasn't in a position to submit representations to earlier stages of consultation that have been previously undertaken by the Council. As such we would welcome the opportunity to meet with officers to discuss the range of issues relating to its current evidence base and the potential for the Site to better contribute towards meeting strategic objectives as outlined by the Publication Draft Local Plan.</p> <p>We trust that the content of this consultation response will be considered fully by the Local Planning Authority('LPA') and afforded the appropriate level of weight in preparing the next version of the Local Plan.</p> <p>Executive Summary</p> <p>In summary, whilst our client would confirm its support for the identification of Site Allocation RIV10 in principle, it strongly objects to the imposition of a maximum height range of 7-10 storeys as currently set out at paragraph 11.69 of the Publication Draft Local Plan for the following reasons:</p>

- 1 The Wandsworth Borough Council Urban Design Study – Executive Summary (December 2021) which forms part of the technical evidence base for the Publication Draft Local Plan does not support the proposed limitation on building heights at the Site, which benefits from a surrounding context which includes tall buildings (existing and proposed buildings of 20 storeys or greater).
- 1 Capping building heights at the Site in the manner currently proposed would significantly limit the prospects of securing redevelopment due to the impact on overall scheme viability. It follows that any regeneration objectives (e.g. improved public realm and contribution to the delivery of commercial uses / Focal Points of Activity aren't realised) and an increase in residential numbers and hotel bed spaces is lost.
- 1 Site Allocation RIV10 as drafted fails to optimise the development potential of the Site. This is in direct conflict with the aspirations of the London Plan and the overarching strategic objective to secure sustainable development and make most effective use of land as set out in the NPPF.

Based on the above the Publication Draft Local Plan as drafted, and particularly in regard to allocation RIV10, does not meet the tests of soundness identified at Paragraph 35 of the National Planning Policy Framework ('NPPF'). In particular, it is not justified, not effective and is inconsistent with the provisions of the NPPF and the London Plan 2021.

In failing to plan positively to realise the potential / capacity of the Site the Council serves to place unnecessary and undue stress on other areas of the Borough and elsewhere in Greater London to meet an identified requirement for the delivery of new homes.

Our client also requests that Site Allocation RIV10 is amended to include provision for hotel uses to be retained at the Site as part of any comprehensive development scheme. Such uses would ensure that there is sufficient flexibility to enable re-provision of the existing hotel facility in a location where this can continue to support the Borough's visitor economy.

The justification for our requested amendments to the emerging Local Plan are set out in further detail as part of this consultation response.

The Site

As set out above, our client's land ownership comprises the Site at 200 York Road.

It measures approximately 0.25ha and is bound to the east by York Road and to the north by Gartons Way. The Site currently accommodates a 3-5 storey Travelodge hotel with associated car parking and access.

The Site is well located for public transport, being roughly 10-15 minutes' walk from both Clapham Junction and Wandsworth Town railway stations. It has a Public Transport Accessibility Level (PTAL) score of 6B ('Excellent'), which is the highest possible designation and defines it to be in a very sustainable location accessible by a wide range of public transport modes.

In respect of surrounding context, the Site forms part of an immediate area which includes a number of existing and permitted high density developments. This includes the adjacent Coda development site located to the immediate north east where permission was granted by the Council in 2018 for a mixed use scheme of 6-24 storeys (up to 81.95 metres tall) and the Plantation Wharf site to the north which comprises 16-18 storeys.

Representations to the Publication Draft Local Plan

The Publication Draft Local Plan consultation seeks to identify sites to meet Wandsworth's need for housing,

	<p>employment sites and other uses.</p> <p>It is further stated that Site Allocations are identified as the key sites which are considered to assist with the delivery of the Borough's Spatial Strategy which targets the provision of a minimum of 20,311 new homes over the Local Plan period (2023-2038).</p> <p>Whilst our representations are focussed primarily on the Council's proposed wording for draft Site Allocation RIV10 we would note that the comments made also relate to the delivery of the wider strategic policies of the Publication Draft Local Plan by association. In particular, it is maintained that the Council's failure to optimise the development potential of appropriate sites such as RIV10 place undue and unnecessary pressure on other parts of the Borough / other Boroughs within Greater London.</p> <p>We set out our responses to the relevant elements of the Publication Draft Local Plan and associated evidence base below.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary
Consultee Full Name	The Original Tour/RATPDev
Consultee Organisation Details	
Agent Full Name	John Cutler
Agent Organisation Details	Associate Planning Director BNP Paribas Real Estate
Comment ID	270
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	

<p>Soundness - Complies with Duty to Co-operate?</p>	
<p>Details of reason(s) for representation</p>	<p>Wandsworth Local Plan Review (Regulation 19)</p> <p>Representations submitted on behalf of The Original Tour – Wandsworth Bus Garage</p> <p>We write to submit Representations on behalf of The Original Tour ('TOT') and RATPDev in response to the Council's Local Plan Review (Regulation 19). TOT/RATPDev supports the Council's intention to review its Local Plan in order to deliver the development needs of the borough, and welcomes the inclusion of a site allocation for Wandsworth Bus Garage (Draft Site Allocation WT17). However we highlight a number of points of concern within the detail, and recommend alterations to ensure the allocation meets the tests set out at Paragraph 35 of the National Planning Policy Framework (NPPF).</p> <p>BACKGROUND</p> <p>Land Ownership</p> <p>TOT is a bus operator and a subsidiary of RATPDev, a transportation company based in France but operating across Europe and beyond. TOT operates its Central London sightseeing tours from Wandsworth Bus Garage ('WBG'). The Covid-19 pandemic has had significant implications on the operations at WBG given the change in tourist activities over the last two years. Therefore, TOT and RATPDev have had to review their operations, and have made the decision to vacate the site in Q1 2023. The letter provided by TOT at Appendix 1 confirms this.</p> <p>The withdrawal of the transport use frees up the site for various potential alternative uses, with the potential for sensitive extensions and infill development. It is important that this is recognised within the site allocation.</p> <p>Grade II Listing</p> <p>WBG is grade II listed, and the Historic England listing is included at Appendix 2 for reference. As identified on the Historic England website:</p> <p><i>'The Details section within the List entry Description describes the asset's form, materials, development, style, design and layout, as relevant to that type of building, monument or landscape. It is not an exhaustive description, but a summary of the main features of the building or site...</i></p> <p><i>'The description may be a useful starting point for understanding the claims to special interest, but it will not be the last word. Originally, list entries were brief and intended to help with identification. In recent decades, particularly since the start of post-war listing, greater efforts have been made to explain the history of a building and to outline its claims to special interest'. [our emphasis]</i></p> <p>The building was first listed in 1983. Whilst listings do not provide detailed assessments of listed buildings, given the above it is clear that broadly speaking, the listing would highlight the main physical features of the building to which its special historic interest relates. In that respect it is salient that the 'Details' element of the listing focusses on materials, fenestration, and detailed architectural details on the southern, eastern and northern elevations. There is recognition that the entrance (southern) elevation has been altered. Significantly, there is no mention of the roof form or roof material.</p> <p>Existing Site Allocation</p> <p>The site is allocated in the Wandsworth Local Plan (Site Specific Allocations Document 2016 and Employment and Industry Document December 2018), potentially for a mixed use development with residential use if a suitable alternative bus garage site could be provided. Alternatively, if the bus garage use remains unaffected, some residential development may be considered appropriate at the upper levels. The site allocation infers that the addition of new build floorspace would be acceptable in conjunction with the re-instatement of the south elevation potentially to its original position (circa 8 metres towards Marl Road). To finance this, a roof extension would be appropriate if 'limited to perhaps 2 storeys of accommodation'. The site allocation also sets out other design principles.</p> <p>London Borough of Wandsworth Aspirations</p> <p>Before setting out our proposed alterations to site allocation WT17, it is important to highlight the London Borough of Wandsworth ('LBW') aspirations for the WBG site and the surrounding area. As indicated in the adopted Wandle Delta Supplementary Planning Document ('WDSPD') (September 2021), within which the site sits, <i>'The Wandle Delta will be a place that puts people first - strengthened as a mixed urban neighbourhood, a focus for living and working, and a local destination for visitors'</i>(4.1.2).</p> <p>It is clear from the draft WDSPD document that significant change is proposed within the Wandle Delta Area, with a focus on residential-led mixed use development. It is clear that the strategy for the area seeks to move away from the domination of vehicles within the area (2.2.19). Within the Urban Design Study (2020), the site is identified within character area G1 Wandsworth Town and Riverside. Within this character area, WBG is highlighted as a 'valued feature.' At the same time, the 'negative qualities' of this area include the:</p> <p><i>'Dominance of large industrial buildings is unwelcome, including palisade fencing, blank façades and the presence of heavy good vehicles/waste trucks with smell, noise and pollution. These combine to make a harsh pedestrian environment and poor legibility...'</i></p>

It is clear from reviewing the Council's documents that LBW's ambitions seek the removal of the existing transport use to provide for other uses, and for a high degree of change to the bus garage itself and the immediate surrounds.

PLANNING POLICY CONTEXT

National Planning Policy Framework (2021)

The NPPF sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.

The principal test guiding policy adoption is that of 'soundness', namely that the plan should be (NPPF Paragraph 35):

- **'Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and **consistent with achieving sustainable development**;
- **Justified**– the plan should be the **most appropriate strategy**, when considered against the reasonable alternatives, **based on proportionate evidence**;
- **Effective**– the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' [our emphasis]

Sustainable Development

The purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). Paragraph 11 sets out that for plan-making, the application of the presumption in favour of sustainable development means that:

'a) plans should **positively seek opportunities** to meet the development needs of their area, and be **sufficiently flexible to adapt to rapid change**;

b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...*' [our emphasis].

Efficient Use of Land

Paragraph 119 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses. Paragraph 120 goes on to state that planning policies should (inter alia):

'a) encourage multiple benefits from both urban and rural land, **including through mixed use schemes** and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

c) give substantial weight to the value of using **suitable brownfield land within settlements for homes and other identified needs**, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and **support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing** where land supply is constrained and **available sites could be used more effectively** (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) support opportunities to **use the airspace above** existing residential and **commercial premises for new homes**. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.' [our emphasis]

Heritage

Section 16 of the NPPF provides the policy framework for heritage assets. Paragraph 190 states:

'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and **putting them to viable uses** consistent with their conservation;

b) the wider **social, cultural, economic and environmental benefits** that conservation of the historic environment can bring;

c) **the desirability of new development making a positive contribution to local character and distinctiveness**; and

d) **opportunities to draw on the contribution made by the historic environment to the character of a place**.' [our emphasis].

Paragraph 192 states that local planning authorities should maintain or have access to a historic environment record, which should contain up-to-date evidence about the historic environment in their area and be used to (inter alia) assess the significance of heritage assets and the contribution they make to their environment.

The NPPF provides a robust policy context for considering the potential impacts of development proposals on heritage assets in the decision-making process. In particular:

- Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.
- Paragraph 195 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- Paragraph 197 states that in determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to **viable uses** consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their **economic vitality**; and
 - c) **the desirability of new development making a positive contribution to local character and distinctiveness.**' [our emphasis].

Paragraphs 199 to 202 then provides a detailed framework for considering the potential impacts of a development on heritage assets through the decision-making process. In particular:

- Paragraph 200 states **any harm** to, or loss of, the significance of a **designated heritage asset** (from its alteration or destruction, or from development within its setting), should **require clear and convincing justification**. Substantial harm to Grade II listed buildings should be exceptional. [our emphasis].
- Paragraph 202 states that where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be **weighed against the public benefits** of the proposal [our emphasis].

London Plan (2021)

Optimisation of Previously Developed Land for Housing

Policy H1 of the London Plan states that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans, especially on sources of capacity including (inter alia):

- a) *'sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary; and*
- c) **housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.'**

In this respect, WBG site is around 200m from Wandsworth Town Station, and 600m from Wandsworth Town Centre, it has a PTAL of 4, and comprises low-density transport infrastructure land.

Tall Buildings

Policy D9 states that Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Any such locations and appropriate tall building heights should be identified on maps in Development Plans.

Heritage

Policy HC1 states that:

*'B) **Development Plans** and strategies should demonstrate a **clear understanding** of the historic environment and **the heritage values of sites** or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

- 1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) *utilising the heritage significance of a site or area in the planning and design process*
- 3) *integrating the conservation and enhancement of heritage assets and their settings with **innovative and creative contextual architectural responses** that contribute to their significance and **sense of place***
- 4) *delivering **positive benefits** that conserve and enhance the historic environment, as well as **contributing to the economic viability, accessibility and environmental quality** of a place, and to **social wellbeing.**'*

*C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and **identify enhancement opportunities** by integrating heritage considerations early on in the design process.'* [our emphasis].

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The departure of the current user would not remove the sustainable transport function as it is a bus garage of which there is a limited number of in the borough. The Council will ensure that the land and infrastructure needed for the Wandsworth and London transport environment to operate efficiently now and into the future is secured and provided for and the site will be protected under LP52 Public Transport and Infrastructure.</p> <p>The Wandle Delta Masterplan SPD and the Urban Design Study should be read in conjunction with the Local Plan. While they may seek to create mixed use housing development and reduce the amount of car dominance there are other policies and factors that will need to be considered.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	The Original Tour/RATPDev
Consultee Organisation Details	
Agent Full Name	John Cutler
Agent Organisation Details	Associate Planning Director BNP Paribas Real Estate
Comment ID	271
Title	WT17 Wandsworth Bus Garage, Jews Row, SW18
Number	Statement 16
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PROPOSED ALTERATIONS TO DRAFT SITE ALLOCATION WT17</p> <p>The adopted and emerging Wandsworth planning policy documents already recognised that the principle of alternative uses and alterations to WBG is acceptable, and that the site has a significant role to play in the vitality of the new neighbourhood around Wandle Delta and specifically Wandsworth Bridge. Indeed, TOT/RATPDev welcome the inclusion of a site allocation and the inclusion of the site within the WDSPD. However, TOT/RATPDev has concerns in respect of the draft site allocation, which in some places does not accord with national and regional (London Plan) policy. This representation proposes a number of alterations in ‘tracked changes’ style accordingly.</p> <p>Paragraph 4.123</p> <p>Paragraph 4.123 states:</p> <p><i>‘Mixed use development including residential, industrial and office uses with a new public square. Residential development above the existing bus garage could be permitted if transport functions would not be affected.’</i></p> <p>Firstly, it is considered superfluous to discuss use classes at this point, as use classes for Sites WT14, WT15, and WT17 are considered later in the allocation in any case .</p> <p>Notwithstanding, for the reasons set out later in this letter, it is considered that this sentence should make clear that leisure and retail uses could also be potentially acceptable in this location.</p> <p>If reference to a public square is to be included, it would be helpful to make clear this is in relation to the land to the north of the cluster along Pier Terrace (as stated later at 4.125).</p>

The second sentence implies that residential use at the WBG site would only be acceptable were the transport use retained, however that is not the case - as demonstrated at paragraph 4.124, residential use would also be appropriate as part of a mixed use scheme.

This part of the draft allocation is therefore considered to not be effective, as it could cause some confusion at the planning application stage.

Proposed Alteration 1:

~~'Mixed use development including residential, industrial, and office, leisure or retail uses. With Provision of a new public square to the north of the cluster along Pier Terrace. Residential development could be acceptable at Wandsworth Bus Garage in principle, including above the existing bus garage. could be permitted if transport functions would not be affected.'~~

'At the Wandsworth Bus Garage site (WT17), proposals for mixed-use with residential development may be considered if a suitable alternative site for the bus garage could be provided.'

For the reasons set out earlier in this letter, the WBG site is surplus to requirements by TOT/RATP Dev, which is due to move operations in Q1 2023. It will therefore shortly represent a vacant site without any ongoing employment use.

Therefore, requiring the relocation of the bus garage to an alternative site is irrelevant, unjustified, and would pose an unnecessary planning constraint to any potential future use of the site.

RATP Dev is a private for profit tour bus company and as such there is no public service/benefit associated with the use. It is also unclear why the site allocation only states that mixed use (with residential) proposals for the site 'may be

considered', when the Council appear to actively support the removal of the transport use and the mixed use re-use of

the site, as set out earlier in this letter. An explicit indication of support should be set out in the site allocation. The list of potential land uses should also be consistent with those set out at 4.130 for the allocation to be effective.

Proposed Alteration 2:

~~'At the Wandsworth Bus Garage site (WT17), proposals for mixed use development including residential, industrial, office, leisure or retail uses' will be supported.' with residential development may be considered if a suitable alternative site for the bus garage could be provided.~~

Paragraph 4.124 continues:

~~'Alternatively, if it can be demonstrated that the requirements of the existing transport use remain unaffected, some residential development may be considered appropriate above the transport use if the development can protect and enhance the Grade II listed building.'~~

Firstly, for the reasons set out earlier in this letter, TOT/RATPDev is vacating the site in the near future, and it is considered unlikely that any incoming purchaser would look to re-use the site for a transport use. Notwithstanding, we agree that residential development may be considered appropriate above a transport use in principle.

It is however, in our view unjustified to state that any development would need to protect and enhance the Grade II listed buildings. 'Protect and enhance' is vague wording, and it is unclear if this means that no harm could be caused to the heritage asset at all. We would therefore question the effectiveness of this wording.

Whilst clearly heritage matters would be a key consideration as part of any future development proposal, national, regional and local policy sets out a clear and established framework for considering these matters in detail. Notably, Paragraphs 200 - 202 of the NPPF allows less than substantial harm to the significance of a designated heritage asset, where this would be outweighed by the public benefits of a proposal.

The proposed wording set out here is therefore considered ineffective, unjustified, and contrary to NPPF Paragraph 200 - 202.

Proposed Alteration 3:

'Alternatively, if it can be demonstrated that the requirements of the existing transport use remain unaffected, some residential development may be considered appropriate above the transport use if the development can protect and enhance the Grade II-listed building, subject to heritage considerations.' **subject to heritage considerations.**

Paragraph 4.128

Paragraph 4.128 states:

'On ... Marl Road ... residential accommodation at ground floor level would not be acceptable and residential accommodation above ground floor level would require a convincing case to demonstrate that any such use would enjoy a satisfactory level of amenity. Measures to mitigate the impact of traffic noise would be required.'

This appears to indicate that residential accommodation at ground floor level fronting Marl Road would not be acceptable due to traffic noise. However, it is noted that allocations WT14 and WT17 (with the garage use removed) would transform Marl Road from a transport-dominated road to a street within a mixed use and low car use neighbourhood. Therefore, it is considered that, subject to noise assessments at the planning application stage, residential use could be appropriate on the Marl Road frontage at ground floor level (as is required for the upper levels in any case).

Proposed Alteration 4:

~~'On ... Marl Road ... residential accommodation at ground floor level would not be acceptable and residential accommodation above ground floor level would require a convincing case to demonstrate that any such use would enjoy a satisfactory level of amenity. Measures to mitigate the impact of traffic noise would be required.'~~

Paragraph 4.128 goes on to state:

'If a transport use is retained, the Wandsworth Bus Garage site (WT17) could include some limited additional floorspace that could be added above the western range of the building (which is largely workshop space). The proposal should be a clearly modern, simple rectilinear form, superimposed over the existing structure and broadly mirroring an element of the north-south multiple roof array over the bus garage proper. The extension must cause no harm to the significance of the structure as a Grade II listed building.'

In general, it is considered that this wording is excessively overprescribed for a site allocation. It places onerous restrictions on development potential of the WBG site, which would in any case be subject to rigorous scrutiny at planning application and listed building consent stage.

The above wording does not allow for the positive strategy for the conservation and enjoyment of the historic environment taking into account the desirability of new development making a positive contribution to local character and distinctiveness (NPPF Paragraph 190), nor does it allow for innovative and creative contextual architectural responses (London Plan Policy HC1(B)).

Stating that any extension must cause no harm to the setting of the structure as a Grade II listed building conflicts with NPPF Paragraphs 200 - 202, which allows some harm to the significance of a designated heritage asset, where this is outweighed by the public benefits of a proposal.

It is also unclear why the allocation indicates that only the western part of the building could be appropriate for this type of upward extension, as there does not appear to be any detailed heritage assessment of the WBG site within the Local Plan evidence base.

Overall, it is considered that this paragraph is overly restrictive, and does not add any value over and above Paragraph 4.124. We therefore suggest it is removed entirely.

Proposed Alteration 5:

~~'If a transport use is retained, the Wandsworth Bus Garage site (WT17) could include some limited additional floorspace that could be added above the western range of the building (which is largely workshop space). The proposal should be a clearly modern, simple rectilinear form, superimposed over the existing structure and broadly mirroring an element of the north-south multiple roof array over the bus garage proper. The extension must cause no harm to the significance of the structure as a Grade II listed building.'~~

Paragraph 4.130

Paragraph 4.130 states:

'Development should not harm the setting of the adjacent listed Bus Garage site (WT17). Sensitive infill development and intensification adjacent to the listed building could be possible. Subject to ongoing operation of the current occupier, proposals to rejuvenate the bus garage for leisure or flexible workspace should be considered.'

In respect of this first sentence, the wording should be amended to reflect NPPF Paragraphs 200 - 202, as presently it conflicts with this policy. The grade II listed building is within close proximity to other draft site allocations, notably WT14 and WT15 within a tall building zone TB-G1d-03 where buildings of between 7 to 15 storeys would be appropriate. Realistically, such development would likely result in some harm to the setting of the listed building (notwithstanding the actual allocation for WBG itself). As currently worded, this paragraph would therefore conflict with the potential for allocations WT14, WT15, and WT17 to be delivered, so is not considered to be effective or justified.

TOT/RATPDev supports the recognition that sensitive infill development and intensification adjacent to the listed building could be possible.

In respect of the last paragraph, we reiterate that TOT/RATP Dev are due to vacate the WBG site in the near future, and so the 'operation of the current occupier' is not relevant. In respect of potential alternative uses, we believe that the site could be appropriate for a range of uses, including leisure, retail, office, self storage, or flexible workspace. In addition, the potential for residential use (as part of a mixed use scheme) at the WBG has already been established at Paragraphs

4.123 and 4.124.

It is also unclear how this last sentence (and specifically the word 'should') would be applied to the determination of a planning application. It is held that 'could' would provide more appropriate wording, to reflect the range of potentially appropriate land uses. It is held that this approach would be consistent with NPPF Paragraphs 190 and 197 which states that in preparing development plans and in determining applications, local planning authorities should take account of economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.

Proposed Alteration 6:

*'Development should not harm the setting of the adjacent listed Bus Garage site (WT17). Sensitive infill development and intensification adjacent to the listed building could be possible **subject to heritage considerations**. ~~Subject to ongoing operation of the current occupier,~~ **Proposals to rejuvenate the bus garage for will be supported. Mixed use development with residential, leisure, industrial, office, or flexible workspace, or retail uses should could be considered.'***

CLOSINGS

We trust that the above provides informative comments to the current consultation.

We would be grateful if you could please confirm safe receipt of these representation and for above comments to be considered before the revised Local Plan is finalised and submitted.

In addition, we request to be kept informed on the Examination proceedings and reserve the ability to take part in any

Examination Hearings on behalf of TOT / RATPDev, or any subsequent WBG landowner.

	Please do not hesitate to contact us should you wish to discuss any of the above further. We would be pleased to meet to discuss the merits of the proposal in detail.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. Paragraph 4.123 includes references to the site allocation's proposed uses (relating to all three sites within this cluster) and duplicating this in the later development considerations paragraphs is consistent with how the site allocation have been prepared. It specifies that states uses that the Council would expect to be included as part of the wider mix (namely: industrial and office). This is consistent with paragraph 82 of the NPPF, which requires policies to identify strategic sites to meet the anticipated needs over the plan period.</p> <p>Further information on site WT17 is included in paragraph 4.130, which includes reference to the provision of leisure uses. This is consistent with uses identified as suitable for the site in the Wandle Delta Masterplan SPD. Retail uses should, however, only be included as part of development where they have passed the sequential test as set out in Policy LP43 Out of Centre Development. This is consistent with paragraph 87 of the NPPF.</p> <p>The details of the improvements to the pocket park are included in paragraph 4.125.</p> <p>Paragraph 4.123 sets out that residential development could come forward if the transport use was retained. It is not the only acceptable way for it to come forward as paragraph 4.124 sets out.</p> <p>LP52 Public Transport and Infrastructure sets out the necessary requirements for development of sites with sustainable transport functions, such as the Wandsworth Bus Garage. As the transport use is still required and consultation has not been undertaken with all relevant stakeholders the site's transport uses will be protected. For this reason, it is also considered appropriate to retain 'Subject to the ongoing operation of the current occupier' in paragraph 4.130.</p> <p>The Wandle Delta SPD does set out to achieve significant change but that does not necessarily justify any redevelopment of the area, the Local Plan will also be considered as part of any proposed redevelopment or change or use.</p> <p>The existing wording of paragraph 4.124 is considered sufficiently flexible and sound as it does not suggest no harm could be caused to the heritage asset at all.</p> <p>The existing wording in paragraph 4.128 is considered sufficiently flexible and sound as it provides an applicant an opportunity to argue their case that if the public transport use were no longer present then the reduced traffic noise would make ground floor residential development acceptable.</p> <p>Paragraph 4.128 is considered to be appropriate and sound as it ensures the protection of important heritage features in the borough. Paragraph 190 of the NPPF identifies that local plans set out a positive strategy for conservation of the historic environment and that this strategy should take account of the desirability of new development making a positive contribution to local distinctiveness etc.</p> <p>The Site Allocation Methodology Paper which was submitted as part of the Local Plan Examination Submission includes a review of each site allocation's heritage considerations.</p> <p>Only the western side would be suitable as it is a workshop and is affected by noise less.</p> <p>The first sentence is considered sufficiently flexible and sound and does not conflict with the NPPF.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	272

Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Consultation on the Wandsworth Publication Draft Local Plan (Regulation 19) Representations made on behalf of Wandsworth Holdings Limited The Town and Country Planning (Local Planning) (England) Regulations 2012</p> <p>Quod is instructed by Wandsworth Holdings Limited ('Wandsworth Holdings') to submit representations to the Wandsworth Publication Local Plan Regulation 19 (hereby the "Reg 19 Plan"). These representations are submitted within the consultation period that runs from 10th January to 28th February 2022.</p> <p>1 Executive Summary</p> <p>On behalf of Wandsworth Holdings Limited, Quod raises several concerns with the Reg 19 Plan as policies within it do not meet the tests of soundness.</p> <p>The principal concern is that the Council has taken an overly mechanistic approach to building heights across the borough without undertaking the necessary evidence-based assessment required by London Plan Policy D9. The inflexible tall and mid-rise building zones and buildings heights proposed are not justified and restrict all buildings outside of these zones to four storeys, notwithstanding the local context or character. The policies are not based on the evidence, which is vague and this is the first opportunity for land owners to comment on the mid rise zones introduced in Policy LP4, which does not reflect early and effective engagement as required by the NPPF.</p> <p>Without modification, the approach to building heights may undermine the deliverability of the Plan. We have identified mitigating measures, through modifications, to make the policies sound, and would welcome the opportunity to work with Wandsworth Council (the 'Council') to address these prior to submission to the Secretary of State.</p> <p>3 NPPF and London Plan</p> <p>The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions.¹ All development plans in London must be in general conformity with the London Plan (2021).</p> <p>NPPF (February 2019)</p> <p>In response to the Government's commitment to delivering 300,000 homes a year by the mid-2020s, the report Fixing our Broken Housing Market was published in 2017. This report sought to make more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land. It advises that development proposals should make efficient use of land and avoid building homes at low densities, addressed the particular scope for higher-density housing in urban locations that are well served by public transport; or which offer scope to extend buildings upwards in urban areas by making good use of the 'airspace' above them. It also states that a flexible approach should be taken when adopting and applying policy and guidance that could inhibit these objectives.</p> <p>The NPPF subsequently set out policies to support the Government's objective of significantly boosting the supply of homes. It seeks a sufficient amount and variety of land to come forward where it is needed; that the needs of groups with specific housing requirements are addressed; and that land with permission is developed without unnecessary delay. It also establishes a clear policy objective to optimise surplus brownfield land in accessible locations. With regard to town centres the NPPF specifically states that minimum density standards</p>

should be adopted for town centres. The NPPF gives substantial weight and support to the development of under-utilised land and buildings where this would meet identified needs for housing.

London Plan (March 2021)

The London Plan ('LP') also recognises the importance of development in accessible town centre locations. Policy SD6 (Town Centres and High Streets) states that the potential for new housing should be realised within town centres through mixed-use or residential development that makes the best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

Policy SD7 (Town Centres – Development Principles and Development Plan Documents) states that development plan documents should identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Wandsworth Town is identified in Annex 1 as a major town centre in London with medium commercial growth classification and a high residential growth classification. Wandsworth Town should therefore be the **“focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high-quality environment”**.² Policy SD9 specifically states that Boroughs should take a proactive and partnership-based approach and support land assembly so that sites can be brought forward for development.

Policy GG2 'Making the best use of land' seeks to create successful, sustainable mixed-use places on brownfield land. The policy prioritises sites that are well-connected by existing or planned public transport and seeks to proactively explore the potential to intensify the use of land to support additional

homes and workspaces, promoting higher density development particularly in locations that are well- connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

LP Policy D3 requires all development to make the best use of land by following a design led approach and optimising site capacity. This means that development should be of the most appropriate form for that particular site. A design led approach require design options to be considered so that the most appropriate form for each site can be assessed with regard to the local circumstances, context and capacity for growth. This policy also states that incremental densification should be encouraged by boroughs to achieve a change in densities in the most appropriate way and in the context of Policy H2 (Small Sites). Where there are existing tall buildings, expansion of these areas should be positively considered by Councils, where appropriate. Policy H1 of the LP seeks to increase housing supply having identified a need for a minimum of 66,000 additional homes per year.

The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. Policy H1 requires Councils to optimise the potential for housing delivery and lists six sources of future supply. Three of these sources set out at Part B(2) of the policy (a, c and e) directly relate to the characteristics of Wandsworth High Street. Part B(2)(a) refers to locations with existing or planned public transport accessibility levels (PTAL) of 3 to 6, which are located within 800m distance of a station or a town centre. Part B(2)(c) promotes housing intensification on other low-density sites in commercial, leisure or infrastructure uses and Part B(2)(e) supports redevelopment of small sites.

These representations are made in the context of these relevant policies in the NPPF and the London Plan.

8 Early and Effective Engagement

The NPPF requires plans to be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees. The Reg 19 Local Plan consultation is the first opportunity that stakeholders have been able to review and comment on the Council's proposed approach to tall buildings (LP4 an Appendix 2). The main source of engagement we have had to date is through the pre-application process, where feedback we have received from officers as well as the council's expert design panel is entirely in contradiction to the draft plan.

Given the wider implications of this policy, it is considered that earlier and more effective engagement should have been undertaken.

The NPPF requires succinct plans which avoid duplication¹⁸. The Reg 19 Plan contains significant duplication across policies. It is a fundamental planning principle that the development plan should be read as a whole and therefore duplication across policies should be removed.

The design guidance is unnecessarily duplicated in Chapter 8 Placemaking – Area Strategies; Chapter 4 to 12 Area Strategies including the Site Allocations; and Chapter 14 Achieving Design Excellence. Inconsistencies occur where there is reference to the Council's UDS 21.

9 Summary

Wandsworth Holdings Limited are supportive in general of the Reg 19 Plan policies which seek to ensure that high quality development is delivered in the borough. However, there are fundamental flaws to some of the policies which need to be addressed:

- Policy LP4 must be assessed as a strategic policy and viability tested, given the impacts on the site allocations. We consider that this policy should be subject to viability testing against the other policies within the Local Plan (particularly the affordable housing policies);
- Flexibility should be introduced to LP4 to allow final decisions be made on quality of taller buildings at decision making stage;
- The minimum OAHN should be increased to 29,250 homes based on the London Plan annual targets for Wandsworth and considering the shortfall in delivery against this target when annualised over the past three years.

We consider that broad assumptions were made in the Whole Plan Viability Assessment (2022) and that the allocations for Wandsworth Town are not consistent with the Arup Urban Design Study (2021). Wandsworth Town is a major centre in the London wide context and in accordance with the NPPF the Local Plan should identify a minimum quantum of residential homes and commercial floorspace in compliance with the London Plan housing numbers for the borough.

We trust that the content of this letter will be taken into consideration. On behalf of Wandsworth Holdings Limited Limited, Quod reserves the right to add to or amend these representations where the Council issues new guidance or there is a change in policy at a local, regional or national level. We would be grateful if you could keep us informed of the progress of the Local Plan.

**Change(s)
considered
necessary**

**Wishes to attend
Hearing Session**

Reason why

Council Response

Comment noted. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.

Following the publication of the London Plan (post Reg 18 consultation), the Regulation 18 consultation comments and the advice of the GLA and Historic England, the council produced an updated UDS which allowed for the consideration of setting maximum heights for locations acceptable for Tall Buildings. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings. It is considered that effective engagement was carried out at all stages of the Plan.

The Whole Plan Viability Assessment has tested the cumulative impact of the Tall and Mid-rise buildings policy. The assessment concludes that the Reg 19 Local Plan is realistically deliverable. That is, its 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. Local Plan viability testing is necessarily generic, using a range of typologies and general development assumptions that are proportionate, utilising available data and importantly are not necessarily site specific. As is the case set out in guidance, and carried out by other local authorities in testing the delivery of their Local Plans and policies, the assessments are designed to test policy as opposed to being formal valuations of planning application sites at the planning application stage, normally

	carried out by the Valuation Office, Chartered Surveyors and Valuers. In this regard, the specific results of each typology may need to include additional section 106 obligations and other sites costs may allow for site mitigations that at this stage are unknown within the generic typology testing.
Proposed Change	No changes considered necessary.
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	273
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>2 107- 117 Wandsworth High Street, SW18</p> <p>Wandsworth Holdings recently became the single owner of 107-117 Wandsworth High Street, SW18 ('the Site') situated on the corner of Buckhold Road and Wandsworth High Street. The Site comprises 3no. commercial units at ground floor level, currently occupied by Ladbrokes, Tesco and Kaspas. There is 1no. residential unit above the Ladbrokes unit (117 Wandsworth High Street) and 2no. residential units above Kaspas (107 Wandsworth High Street). Until recently the Site was under multiple ownerships, but Wandsworth Holdings have recently acquired all three sites. A Site Location Plan is presented at Appendix 1.</p> <p>This is a centrally located, brownfield site in the centre of Wandsworth Town and fronting onto a strategic route. It is situated within the backdrop of the Southside Shopping Centre tall building zone (TB-G1a-01), the Ram Brewery Tall Building Zone (TB-G1d-02) and a midrise zone along the eastern boundary of King George's Park. The Site is within, but on the edge of, the Wandsworth Town conservation area.</p> <p>It is a significant site with regard to the future placemaking of Wandsworth Town and the proposed pedestrianisation of Wandsworth High Street, which is expected to be delivered by Transport for London (TfL), once funding has been approved. It is a highly visible site on the corner of two major roads and will become a transition area between the proposed pedestrianised area and the proposed low traffic public transport area along Wandsworth High Street. The Site currently benefits from high pedestrian and vehicle traffic and should be viewed as having the potential to provide a sense of arrival into Wandsworth town and with a new development contributing to new and improved public realm, which will fit in with the pedestrianisation and low traffic zone proposed for the town centre.</p> <p>However, the Site has not been viability tested through the Local Plan process and remains unallocated, along with the adjacent site to the south, which already accommodates an existing ten storey building. This means that Policy LP4, as currently drafted, restricts any development on this corner plot in a major town centre to a maximum of just four storeys.</p>

	The single ownership of the Site now provides a significant opportunity for a building of exemplary design and an enhanced public space at the front and including Hardwick Square at the rear. Any decisions on the future development of the Site should be made at planning application stage.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary.
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	274
Title	Paragraph
Number	1.12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>4 Strategic Policies</p> <p>Strategic policies are subject to the full weight of the soundness tests and set out strategic priorities and an overall strategy for the pattern, scale and design quality of places. The tests of soundness are only applied to non-strategic policies in a proportionate way³. Paragraph 1.12 of the Reg 19 Plan lists the strategic policies, including <i>inter alia</i>, Policies SDS1 Spatial Development Strategy; PM1 Area Strategy and Site Allocations Compliance; PM2 to 10 – Place-based policies for each Area Strategy; and LP41 (Wandsworth Centres and Parades).</p> <p>However, Policy LP4 (Tall and Mid-Rise Buildings) is not included, which we consider is a major omission. It is imperative that Policy LP4 is subject to viability testing against the other policies in the Local Plan (particularly the affordable housing policies), given the impacts on the site allocations and non-allocated sites which may be suitable for five or six storey development.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy LP4 is not considered to be a strategic policy in accordance with NPPF Para 20.</p> <p>The Whole Plan Viability Assessment has tested the cumulative impact of the Tall and Mid-rise buildings policy. The assessment concludes that the Reg 19 Local Plan is realistically deliverable. That is, its 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. Local Plan viability testing is necessarily generic, using a range of typologies and general development assumptions that are proportionate, utilising available data and importantly are not necessarily site specific. As is the case set out in guidance, and carried out by other local authorities in testing the delivery of their Local Plans and policies, the assessments are designed to test policy as opposed to being formal valuations of planning application sites at the planning application stage, normally carried out by the Valuation Office, Chartered Surveyors and Valuers. In this regard, the specific results of each typology may need to include additional section 106 obligations and other sites costs may allow for site mitigations that at this stage are unknown within the generic typology testing.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	275
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>5 Policy SDS1 Spatial Development Strategy 2023 - 2038 & Table 2.2</p> <p>Policy SDS1 Part A – Wandsworth Holdings object to the strategic housing target set for Wandsworth Town and for the borough as a whole. Policy SDS1 (A) sets a strategic target to provide a minimum of 20,311 new homes in the borough by 2038 (1,354 homes per annum for 15 years). This underestimates the housing need required by Table 4.1 of the London Plan which seeks 19,500 homes across ten years (1,950 homes per annum for 10 years). Across the 15-year Local Plan period this would require at least 29,250 homes.</p> <p>The supporting text to Policy SDS1 indicates that the Council has adjusted its figures due to the oversupply of housing completions achieved and forecast to be delivered up to 2026. However, the Council cannot rely on the delivery of extant planning permissions, and these completions are not guaranteed. Furthermore, the NPPF4 requires Council's to provide a <u>minimum</u> of 5 years' worth of housing against their OAHN. It is not acceptable to manually adjust down the annual housing target required by the London Plan.</p> <p>The Council has failed to deliver against the current London Plan target of 1,950 homes per year in the last three years (18/19 - 1,877; 19/20 – 1,359; 20/21 – 1,422)⁵ which indicates that planning permissions are not being delivered as expected and confirming that the Council will find it challenging to meet their housing need over the lifetime of the Local Plan. This is particularly apparent when one considers the reliance on new homes in the VNEB Opportunity Area over the past ten years.</p> <p>Table 2.2 of the Reg 19 Plan 'New Homes Distribution' indicates a capacity of 24,380 homes, which represents a short-fall against the revised 15-year target of 29,250 homes based on the London Plan annual targets for Wandsworth. The <u>minimum</u> housing requirement should therefore be revised to 29,250 homes.</p> <p>Policy SDS1 Part B - Wandsworth Holdings support the identification of Wandsworth Town within Policy SDS1 'Spatial Development Strategy' as a location with a strategic economic role and/or opportunities for regeneration. Wandsworth Holdings also support the sequential approach to locating new homes, first seeking to locate new homes in these identified locations, such as Wandsworth Town. The Council's capacity for new homes in Wandsworth Town is identified as 3,510 homes broken down to 118 on small sites and 3,391 on large sites⁶. Footnote</p>

	<p>2 of the Reg 19 Plan states that this capacity is derived from the Council's HELAA for the period 2023/24 to 2037/38. Wandsworth Holdings also support Part F of this policy which commits to supporting town centre development and regeneration.</p> <p>Given the comments made with regard to Part A of this policy, we are concerned that the proposed housing capacity of 3,315 homes in Wandsworth Town is too low. This is a major town centre in a London wide context. Limiting the majority of new homes to allocated sites significantly underplays the capacity of the town centre and is an underutilisation of accessible brownfield land contrary to paragraph 125 of the NPPF.</p> <p>In review of the Council's own evidence base, we note that the Arup Urban Design Study (2021) (UDS 21) allocates Wandsworth Town within character Area G1, which it is identified as having low - medium sensitivity whilst being a location with a higher probability of change, and therefore it is identified as a site with the highest probability for development capacity⁷. The supporting text states that these areas <i>“are the most likely to have the greatest development capacity, with a high probability of change compared against a low sensitivity, including areas such as some estates in East Putney Residential, Battersea Residential and Tooting Residential; Wandsworth Town Centre; some industrial plots within the Wandle Valley; parts of Clapham Junction Town Centre and Balham Town Centre; and Nine Elms Opportunity Area”</i>. Indeed, the area around Wandsworth High Street is included in the broad areas considered in more detail for tall or mid-rise buildings⁸.</p> <p>The capacity for new homes in Wandsworth Town, a major town centre in the London context is far higher than that proposed in Policy SDS1. The number of homes proposed for Wandsworth Town within Policy SDS1 is heavily reliant on delivery of allocated sites, and is not consistent with the London Plan OAHN for the borough. Wandsworth Town is a highly accessible, major town centre site with a PTAL 6a. In accordance with the London Plan and the NPPF, sites in the town centre should be optimised in order to allow the Council meet its <u>minimum</u> housing requirements of 29,250 homes over a 15 year period (see our comments on suggested amendments to Policy LP4).</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The housing requirement figure of 20,311 is based on the London Plan requirement for Wandsworth to 2028/2029 and a combination of the small sites target and SHLAA sites, which reflects the Plan's suggested approach to meeting housing need beyond 2029.</p> <p>The figures in the plan at para 2.104 do, in fact, show a small deficit for the years 2019-2023, but this is more than compensated for by the years prior to 2019, when completions were at a higher rate.</p> <p>The capacity for Wandsworth Town is derived from the HELAA, and the site allocations provide for much of this capacity. The HELAA sets out at section 2.5 the reasons why estimated development capacities for each individual site are not made public (and defines the approach in the remainder of part 2). Site estimates and the overall housing capacities for areas and the borough as a whole are established through a design-led approach to ensure that strategic London Plan targets for housing can be satisfied over the plan period. Individual sites will come forward over the plan period and will be able to establish much more effectively the housing numbers based on a detailed understanding of site-specific viability, deliverability and an assessment of the geographical and policy context. The figures in Table 2.2 are not intended to be a maximum number, but are indicative and will be subject to monitoring and review. Housing completions and projections will be monitored throughout the plan period.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton

Agent Organisation Details	Associate Quod
Comment ID	276
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>6 Policy LP4 – Tall and Mid-Rise Buildings</p> <p>The Council has taken an overly mechanistic approach to the allocation of tall and mid-rise building locations and heights in the Borough. This applies to Policy LP4 as a whole but Sections G and H (mid-rise building policy) results in an unnecessary limitation of four storeys on all un-allocated sites, regardless of design quality or compliance with the Local Plan as a whole. The approach is overly complex, is inconsistent with national and London Plan policies, has not been viability tested and may prejudice the ability of development sites to meet the requirements of other policies in the Plan, such as the required affordable housing levels and tenure.</p> <p>Policy LP4 and Appendix 2 of the Reg 19 Plan result in building heights which are not supported by a sufficiently robust evidence base. It is therefore not a sound approach to prescribe very detailed and inflexible building zone heights and building lines for each site allocation. The mid-rise zones are unnecessary and are not a London Plan requirement. We are concerned that the inflexible drafting of the policy will prevent the delivery of sustainable development on any unallocated site on viability grounds.</p> <p>With regard to the context of Wandsworth High Street, the UDS 21 states that mid-rise buildings are appropriate along strategic routes and in town centres. The high street is allocated in area G1(a) which is identified as having a higher probability of change than other parts of the Borough. Factors which give rise to a lower probability of change include “areas which are designated in their existing use (such as Strategic Industrial Locations), areas of open space and areas with a low PTAL score”⁹. None of these factors apply to Wandsworth High Street, further highlighting that this major town centre is not sensitive to change. The UDS 21 also states that there are opportunities for tall buildings within town centres of <i>inter alia</i> Wandsworth and “in all cases, the acceptability of individual plots will depend on specific characteristics of the site”.</p> <p>With regard to mid-rise buildings, the UDS states that mid-rise buildings will generally be concentrated within five different types of area – “(1) transition areas to tall building zones; (2) along strategic road corridors; (3) within town centres; (4) within or adjacent to existing estates; (5) alongside large scale open space”. Wandsworth High Street, which meets criteria (1), (2) and (3) has not been included in a mid-rise zone. No evidence is provided to justify the four-storey restriction in this major town centre high street, between two tall building zones and on strategic route. Policy LP4 does not recognise that there may be some circumstances, where compliance with the Plan (when read as a whole) requires flexibility to be applied for building heights and zones at the determination stage of a planning application.</p> <p>Design</p> <p>Policy LP4 prevents the opportunity for creative architecture or design solutions to allow taller buildings that may better comply with the Reg 19 policies as a whole, than the prescribed heights shown in Appendix 2. The NPPF promotes a design led approach and sets six design criteria¹³ that should be considered at plan making but also at decision making stage to ensure that developments function well, are visually attractive, are sympathetic to local character, establish a strong sense of place, optimise the potential of the site and create safe and inclusive places.</p> <p>The London Plan supports this approach under Policy D9 Tall buildings point A that “Development Plan should define what is considered a tall building for specific localities” and that this is “based on local context”. The selection of very detailed tall and mid-rise building zones and buildings heights proposed have not been justified.</p>

London Plan Policy D9 ('LP Policy D9')

London Plan (LP) Policy D9 sets a minimum requirement for tall buildings in London to be no less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This is the equivalent of 7 storey's in total. There is no requirement for buildings which do not meet these criteria to be subject to such scrutiny and it is unclear why Policy LP4 has applied Policy D9 criteria to mid-rise buildings of 5 and 6 storeys. This approach is overly burdensome and does not conform with the London Plan. LP Policy D9 requires a single tall building policy that defines zones up to 18 metres; the final height of which would be subject to detailed testing at the planning application stage.

LP Policy D9(B) 'Locations' requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan and that any such locations and appropriate tall building heights should be identified on maps in Development Plans. There is no requirement for mid-rise buildings zones to be set out within Local Plans.

LP Policy D9 explicitly requires the consideration of "other requirements of the plan"; that "locations and appropriate tall building heights should be identified on map in the development plan"; and that

"tall buildings should only be developed in locations that are identified as suitable in Development Plans". Where location and heights are prescribed in the development plan these should be informed by Part C of Policy D9 (Impacts). LP Policy D9 does not require inflexible parameter heights, nor does it require tall buildings to only be developed at the heights identified in the development plan. It does however expect a detailed analysis to be undertaken to identify appropriate locations for tall buildings.

This approach was recently tested by the Planning Inspectorate at the Brent Local Plan Review. The Report on the Examination of the Brent Local Plan 2019 -2041 published 17 January 2022 stated the following:-

The Brent Tall Building Strategy which outlined an assessment of suitable locations based on an assessment of the identified growth areas, existing building heights and townscape considerations such as protected views as well as areas with high public transport accessibility did not undertake a level of sieve analysis as detailed as that envisaged by the London Plan.

Subject to the main modifications identified, the approach to both tall buildings and the Intensification Corridors presents a sound approach which accords with both the London Plan and the Framework.

The Brent Council Tall Building Local Plan Policy BD2 was found sound on the following grounds, which included a degree of flexibility: -

It requires heights to be consistent with the general building heights shown on the plans¹⁴

The plans indicate the heights likely to be generally acceptable to the council¹⁵.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location¹⁶.

There might be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable¹⁷.

LP Policy DP9 does not require a rigid inflexible approach to tall buildings (and certainly not mid-rise buildings), and as demonstrated, a more flexible approach employed by Brent Council was deemed as sound by the Inspectors.

**Change(s)
considered
necessary**

Suggested amendments to Policy LP4

Policy LP4 states that tall buildings in Tall Building Zones would only be appropriate where the development would not result in any adverse visual, functional, environmental and cumulative impacts.

It requires planning applications for tall buildings to be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 (this comprises twenty-one criteria) and an additional nineteen local criteria set out at Policy LP4 (1 to 19). LP4 (C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and (D) proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones, and the height of tall buildings will be required to step down towards the edges of the zone (unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area). LP4(G) states that mid-rise buildings will not be permitted outside the identified tall and mid-rise building zones. LP4 (H) states that proposals for mid-rise buildings should not exceed the appropriate height identified within the relevant mid-rise building zones as identified at Appendix 2 of this Plan.

The inflexible approach to Policy LP4:

does not enable the delivery of sustainable development, particularly by limiting the potential heights of development outside of tall building zones;

is not compliant with Policy LP9 of the London Plan;

should be listed as a strategic policy and viability tested;

has not been fully consulted upon with the development industry or local communities at Regulation 18 stage.

Policy LP4 and Appendix 2 should be included within the strategic policy schedule at Paragraph 1.12, due to the strategic implications that this policy has on the Plan as a whole. The deliverability of the housing capacities resulting from LP4 should be viability tested taking into account other strategic policies of the Reg 19 Plan. Without modification, the approach to tall and mid-rise buildings and in particular the inclusion of mid-rises zone, is very likely to undermine the and deliverability of the Local Plan. Without viability testing, the policy is not consistent with national policy, is not justified and is not effective. Policy LP4 is therefore not considered to be "sound".

In our opinion, the policy for tall buildings should be retained in line with the requirements of LP Policy D9 but introduce flexibility which can be tested during the planning application process, as is the case with the Brent Local Plan.

We would suggest that the following wording is introduced as a modification: -

Heights to be consistent with the general building heights shown on the Tall Building Zone Maps.

Maps indicate the heights likely to be generally acceptable to the Council.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and deliverable when the plan is read as a whole.

Apply flexibility whereby circumstances where the quality of design of a development and its impact on character is such that tall and mid-rise buildings that exceed the general heights in these locations could be shown by applicants to be acceptable.

This would also address paragraph 14.31 which states that "Development proposals exceeding the appropriate height will not be supported on design grounds". We suggest that the following modifications are undertaken to make Policy LP4 sound:

Table 1 Suggested Amendments to Policy LP4

Policy

Reference

LP4 - Tall and Mid-rise Buildings

Proposed

C. Proposals for tall buildings should ~~will~~ not be permitted outside the Modification identified tall building zones.

D. Proposals for tall buildings should be consistent with the general ~~not exceed the appropriate~~ height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings may ~~will~~ be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.

G. Proposals for mid-rise buildings should ~~will~~ not be permitted outside the identified tall and mid-rise building zones.

Proposed

The plans indicate the heights likely to be generally acceptable to the council.

-

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and that the site allocation is deliverable when the plan is read as a whole.

Paragraph 14.31 - Development proposals exceeding the appropriate height will not be supported on design grounds unless it can be demonstrated through successfully addressing the tests in LP4(B) that there are circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.

Modification to

Supporting Text

Justification

The policy should allow a degree of flexibility so that tall and mid-rise building may be permitted outside of the designated zones in exceptional circumstances.

This is particularly pertinent to mid-rise buildings, to which the Policy D9 of the London Plan makes no allowance for the identification of non-tall building zones (i.e. mid-rise buildings) through a Development Plan.

There are several policies (including LP1 to LP3) in the Reg 19 Plan, which will inform more detailed design. LP Policy D9 does not promote the identification of mid-rise building zones and heights. We consider that the mid-rise tall building zone should be deleted, and instead any planning application of 5-6 storeys be required to meet criteria set out in other design policies of the Reg 19 Plan, which will allow a decision to be made on the suitability of the height at planning application stage.

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.</p> <p>The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	277
Title	Paragraph
Number	22.14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Whole Plan Viability Assessment (January 2022)</p> <p>The wording of Policy LP4 is intended to strictly apply so that proposals exceeding the appropriate height range will be refused on design grounds. This strategy is set out in the LBW Whole Plan Viability Assessment 10. The Whole Plan Viability Assessment (WPVA) also states “<i>For future developments, principally retail and other town centre use developments (excluding offices), where the Reg</i></p>

	<p>19 Local Plan may raise the risk of development being unviable, there may need to be provision for some flexibility to ensure a fully deliverable plan. This may include introducing flexibility in on-site and off-site developer contributions, and leaving the market to deliver the sites”11 (our emphasis). Where flexibility is applied, paragraph 8.12 of the WPVA explains that this should depend on the types of sites coming forward.</p> <p>The WPVA modelled a limited number of typologies, which used broad assumptions of development types. Some of the typologies listed in tables 7.4 – 7.9 of the WVPA are unrealistic if they are to comply with Policy LP4 and other policies within the Local Plan as a whole. Given the broad assumptions undertaken in the WPVA, and the overly constrained zones and heights applied in policy LP4, flexibility must be provided so that decisions can be made at planning application stage.</p> <p>Wandsworth Holdings commissioned Quod Development Economics to carry out a financial viability assessment of their site in Wandsworth Town Centre, against the Councils affordable housing policy. The Assessment considered a four story, six storey and 10 storey building. This report concludes that the proposed policy approach is not justified and would inhibit delivery of this specific site and prejudices the ability for the Council to effectively meet its affordable housing target and objectively assessed needs for affordable housing. The Viability Assessment is presented at Appendix 2.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. As set out in Paragraph: 003 Reference ID: 10-003-20180724 of the NPPG 'Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage.'</p> <p>In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration. LP62 (b) Planning Obligations clearly states that 'Where the Council is satisfied through an independently verified viability assessment that the provision of infrastructure and services as required in the adopted Planning Obligations SPD (or successor document) and/or identified in the Infrastructure Delivery Plan would render a scheme unviable at the point of submitting a planning application then the provision of affordable housing and necessary transport infrastructure will be prioritised.'</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	278
Title	Paragraph
Number	3.19
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Arup Urban Design Study (2021)</p> <p>The Urban Design Study produced by ARUP on behalf of LB Wandsworth provides a high-level contextual study for the whole borough and splits it up into seven places and 25 character areas. The Study considers the capacity for tall buildings within the borough: <i>“Buildings which are either 8 storeys or taller; or are 50% higher than the prevailing height of the character area defined on the opportunity map, whichever is less.”</i>¹²</p> <p>It goes on to state: <i>“within town centres and along key strategic routes there are potential locations for tall buildings, where again the acceptability of individual plots will depend on specific characteristics of the site.”</i></p> <p>For Wandsworth Town, the main site allocations are the Southside Shopping Centre (TB-G1a-01) and the Ram Brewery (TB-G1d-02). A mid-rise zone runs along the eastern boundary of King Georges Park, which meets two of the mid-rise criteria, being in the town centre (3) and adjacent to an open space (5). The buildings along Wandsworth High Street meet three of the criteria, being in a tall building transition area (1); on a strategic road (2); and in a town centre (3). The UDS sets the criteria that apply generally to all of the mid-rise building zones, which are general design guidelines that should be applied at all development regardless if they are in a mid-rise building zone, as follows:</p> <ul style="list-style-type: none"> • <i>“be carefully located and designed to step down to surrounding existing and proposed buildings.</i> • <i>respond positively and protect the setting of existing buildings in the surrounding area, including heritage assets such as conservation areas, listed buildings and locally listed buildings.</i> • <i>respect the scale, width and proportion of adjacent streets and watercourses, and local character, as outlined in the character area profiles in Section 3, including potential effects on key characteristics, valued features and sensitivities.</i> • <i>respond to the character area design guidance provided in Section 3.</i> • <i>deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development.</i> • <i>Development within town centres should include active uses and frontages at ground level.</i> • <i>incorporate an appropriate range of building heights and open spaces.</i> <p>The UDS goes on to state that the criteria is based on the site observations of the team undertaking the study and <u>are not intended to be exhaustive or detailed</u>. It is unclear why some mid-rise zones have been selected over other, more compatible zones which meet more of the criteria and consequently why so many sites in Wandsworth Town have not been selected for mid-rise development, despite meeting multiple characteristics listed as appropriate for mid-rise building zones in the UDS 2.</p> <p>For example, Wandsworth High is a strategic route, in a town centre with PTAL 6a. Sites along this strategic route are not considered suitable for development above four storeys, despite proximity to Southside Shopping Centre which is in the backdrop and setting of the high street being allocated for up to 20 storeys (90 metres). The Ram Brewery site which is also in the backdrop of the high street is allocated for 10 storeys (30 metres) with an extant planning permission for a 36-storey building. Wandsworth High Street sits in between these two tall building zones but Policy LP4 limits development to four storeys. The consequence of this is that a significant number of sites will be prevented from delivering sustainable development due to the inflexible restriction of four storeys.</p> <p>Wandsworth High Street is located in sub-area G1a. The Wandsworth Town and Common Opportunity Map does not include mid-rise and tall buildings already present within its townscape. The supporting text acknowledges that sub-areas G1b, G1c and most of G2 is considered inappropriate for tall buildings. Sub-areas G1, G1a and G1d are considered to have the potential for tall buildings subject to addressing set criteria which relates to its context.</p> <p>There is very little mention of the character created by these existing tall buildings in the UDS 21, despite there being an acknowledgement that they form an important character to the town centre. In particular, the report fails to recognise locations where tall buildings are consented and being built out, the 36 storey Ram Brewery development is the most obvious example (TB-G1-03).</p>

An analysis of the consented or built out tall buildings within Wandsworth Town above 10 storeys are summarised below.

36 storeys (+ 12 storeys buildings) – Ram Brewery (Greenland)

27 storeys – Mapleton Crescent (Pocket) 2015/5777

26 storeys – Wandsworth Exchange (L&Q) 2014/5149

25 storeys - Sudbury House

22 storeys - Argenton Tower, Maplton Road (Barratt) 2002/3275

3 x 22 storeys - Neville Gill Close

21 storeys – Enterprise Way (Barratt) 2009/3017

20 storeys – The Light Bulb, Filament Walk

20 storeys – Pencil Tower, 86-96 Garratt Lane (Baylight Properties) 2017/0535

17 storeys – Buckhold Road, Wandsworth 2013/4653

17- 8 storeys - Former Homebase (L&G) 2020/0011

15 and 3 x 11 storeys - Wandsworth Riverside Quarter Phase 3 (Fraser Group)

15, 12, 12 storeys - Wandsworth Riverside Quarter Phase 2 (Fraser Group)

15 – 8 storeys - Former B&Q (L&G) 2019/4583

14 and 10 storeys – Former Linton Fuels, Osiers Road (Taylor Wimpey) 2016/6164

14 and 10 storeys - 9, 11 and 19 Osiers Road (Hollybrook Limited) 2018/3709

10 storeys – 29 Hardwicks Square

10 storeys – 4 Buckhold Road

3 x 10 storeys - Osiers Square, Osiers Road (Taylor Wimpey) 2014/6746

	<p>Wandsworth Holdings commissioned Neaves Urbanism to carry out an independent Townscape Analysis and review of the UDS21, which is presented at Appendix 3. This review concludes that the draft policy LP4 Tall and mid-rise Buildings within G1: Wandsworth Town and Riverside does not completely reflect the findings of the Urban Design Study nor does it respond to its current mid-rise and tall buildings context. The tall building zone shown in Map 23.26 of the Local Plan does not reflect Wandsworth Town and Common Opportunity Map Figure 252.</p> <p>The draft policy also does not consider the areas current mid-rise and tall buildings context. This includes mid-rise buildings between five and ten storeys being present within the Ram Quarter with an extant consent for a 36 storey building, and Hardwick Quarter, along with taller buildings such as the Bronze Building and Jacquard Apartments of up to 27 storeys being present to the south of the town centre.</p> <p>The Urban Design Study states that the ability of the sub-area to accommodate tall buildings is “... limited by the cumulative effects of existing and recent developments and the modest scale of the town centre around Wandsworth Town Conservation Area.” However, the potential cumulative effects should be considered on a site-by-site basis based on the criteria set out within the London Plan’s Policy D9 Tall buildings point C.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The mid-rise building policy approach of LP4 Part E is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.</p> <p>The tall building opportunity area zone maps of the UDS are a result of the detailed analysis of the Urban Design Study which includes an analysis of existing buildings and extant permissions. The character area summaries and criteria describe the various constraints that have been taken into consideration as part of the setting of tall building zones. Some of the existing tall buildings threaten the historically small-scale character of Wandsworth Town and therefore the tall building zones and their shading have been set with the aim to prevent further inappropriate building heights in relation to the design led approach.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	279
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>7 Chapter 3 Placemaking – Area Strategies Policy PM2 Wandsworth Town</p> <p>PM2A – Placemaking</p> <p>PM2.A.1 - Wandsworth Holdings support PM2A1 (a-h), in particular the ambition to provide an appropriate mix of activities in Wandsworth High Street and promoting height and massing that either reflects local character or conforms with the approach for tall buildings in Wandsworth Town. Part (b) of this policy provide some flexibility with regard to height and massing and allows place makers to take account of the local character of an area when considering the height and massing of a development, even if a site is not within a tall or mid-rise buildings zone. This is fully supported by Wandsworth Holdings.</p> <p>PM2A.3 – Wandsworth Holdings fully support the approach to ensure that development proposals help to maximise opportunities provide by the Wandsworth gyratory proposals. Implementation of the TfL proposals will ensure that the placemaking aspirations for Wandsworth Town are met.</p> <p>PM2A.5 – Wandsworth Holdings object to the inflexible approach towards tall and mid-rise buildings in Wandsworth Town. See our comments on policy LP4. This should be removed to allow for greater flexibility and creativity in design solutions.</p> <p>PM2A.9 – Wandsworth Holdings support the approach to take advantage of opportunities to create high quality public realm to be enjoyed by the public.</p> <p>PM8B. Inclusive Growth</p> <p>PM2B.1 – Wandsworth Holdings object to the housing target for Wandsworth Town. Please see our objections made to Policies SDS1 (Part A) and LP4.</p> <p>PM2B.3(b) – Wandsworth Holdings object to this part of the policy which promotes a blanket ban on amalgamation of small retail units on Wandsworth High Street. There is no reasoning behind this restriction, when traditional shopfronts can be provided with internal amalgamations to allow a single occupier operate the units.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Criteria PM2 A1 (b) is proposed to be deleted as it could cause confusion with the interpretation of Policy LP4 and criteria PM2 A5 which is how the approach to tall and mid-rise buildings should be applied.</p> <p>This reference is not contained in any of the other area strategy policies. PM2 A. 5. already states that 'Development proposals for tall or mid-rise buildings in Wandsworth Town will only be supported in zones identified in Appendix 2. Any proposal for a tall or mid-rise building will need to address the requirements of Policy LP4 (Tall and Mid-rise Buildings) as well as other policies in the Plan as applicable.' This part is consistently repeated in each Area Strategy which clarifies the approach.</p>
Proposed Change	<p>Amend criteria of PM2 A. 1. b. and amend policy numbering.</p> <p>b. height and massing reflect local context, or conforms with the approach for tall buildings in Wandsworth Town;</p>
Consultee Full Name	Wandsworth Holdings Limited
Consultee Organisation Details	
Agent Full Name	Ms Angie Fenton
Agent Organisation Details	Associate Quod
Comment ID	280
Title	Wandsworth Town Place Performance
Number	Figure 4.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Map 4.1 Spatial Area Map – Wandsworth Town</p> <p>The key should be amended to provide more clarity. Existing public spaces such as King George's Park are shown as proposed new public open space.</p>

	The main shopping area allocation is limited to Southside Shopping Centre. There are multiple retail units west of Southside Shopping Centre, along Wandsworth High Street which should be included as part of the main shopping area.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Please note that Map 4.1 seeks to indicatively demonstrate the development aspirations of the Area Strategy, rather than to represent a prescriptive scheme. The retail units on Wandsworth High Street are designated as 'Other Frontages', which provide them with certain policy protections in that capacity. Southside is identified as 'Core Frontage', which is why it has been included on Map 4.1. Please see Appendix 3 Designated Frontages for more detail, as well as policy LP42 Development in Centres.</p> <p>The existing public spaces are captured in a different shade to the proposed ones.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Mark Broxup
Consultee Organisation Details	General Manager Western Riverside Waste Authority
Agent Full Name	ms niamh burke
Agent Organisation Details	Carter Jonas
Comment ID	281
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes

Details of reason(s) for representation	These representations are submitted on behalf of the Western Riverside Waste Authority (WRWA) to the draft Local Plan (the draft Plan). These should be read alongside those submitted by the Cory Group who operate two facilities in the borough on behalf of the WRWA, in particular those elements explaining how Cory and the WRWA are committed to improving the operational and environmental performance of the existing facilities in the borough through renewal, upgrade and development options at both locations. Introduction - The WRWA was established in 1986 as an autonomous statutory local government body to undertake the waste disposal functions prescribed by the Local Government Act 1985 and the Waste Regulations and Disposal (Authorities) Order 1985. The WRWA is responsible for managing the waste collected in the London Boroughs of Hammersmith and Fulham, Lambeth, Wandsworth and the Royal Borough of Kensington and Chelsea. The WRWA is responsible for the reuse, recycling and recovery of energy from around 400,000 tonnes per annum of municipal waste collected by its constituent councils. The WRWA minimises the impact of this essential public service by utilising its riparian transfer stations to transport the residual waste (that which cannot be reused or recycled) by river for treatment which removes around 100,000 HGV movements a year from London's congested roads. The WRWA own two waste transfer stations, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. The Smugglers Way site also incorporates an 84,000 tonne per year Materials Recycling Facility and a 20,000 tonne per year Household Waste and Recycling Centre. Both sites are currently operated by Cory Environmental Ltd trading as Cory. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan. Cringle Dock is allocated for residential-led mixed use development above, within the Wandsworth Site Specific Allocations Document (adopted March 2016). On behalf of the WRWA, we provide our representations to the draft Local Plan (the 'draft Plan') below.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The WRWA owns two waste transfer stations in the Borough, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan and also within the draft Plan. The WRWA do not find the policies in the draft Plan relating to the two sites to be sound and therefore consider it necessary, as significant landowners in the Borough, to participate in the hearing sessions at the Examination in Public. We ask to be notified about future hearing sessions in due course.
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr Ben Wrighton
Consultee Organisation Details	Strategic Planning Director Watkin Jones Group
Agent Full Name	James Ainsworth
Agent Organisation Details	Planner Montagu Evans LLP
Comment ID	282
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>WANDSWORTH LOCAL PLAN: PUBLICATION DRAFT LOCAL PLAN (REGULATION 19) REPRESENTATIONS ON BEHALF OF WATKIN JONES PLC</p> <p>We write on behalf of our client, Watkin Jones PLC (the “Client”) who have instructed us to make written representations in relation to the Publication Draft Local Plan (“Draft Local Plan”) which was published on 4 January 2021 for consultation 2021 until 28 February 2022.</p> <p>By the way of background, in February 2021, we made representations on behalf of our Client in the consultation on the Draft Local Plan (Regulation 18 version). A copy of the Regulation 18 representations can be found in Appendix 1. We have also been progressing with pre-application discussions with both the London Borough of Wandsworth (“LBW”) and the Greater London Authority (“GLA”) in relation to our Client’s proposals for the redevelopment of its site (“the Site”) on Battersea Park Road (41-49 and 49-59 Battersea Park Road) for mixed use development comprising Purpose Built Student Accommodation (“PBSA”), housing and flexible commercial and community uses.</p> <p>About Watkin Jones PLC</p> <p>Watkin Jones are a leading provider of ‘residential for rent’ property. With increasing pressure on many areas to quickly create new housing, WJG an excellent track record of delivering homes fast without compromising on quality. Over 95% of its developments are on site within six months of the grant of planning permission and its in-house construction capacity means that it can rapidly boost local housing supply. Over the last 25 years WJG have delivered over 43,000 student beds across 130 sites, with a pipeline of over 12,300 BTR, student or co-living homes currently. It has delivered, or is currently delivering, over 5,000 units within London.</p> <p>Today, WJG successfully works across every part of the UK and closely engages with local authorities, neighbours, and a wide range of relevant stakeholders to focus on investing in central brownfield sites that make the best use of land, and create high quality, appropriately designed places. Its end-to-end delivery model means that it acquires, designs and build places, and often stays to manage them as a valuable long-term member of the community.</p> <p>Fresh is its multi award-winning operator and manager of residential for rent schemes and works on behalf of a wide range of clients, managing over 20,000 rental homes and student bed spaces at over 60 sites across the UK and Ireland. Fresh achieves 95% customer satisfaction, and cares for its residents with a range of wellbeing and community building activities.</p> <p>Scope of Representations</p> <p>Our Client’s representations are focussed towards the land use policies in the Draft Local Plan relevant to the sectors that it operates in. As such, the representations focus primarily on the following policies:</p> <ul style="list-style-type: none"> • Draft Allocation NE2 - 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8; • LP23 – Affordable Housing; • LP28 – Purpose Built Student Accommodation; • LP29 – Housing with Shared Facilities; and • LP30 – Build to Rent.

These are addressed in turn along with our proposed recommendations to the policies to ensure that the Plan as a whole meets the tests of soundness established by Paragraph 35 of the National Planning Policy Framework (“NPPF”). For the avoidance of doubt, Plans are ‘sound’ if they are:

- 1 a) *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;*
- 1 b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- 1 c) *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*
- 1 d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

Closing Remarks

We trust that our Client’s representations on these aspects of the Draft Local Plan are of assistance to the Council in making the Draft Local Plan sound in the context of the NPPF and will be taken into account to inform the Submission version of the Plan. Our Client would be more than willing to meet with officers should they have any points of clarification. In the meantime, please do not hesitate to contact Simon Marks, Sam Stackhouse or James Ainsworth of this office if you have any queries.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Mr Ben Wrighton
Consultee Organisation Details	Strategic Planning Director Watkin Jones Group
Agent Full Name	James Ainsworth
Agent Organisation Details	Planner Montagu Evans LLP
Comment ID	283
Title	NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8
Number	Statement 28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Draft Allocation NE2 - 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8</p> <p>As currently drafted, Draft Allocation NE2 states the following:</p> <p>Draft Allocation NE2 - 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8</p> <p><u>Site Description</u></p> <p>5.42 This site is south of the A3205 (Battersea Park Road) and extends south to the train tracks that bisect Nine Elms. To the east of the site is 'A Road' which separates it from Covent Garden Market and to the west is Sleaford Street. Currently the site comprises Booker Wholesale Cash and Carry to the north west of the site. Site Area: 0.81ha.</p> <p><u>Site Allocation</u></p> <p>5.43 Mixed use development, including residential and business uses, with frontages onto Battersea Park Road, Sleaford Street and the street adjacent to New Covent Garden Market. Development should include the creation of a boulevard to the east of the site that provides links further north and is a pleasant place where all users can be accommodated in a balanced way.</p> <p><u>Development Considerations</u></p>

5.44 **Uses** - A high-quality, mixed-use development would be appropriate with street frontages on to Battersea Park Road, Sleaford Street and the street adjacent to New Covent Garden Market. Suitable ground floor uses include independent shops and businesses, emphasising local makers and artisans and complimenting the incubator units being delivered as part of the neighbouring Sleaford Street site.

5.45 **Access** - Pedestrian entrances to ground and upper floor uses should be directly from the surrounding streets.

5.46 **Parking** - A car club should be provided for residential/commercial use and surrounding area.

5.47 **Public Transport** - Opportunities should be taken to enhance bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors. Proposals will be required to provide road space along with financial contributions to design and construct TfL's Nine Elms Corridor proposal which will deliver consistent bus infrastructure. Developers will be expected to bring forward improvements such as the upgrading of the signalised junction of the CGMA/BPR/Pump House Lane junction or to fund improvements if these are to be delivered as part of the Nine Elms Corridor Scheme.

5.48 **Active Travel** - Improve north-south active travel links including to the Thames riverside. Proposals should make improvements to Sleaford St, including ensuring a usable footway width on the eastern side, as it is currently of a sub- standard width. To the south, the site should ensure the continuation of the east-west cycle route along the viaduct, and the potential cycling and walking bridge across the CGMA access road, including land access.

5.49 **Relationship with other allocated sites** – The New Covent Garden Market access road to the east of the site (NE12) is primarily used for overnight market operations so development proposals should consider this and how it will be maintained, mitigation of impacts on residential uses and the enhancement of the urban realm in that area. Ensure that any development does not have a detrimental impact on the security and operation of the existing MPS facility (site allocation NE4) so long as it remains in use as an MPS facility.

5.50 **Address social, economic and environmental disparities** - The Cultural Strategy for the site should give specific consideration to how it contributes to the Food and Horticultural Quarter, linking with the proximity to the New Covent Garden Market site (NE12).

Design Requirements

5.51 **Built Form** - Improve frontages, public realm and signage along Battersea Park Road/Nine Elms Lane. Active building frontages on to Nine Elms Lane, Sleaford Street and the entrance road into the market site should be provided.

5.52 **Movement** – Establish a wayfinding strategy, connecting and promoting active use of new public spaces through integrating facilities and events. Enhance the pedestrian crossing across Nine Elms Lane and on to the riverside. Proposals should also improve pedestrian connections between the new Nine Elms Park and the existing residential estates to the south-west. This scheme will be expected to contribute TfL's Nine Elms Corridor scheme which provides a holistic approach to transforming Nine Elms Lane.

5.53 **Context** - The north-east corner of the site is the transition between the Thessaly Road and Park Side neighbourhoods. It has the potential to act as the 'entrance' to the park for people coming from the Thessaly area to the west and to the Thessaly neighbourhood for those travelling from the Park.

5.54 **Nature** – Tree planting and other green features should be incorporated to the eastern edge of the site to help create green corridors from the Nine Elms Park to other green and blue infrastructure.

5.55 **Building heights** - In accordance with the tall building maps in Appendix 2, the site is located in tall building zone TB-B3-01. The maximum appropriate height range for the zone is 8 to 25 storeys, and the maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid- rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).

Site Description / Context

Firstly, we welcome that the site allocation seeks to combine the Bookers site and the BMW site into one single site allocation as under the current development plan, both uses have separate allocations. However, Paragraph 5.42 only references the “Bookers” element of the Site and does not include reference to the southern part of the Site currently occupied by BMW. We assume that this has been missed following the combination of the two allocations and therefore request that the description is updated to account for this.

We note that the redline boundary used for the Site is outdated and does not reflect the current ownership boundary / extant planning permission boundary. As such, we request the plan is updated to reflect the redline boundary at **Appendix 2**.

5.43 Site Allocation

As noted in National Planning Guidance, student accommodation contributes to overall residential housing need, indeed, supporting paragraph 4.15.1 of the London Plan states that the housing need of students in London, whether in PBSA or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London’s overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London’s housing need as established by paragraph 4.1.9 of the London Plan. The completion of new PBSA therefore contributes to meeting London’s overall housing need and is not in addition to this need. As such, it is important to consider the addition of PBSA in the context of overall housing need.

Whilst student accommodation falls under the overall “umbrella” of residential use, given the advanced discussions that have taken place between Watkin Jones and the Council in relation to a PBSA scheme on the Site, and formal pre- application response from LBW, we request that the allocation is updated so that it is explicit that student accommodation is appropriate on the Site in addition to residential use.

5.47 Public Transport

The proposed road improvements fall outside of the red line boundary of the allocation and outside the ownership of the landowner. As such, we do not envisage that the development would be required to facilitate this. During pre-application discussions with TfL, we understand that works are progressing on improving the Battersea Park Road junction where it connects with Pump House Lane and the New Covent Garden Market Access road. Our client is supportive of such works which it considers will improve general pedestrian experience and safety in the locality.

Therefore, since this work is already being progressed by TfL, we suggest that the requirement for “developers” to provide contributions and to deliver the forthcoming road improvements is removed from this paragraph. This should be replaced with the requirement for “developers” to continue working collaboratively with TfL.

5.48 Active Travel

Our Client welcomes the requirement to make improvements to Sleaford Street as part of future development proposals and considers that the proposed development will provide an opportunity to provide greater active frontage on the western side of Sleaford Street.

Our Client can also confirm that the south of the Site will be safeguarded to facilitate the east-west cycle route along the viaduct, in line with the extant permission on the Site. However, we would question whether access to the cycle route should be made available from our Site given how close the Site is from Thessaly Road which we understand will be the primary access point for the east-west cycle route.

	As such, we suggest that the land access requirement is removed from this paragraph since primary access is already provided adjacent to the Site.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. The site description is considered accurate and does not need to change as the BMW site is permanently closed.</p> <p>The site allocation boundary could be updated to match the current ownership boundary / extant planning permission boundary and the site size.</p> <p>Student accommodation is already covered by the residential description of the site and is acknowledged to contribute to overall housing need. Student accommodation should meet the requirements of other policies of the plan, notably LP28. It would not be appropriate to specifically single out this site for student accommodation over others.</p> <p>Developers will be expected to contribute towards the proposed improvement works as agreed once a proposal is submitted to the Council and TfL have been consulted on what level on contribution they would be expected to make.</p> <p>Paragraph 5.48 is considered sound and does not require amendments.</p>
Proposed Change	<p>Amend the following maps as follows:</p> <p>Map 3.2 Site Allocation Map - amend map to show updated boundary of NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.</p> <p>Map 5.1 Creative Clusters Map - amend map to show updated boundary of NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.</p> <p>Map 5.2 Nine Elms Spatial Area Map - amend map to show updated boundary of NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.</p> <p>Map 5.3 Kirtling Street Cluster. Spatial Area Map - amend map to show updated boundary of NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.</p> <p>Picture 5.5 Kirtling Street Cluster Site Allocation Map - amend map to show updated boundary of NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.</p> <p>See appendix 1 for illustrated changes to this map.</p>
Consultee Full Name	Mr Ben Wrighton
Consultee Organisation Details	Strategic Planning Director Watkin Jones Group
Agent Full Name	James Ainsworth
Agent Organisation Details	Planner Montagu Evans LLP
Comment ID	284
Title	LP28 Purpose Built Student Accommodation
Number	Policy 39
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP28 – Purpose Built Student Accommodation</p> <p>As currently drafted, Draft Policy LP28 states the following:</p> <p>LP28 – Purpose Built Student Accommodation</p> <p>1 Proposals for Purpose Built Student Accommodation will be supported where the development:</p> <p>1 1. meets all requirements for student accommodation, including affordable provision through the threshold approach, as set out in London Plan Policy H15;</p> <p>2 2. is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth;</p> <p>is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood.</p> <p>1 4. has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;</p> <p>2 5. would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure;</p> <p>1 6. provides a high-quality living environment, including the provision of appropriate space standards and facilities, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and</p> <p>2 7. provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users.</p> <p>1 The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements. Proposals for a change of use of existing student accommodation which result in the net loss of residential floorspace will only be permitted when:</p> <p>1 1. the loss of student accommodation would be solely at ground floor level; and</p> <p>2 2. the development would replace the ground floor student accommodation with active ground floor uses;</p> <p>and</p> <p>1 3. the proposed ground floor uses would pass the sequential test for main town centre uses in accordance with LP43 (Out of Centre Development).</p> <p><u>A.1. meets all requirements for student accommodation, including affordable provision through the threshold approach, as set out in London Plan Policy H15</u></p> <p>Whilst Part A.1. of Draft Policy LP28 refers to “all” requirements of H15, since specific reference is being made to the “threshold approach”, we suggest that reference is also made to viability testing and engagement with HEPs. Accordingly, part A4 which states the following should be included:</p>

- 1 a. "to follow the Fast-Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution
- 2 b. where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E.
- 1 c. the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation"

A.2. is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth

It should be noted that London Plan Policy H15 part A.3. states

"The majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider."

As such, nomination agreements are already required for the majority of the bedrooms and therefore the above addition is unnecessary. Indeed, this existing London Plan Policy provision already deters speculative student applications and ensure that applications that come forward are driven by demonstrable need. Furthermore, our concern with the current wording of Part A.2. is certain cases, it is unlikely that it will be possible to present evidence of a 'linkage' (a phrase which has the potential for wide interpretation) with a HEP at the time a planning application is submitted. Whilst letters of support can potentially be obtained by HEPs to demonstrate that there is an in-principle support for the proposed development, a HEP will not enter into contract with a provider until way after planning permission has been granted and until a point where there is greater certainty on the quantum of bedrooms being delivered and the academic year that the development will be available from, the latter of course being influenced by construction of the development. This is clearly set out in the notes of the Mayor's Academic Forum available on the GLA's website. As currently worded, the requirement that a planning application for PBSA is supported with a linkage with a HEP is unnecessary if the London Plan Policy H15 is to be followed. As such, this element of the policy is not positively prepared, justified, or effective.

Further the requirement for a HEP to be based in Wandsworth is unnecessary as the London Plan is clear that London Boroughs have a role to play in meeting a pan-London strategic need. PBSA need only be restricted to locations with good accessibility to public transport and services. This geographical provision in draft policy should also be deleted as being unnecessary and not in accordance with the adopted London Plan.

Identified need in the London Plan and the Wandsworth Local Housing Needs Assessment

We note that the beginning of the policy does not include our request in our Regulation 18 Representations to specify the need identified in the London Plan and the Wandsworth Local Housing Needs Assessment.

We maintain that our Client's general observation is that the Policy does not provide a clear strategy to meet the demand for student accommodation identified in the London Plan (2021) and the Wandsworth Local Housing Needs Assessment (2020). Indeed, Paragraph 4.15.2 of the London Plan states that there is a requirement for 87,500 (3,500 annualised over 25 years) PBSA bed spaces but does not provide specific Borough targets. Furthermore, the Local Housing Needs Assessment identifies a need for circa 788 student bed spaces between 2018-2019 and 2024-25 to meet the planned growth associated with the University of Roehampton and a further need for 41 bed spaces to meet the planned growth associated with St George's – University of London over the same six-year period.

On the basis of the above, we consider that there is not a robust or effective strategy in place which can be relied on to meet the identified student housing needs of the universities in the Borough, since specific sites have not been identified to deliver the above need. Furthermore, there is also no attempt to meet the strategic student housing needs of London, which Wandsworth, as a London Borough, is required to plan for in accordance with the London Plan (2021). As an Inner London Borough with good public transport accessibility and short journey times to a number of London's Higher Education Institutions, it would be reasonable to expect that the Borough would make a significant and sustainable contribution to meet the strategic London requirement. As a general comment therefore, we recommend that Draft Policy LP28 is amended to ensure the Plan has been positively prepared and is effective. The

Policy must specifically recognise and positively address the strategic need for student accommodation identified by the London Plan and the Local Housing Needs Assessment, and we also recommend that the Draft Local Plan considers the allocation of specific sites to meet the unmet local student housing need as a minimum.

1 5. would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure

As requested in our Regulation 18 Representations we note that the wording of this section has been updated to provide clarity on the measure of over-concentration, namely confirming that the “neighbourhood level” is considered to be within an 800 metres radius of a site and that “single person accommodation” is defined as all types of non-self-contained dwellings (such as student accommodation and HMOs) and self-contained studios.

Firstly, the Plan does not make clear the planning purpose behind this part of the policy. However, whilst we welcome the clarity as it provides an insight into how the Council will assess PBSA applications, a quantitative approach is only one measure of assessing overconcentration and it has its limitations as a one-size fits all tool. For example, in a high density part of the Borough such as Vauxhall and Nine Elms, the cumulative impacts of single person accommodation within in an

800 metres of the site are likely to be much less profound than they would be in more suburban parts of the Borough, as there would a number of intervening other uses to contribute to a mixed and balanced community and which would effectively dilute the proportion of single person accommodation in an area as percentage of other uses. We therefore consider that it should be recognised that this element of the policy will be applied flexibly and as a guide, rather than a requirement.

We also question the inclusion of self-contained studios into the definition of “single person accommodation”. Whilst we agree that studios are typically occupied by single people, they are a C3 conventional housing product and appeal to a different market to specialised accommodation such as PBSA. We therefore consider that it is unreasonable to count both together under the assessment of overconcentration as they are not similar uses in terms of the profile of residents that occupy them, or the periods of occupation. We also note that occupants of studios, like any other unit sizes within Class C3, are required to pay Council Tax and therefore it is unjustified to suggest that the studios place undue pressure on local infrastructure. We also note that the Borough has a CIL charging schedule in place so, in theory, any development that comes forward, whether that be PBSA or Class C3, will contribute to local infrastructure with the Borough responsible to ensure that any squeeze on infrastructure is alleviated.

In addition to the above, we note that in some areas there are already high levels of HMOs, and since they are included in the assessment, this may result in an “over-concentration” being concluded. In turn, this would make it difficult for the Council to readdress the challenge of high levels of students occupying HMOs. Instead, this policy should seek to encourage the delivery of PBSA to free up housing stock that can delivery family sized housing and we therefore suggest it is updated to remove HMOs from the over-concentration assessment.

1 6. provides a high-quality living environment, including the provision of appropriate space standards and facilities, well - integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation)

As requested in our Regulation 18 Representations we note the size requirements have been amended from “good” to “appropriate space standards”. We support this change since it allows the decision-maker to draw on precedent developments with a view to understanding what the market expectation is for room sizes.

However, we maintain our recommendation that “natural ventilation” is replaced with “ventilation” as there are instances where mechanical ventilation is a more suitable alternative to natural ventilation, particularly when there are local noise and / or air quality constraints in highly accessible environments.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)

Reason why	
Council Response	<p>Comment noted.</p> <p>The policy includes a reference to London Plan Policy H15. It is not necessary to repeat elements of H15 within the local plan.</p> <p>'Linkage' is defined in the supporting text of Policy LP28. The purpose of the criterion is primarily to ensure that students are not disadvantaged by unreasonable travel times and disproportionate travel costs. Making reference to a linkage to establishments within or close to Wandsworth is therefore justifiable.</p> <p>Whilst there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed, the Local Plan ensures that the occupiers of the development have an opportunity to get to the educational establishment it is linked to. This is necessary to ensure that students are not disadvantaged by unreasonable travel times and disproportionate travel costs. Reference to establishments within or close to Wandsworth is therefore justifiable. The policy does not limit the agreement only to Wandsworth.</p> <p>The London Plan does not break down the strategic need for PBSA as the location of this need will vary over the plan period. The Local Plan accommodates student accommodation in the borough through a positive policy which seeks a linkage to HEPs.</p> <p>Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services</p> <p>As set out in London Plan Policy SI4, both natural and mechanical ventilation are accepted as means of providing mitigation for overheating, but natural ventilation is favoured. It is considered that the reference in this plan to natural ventilation is justified in the context of Policy SI4.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Mr Ben Wrighton
Consultee Organisation Details	Strategic Planning Director Watkin Jones Group
Agent Full Name	James Ainsworth
Agent Organisation Details	Planner Montagu Evans LLP
Comment ID	285
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP23 – Affordable Housing</p> <p>As currently drafted, Draft Policy LP23 states the following:</p>

LP23 Affordable Housing

1 The Council will seek to maximise the delivery of affordable housing in accordance with the London Plan. This will contribute to securing the Mayor's strategic target of 50 per cent of all new homes to be affordable.

1 Development that creates 10 or more dwellings (gross) on individual sites must provide affordable housing on-site in accordance with the threshold approach set out in London Plan Policy H5.

1 The Council will require an affordable housing tenure split of 50% low-cost rent products, 25% First Homes and 25% other intermediate products. A minimum discount of 30% will be applied to First Homes.

1 Affordable housing will be required on site. Off-site provision of affordable housing will only be accepted in exceptional circumstances where it can be clearly demonstrated that affordable housing cannot be delivered on-site or where it can be demonstrated that off-site provision on another site in the borough would better deliver the creation of mixed and balanced communities than through on-site provision. Applicants will be required to identify a site(s) which would be acceptable for the development of affordable housing. In exceptional circumstances when it is clearly demonstrated to the Council's satisfaction that an alternative site cannot be identified will the payment of a financial contribution to support the delivery and supply of affordable housing on another site in the borough be considered. The provision of affordable housing on another site(s) will be at least equivalent to the increased development value if affordable housing is not provided on-site and will be provided prior to, or tied to, the completion of the on-site market housing, subject to such a contribution being viable. Further guidance will be provided in the Planning Obligations SPD.

. Site-specific viability information will only be accepted in exceptional cases, as set out in Policy H5 of the London Plan. The Council will undertake an independent review of that assessment for which the applicant will bear the cost. Review mechanisms will be required in accordance with the approach set out in the London Plan and relevant Supplementary Planning Guidance.

1 The management of the affordable housing provided (other than in Build to Rent schemes and in relation to First Homes) should be undertaken by a Registered Provider which is a Preferred Partner of the Council, unless otherwise agreed by the Council. Any relevant scheme will need to demonstrate that the design, siting and phasing of affordable homes provides for its proper integration and timely provision as part of the wider development.

1 G. The application of the Vacant Building Credit (VBC) is not appropriate in Wandsworth. The use of VBC will only be considered in limited circumstances, where applicants clearly demonstrate there are exceptional reasons why it is appropriate, and all of the following criteria are met:

- 1 1. The building is not in use at the time the application is submitted.
- 2 2. The building is not covered by an extant or recently expired permission.
- 3 3. The site is not protected for alternative land use.
- 4 4. The building has not been made vacant for the sole purpose of redevelopment

1 The provision of affordable housing or financial contributions will be sought from any development making provision for new dwellings or the provision of residential accommodation with shared facilities.

	<p>We welcome the specification in Part F, that the affordable units for BTR do not have to be managed by a registered provider which is a Preferred Partner of the Council.</p> <p>As per our Regulation 18 Representations, we agree with this approach since we suggest that on-site affordable housing could be operated under the same management as market housing and secured on a Discount Market Rent (DMR) basis controlled by rent levels associated with London Affordable Rent and London Living Rent.</p> <p>Our view, is consistent with the Glossary of the NPPF, which states that landlords of BTR schemes do not need to be a registered provider, and London Plan Policy H11 which states there should be “<i>unified ownership and unified management of the private and Discount Market Rent elements of the scheme</i>”. This therefore allows the provision of market and affordable to be provided in the same building in an integrated manner.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support noted.</p> <p>Whilst no change is required in respect of this comment, the opening sentence of criterion (f) has been clarified to cover all incidences of affordable housing products where RP involvement is not required.</p>
Proposed Change	<p>Amend at criterion (), line 1, delete, 'The management of the affordable housing provided (other than in Build to Rent schemes and in relation to First Homes) it should be undertaken by a Registered Provider which is' and replace with, '<u>Where a Registered Provider is required for the management of affordable housing, it should be undertaken by</u>'.</p>
Consultee Full Name	Mr Ben Wrighton
Consultee Organisation Details	Strategic Planning Director Watkin Jones Group
Agent Full Name	James Ainsworth
Agent Organisation Details	Planner Montagu Evans LLP
Comment ID	286
Title	LP29 Housing with Shared Facilities
Number	Policy 40
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

**Details of reason(s)
for representation**

LP29 – Housing with Shared Facilities

As currently drafted, Draft Policy LP29 states the following:

LP29 – Housing with Shared Facilities

1 Development proposals for new Houses in Multiple Occupation (HMOs) will be supported where they:

1 1. do not result in the loss of housing suitable for occupation by families as defined in Part A of Local Plan

Policy LP26 (Conversions);

1 2. do not result in an overconcentration of HMOs and other single-person accommodation at the neighbourhood level;

2 3. do not give rise to adverse impacts on the amenity of the surrounding properties and the character or the neighbourhood, including as a result of cumulative impacts;

3 4. have access to good levels of public transport (PTAL 4 or higher), and to shops and services appropriate

to the needs of the intended occupiers; and

1 5. provide a good quality of accommodation, in line with Policy LP27 (Housing Standards). B. Development proposals that result in the loss of an HMO will be resisted unless:

2 1. it can be demonstrated that the existing building does not meet the appropriate standards for an HMO

and has no realistic prospect of meeting the standards; or

1 2. adequate replacement provision can be secured within the borough, having regard to the requirements of

Part A above, such that there would be no net loss in HMO floorspace

1 Development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be permitted where:

1 1. it is proposed on a site which is not suitable for conventional housing;

2 2. it is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and

3 3. it would not lead to an overconcentration of single-person accommodation at the neighbourhood level.

1 Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must:

1 1. meet criteria A1-A10 of London Plan Policy H16;

2 2. demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and

3 3. provide a financial contribution towards the provision of affordable housing in the borough, in accordance with the London Plan.

1 Development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'suitable use' will generally be resisted. Such accommodation will only be permitted where:

As a general point, we would note that the tone of the policy is negative in so far that it seeks to “generally resist” such development. We therefore consider that the policy is not positively prepared or consistent with national policy i.e. being prepared with the objective of contributing to the achievement of sustainable development (Paragraph 16a of the NPPF). It is also not consistent with the London Plan which adopts a more positive approach to the provision of largescale purpose- built shared living.

We also note Paragraph 041 (Reference ID: 68-041-20190722) of the NPPG which states that communal accommodation can count towards the Housing Delivery Test and this is reinforced by Paragraph 4.1.9 of the London Plan which suggests a ratio of 1.8 non-self-contained bedrooms to 1 standard dwelling. In our view, it is implicit that there is a role for large- scale purpose-built shared accommodation to play in meeting objectively assessed housing needs and therefore it should be positively planned for and also reflect the London Plan.

In respect of the proposed criteria under Part C of Policy LP29 for which the Council will assess applications for largescale purpose-built shared living accommodation, we note these have remained largely unchanged and make the following recommendations:

1 *1. it is proposed on a site which is not suitable for conventional housing;*

According to Paragraph 17.43 of the supporting text of this policy, the reason for this criterion is to ensure that development does not compromise opportunities for more conventional forms of self-contained housing to be delivered. Whilst it is accepted that the local planning authority has a duty to plan appropriately to meet its objectively assessed housing needs over the plan period, our view is that this need should be planned positively through specific positively worded housing policies and site allocations, and not through other land use policies, particularly where a need for co-living has been identified.

Indeed, Paragraph 67 of the NPPF states that planning policies should identify specific deliverable sites in the short term and specific developable sites in the medium to long-term to meet housing needs. We note that Wandsworth as a Borough purports to be able to achieve this through the Housing and Economic Land Availability Assessment (2021) which identifies that it can demonstrate a pipeline of housing that exceeds the London Plan target of 19,500 homes over the next 10 years. As such, it is evident that the Borough can demonstrate sufficient sites to meet its housing needs without having to apply a residential land use suitability test against sites that come forward for other land uses. For this reason and as this element of the policy is not positively prepared, our Client recommends that this criterion is removed. In our Regulation 18 representations, we called for greater clarification on how the decision-maker might assess whether a site is suitable for residential development for conventional units, particularly as one would expect site suitability for large-scale purpose-built shared living or Class C3 conventional units to be precisely the same given that they are both ultimately providing homes for people. Clarification has been provided in the supporting text of paragraph 17.44 which states that

“when considering whether a proposal for large-scale purpose-built shared living would be located on a site which is suitable for conventional units the Council will have regard to:

- whether a proposal would displace existing C3 residential accommodation;*
- whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for conventional housing; and*
- whether a site has an extant planning permission for C3 housing.”*

Whilst clarification is welcome, we wholly dispute the reasoning. For example, we note bullet point 2 refers to a site being identified in Housing Trajectory or having an extant permission, however, it should be noted that a Housing Trajectory or HELAA is not a development plan document, and is essentially a list of sites that speculative landowners or developers have promoted with the intention that the Council, following an evidence based review, will potentially allocate for development. These sites do not form part of planned residential growth therefore and should not be used to limit the potential for a relatively new form of housing.

We also note that bullet point 3 refers to whether a site has an extant planning permission, however there could be many reasons why a site with an extant permission for C3 residential may not come forward and why it may instead be appropriate for other uses such as co-living. We suggest that this requirement is removed to allow more flexible delivery of accommodation that can contribute to housing need.

1 2. *it is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and*

We have reservations about this strand of the policy as Paragraph 47 of the National Planning Policy Framework states that housing policies should be based on full objectively assessed needs for market and affordable housing in the market area. The market area, however, can be different to the local area and therefore we would argue that the current wording is not consistent with national policy.

We would also note that this policy is based on an up-to-date assessment of housing need through the Wandsworth Local Housing Needs Assessment which identifies a need for such co-living accommodation. Moreover, paragraph 4.1.9 of the London Plan states that *“all other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home”*. As such, we question why such a criterion is required in any instance, since it is clear that such accommodation is an integral part of delivering housing need.

We would therefore recommend that this strand of the policy is removed or, at the very least, it is amended. The term “local” should be omitted as its meaning is not clear or defined (leading to unclear planning application assessments) and conflicts with national policy. Notwithstanding this, we support the use of “identified need” since it still fulfils the objectives of this aspect of the policy which is to ensure that applications are not speculatively driven and are meeting a need that is currently not being provided.

We also note that supporting text 17.45 states:

“It is important to ensure that large-scale purpose-built shared living accommodation can effectively contribute to the accommodation needs of its main target group, which includes young professionals and other single persons on lower quartile and median incomes. Applicants will therefore be required to demonstrate the contributions of the scheme from the perspective of the housing need of the main target group rather than from the demand point of view which is a market driven concept. It is inevitable that any form of housing will somehow contribute to meeting housing need or demand in the borough; however, given that the borough continues to face intense development pressures from different competing land uses, it is important to protect scarce land for housing which is best suited to meeting the local need. Applicants will therefore be required to demonstrate that shared-living units would be more affordable for people on lower-quartile and median incomes than conventional units (including ‘room only’ options).”

Whilst we understand the sentiment of the paragraph, we believe that this comment, to some extent, misunderstands the co-living housing tenure. Whilst it is considered a more affordable option to C3 housing tenures, a driving factor of co-living is not just affordability; it is that it provides accommodation that allows local communities to be fostered, is of high quality and amenity (allowing an attractive ‘plug and play’ offer), and offers secure tenancy. It is therefore an attractive alternative to residents that may otherwise use HMOs. This has an added benefit of reducing the demand for HMOs allowing them to be recycled into conventional housing stock. We would therefore question the accuracy of this paragraph and its purposes as supporting text within the wider Policy. Finally, we also note that the final sentence introduces a new standard/requirement that is not set out in policy, and we would like to point out that supporting paragraphs should not introduce new criteria.

1 3. *it would not lead to an overconcentration of single-person accommodation at the neighbourhood level.*

Similarly to the comments made in respect of Policy LP28 above, Policy H16 (Large-scale purpose-built shared living) of the London Plan requires such accommodation “to contribute to a mixed and inclusive neighbourhood” at the neighbourhood level. As part of this assessment, we consider that the decision-maker has the discretion to consider the matter of over-concentration

	<p>as one of a number of indicators to determine whether proposed development would contribute to a mixed and inclusive neighbourhood. As Criterion C1 of Policy LP29 requires development to meet all requirements of Policy H16, we consider that the inclusion of a specific criterion in relation to over-concentration is unnecessary and superfluous as such an assessment is already provided for, under Policy H16. Should the Council be minded to retain this aspect of the policy, our concerns raised in respect of the measure of “overconcentration” in relation to PBSA also apply here.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)</p> <p>In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.</p> <p>Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.</p> <p>The reference is not an additional affordability test, but part of the justification for applicants to give to us when considering the conventional unit argument.</p> <p>Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services. Further information regarding this criterion is provided at para 17.46.</p>
Proposed Change	No change considered necessary

Consultee Full Name	Mr Ben Wrighton
Consultee Organisation Details	Strategic Planning Director Watkin Jones Group
Agent Full Name	James Ainsworth
Agent Organisation Details	Planner Montagu Evans LLP
Comment ID	287
Title	LP30 Build to Rent
Number	Policy 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP30 – Build to Rent</p> <p>As currently drafted, Draft Policy LP30 states the following:</p> <p>LP30 – Build to Rent</p> <ol style="list-style-type: none"> 1 Development proposals for Build to Rent housing must follow the policy approach set out in London Plan policy H11, subject to the following additional requirements: <ol style="list-style-type: none"> 1 1. Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Fast Track Route, 50 per cent of the overall affordable housing requirement should be provided as low-cost products within this separate core and/or block, with the remaining 50 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If the above requirements are not met, the scheme must follow the Viability Tested route. In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole. 2 1 3. Build to Rent housing should provide a mix of dwelling sizes that meets identified local housing needs, in . Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design terms to include a separate residential core and/or block in the development proposal, the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy. To follow the Fast Track Route, the Council will seek 30 per cent of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If these requirements are not met, the scheme must follow the Viability Tested route. accordance with Policy LP24 (Housing Mix).

Discount Market Rent

In our previous Regulation 18 Representations we requested that clarification was provided so that it is clear that the on-site affordable housing could be operated under the same management as the market housing and secured on a Discount Market Rent (DMR) basis controlled by rent levels associated with London Affordable Rent and London Living Rent.

Whilst our recommendation to explicitly specify that DMR affordable housing can be under the same ownership as the private elements has not been included, we think this is implied in *“the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy”*. We request the wording is updated to provide clarity.

- 1 1. Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider

We note that as currently worded, this part of the policy favours the use of a separate BTR core and separate affordable rent core to be managed separately. We disagree, however, with this requirement as it is contrary to the NPPF and London Plan which advocates that the affordable housing as part of a BTR development can be on a DMR basis and controlled by the operator of the market development. To split the site into two elements, a BTR element and an affordable element undermines the whole BTR policy in the London Plan. We therefore strongly recommend that this element of the policy is amended to accord with National and London Plan policy.

We note that Draft Policy LP23 states that *“any relevant scheme will need to demonstrate that the design, siting and phasing of affordable homes provides for its proper integration and timely provision as part of the wider development”*. It is clear that these two draft policies are conflicting since by having separate cores, affordable homes will not be properly “integrated” into the wider development. We suggest that this part of the draft Policy LP30 is updated to ensure consistency.

- 1 3. Build to Rent housing should provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).

We consider that this criterion is acceptable on the basis that Policy LP24 makes it clear that the borough’s housing mix targets are indicative proportions and, as set out under Criterion B, as *“planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new market homes to be provided.”* We therefore trust that the Council will consider this element of the policy flexibly when assessing BTR schemes which typically have an evidenced-based need for one and two bedroom dwellings and limited demand for larger dwellings.

In support of the above, we note that the findings of the British Property Federation report “Who Lives in Build-to-Rent” (Nov 2021)¹ outlines the following:

Proportion of BTR Occupiers

- Ages 16-24 - 31%; and
- ages 25-43 - 45%.

BTR Household Type

- Couples/share - 58%;
- Single – 35%; and
- Families – 7%.

	<p>The above findings highlight just one piece of evidence that demonstrates the higher need for predominately one- and two- bedroom units and the limited demand for larger units. As explained above, we trust that the Council will apply this policy flexibly when assessing BTR schemes, or otherwise demonstrate through an evidence base which would justify otherwise</p> <p>In accordance with the above, we suggest that Part E of Policy LP24 (Housing Mix) is updated to provide clarity that the site-by-site basis for assessing dwelling mix includes consideration of the explicit evidence-based need for BTR. This should be clarified by inserting a new criterion in Part E which refers to “<i>consideration of the specific evidence-based need for BTR in accordance with Policy LP30</i>”.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy wording is clear that development proposals can follow the policy approach of London Plan Policy H11. Policy LP30 allows the Council to secure low-cost rented housing where possible, which would then be required to be managed by a registered provider.</p> <p>The supporting text sets out the Council's preference, where possible, to secure low cost rented housing through BtR schemes, allowed for by London Plan para 4.11.10. Under these circumstances, criterion A.1 would apply, and reference to an RP is relevant and necessary, alongside the reference, in design terms, to a separate block which is designed to aid management. This is a distinct requirement where low-cost rent can be secured and managed by a registered provider.</p> <p>Separation is only sought where low-cost rent can be secured and managed by an RP. This is to aid management. It is not considered to cause a direct and unjustifiable conflict with LP23.</p> <p>Policy LP30 has a direct link to Policy LP24, where criterion (e) specifically refers to contextual information which may indicate deviation from the policy requirements. Sufficient flexibility is provided in the criterion A.3 by the word, 'should'. This allows for deviations to exist where they can be justified.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	289
Title	Wandsworth Regulation 19 Local Plan
Number	

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>DRAFT WANDSWORTH LOCAL PLAN, REGULATION 19 CONSULTATION REPRESENTATIONS ON BEHALF OF MGLW</p> <p>Please find below and in the attached 'Linford Street Vision' document, representations on behalf of our clients, MGLW who are the owners and occupiers of economic space on Linford Street, in Battersea/Nine Elms.</p> <p>MGLW are the owners and operators of a granite and marble supply business serving customers throughout London and the southeast from their premises at 33, 44 and 55 Linford Street. They have operated from a series of post war industrial buildings for many years and are part of the economic character of the area.</p> <p>Like many premises in this part of Battersea and Nine Elms, the economic premises are old and poorly meet modern requirements, having been adapted over many years to meet changing circumstances. They require redevelopment in order to meet current and future business needs. In doing so however, there is significant potential to enhance the utilisation of the sites and the surrounding area.</p> <p>It is recognised that this is late in the Local Plan process. However, given that the proposals and policies of the Draft Local Plan have yet to be finally resolved, the purpose of these representations is to start a conversation with Wandsworth Council and stakeholders over the potential future options for the sites in the Linford and the northern part of Stewart's Road of which they form part. The area is covered by Proposed Policy PM3 Nine Elms, which we comment on below.</p> <p>These representations address the following policies:</p> <p>Conclusion</p> <p>These representations are intended and submitted in a positive light to help meet the future needs of the Borough in a manner that is both sustainable and maintains the fundamental objectives of the local plan review. We would wish to enter a dialogue with the Council in order to consider the ideas raised and discuss a way forward for the sites identified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	MGLW

Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	290
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PM3 Nine Elms Area Strategy</p> <p>We believe that the placemaking proposals for Nine Elms omit the area around Linford Road and Stewart's Road, which lie in an accessible location between the Patmore Estate and Covent Garden to the east and the BDTQ to the west, a short distance south of the new Battersea Power Station underground station. There is no evidential rationale for doing so and the area, which is part of the Nine Elms and Vauxhall OAPF, could and should, for part of the future development of the Borough and contribute to meeting its needs. Its location is shown in Figure 1 below.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Battersea Design and Technology Quarter area continues a long-standing strategic approach to the area. The Council is not considering the extension of this concept in the location where this site is identified. In accordance with the Policy LP34 Managing Land for Industry and Distribution and the London Plan, residential uses would certainly not be acceptable in this location.
Proposed Change	No change considered necessary.
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett

Agent Organisation Details	Director Union4Planning
Comment ID	291
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Proposed Mixed Use Allocation Land at 33, 44 and 55 Linford Street, Battersea/Nine Elms, Wandsworth SW8 4VN</p> <p>It is proposed in these representations that the sites edged red should be identified as allocations in the Local Plan for mixed use economic led redevelopment, which can include a reprovision and increase in economic space for business use in class E and/or B2/B8 with residential and related uses over. There should be no net loss of economic space and the proposals should not prejudice continued economic use on adjoining land.</p> <p>The wider area shown edged blue is proposed in these representations to be identified as an area of opportunity and change, where economic led, mixed use development would be considered and supported, provided it safeguarded the overall quantum and quality of economic space and ensured the ongoing function of the area.</p> <p>It is important to note that Linford Street and Stewart's Road lie within the Nine Elms Vauxhall Opportunity Area as defined in the London Plan and Wandsworth Local Plan. It does therefore, for part of the wider area within which the majority of economic and housing growth is to be targeted under the terms of strategic, London wide policy. There is, therefore, a basic presumption in favour of development that would support such growth.</p> <p>It is also clear from Figure 2 below, that the area outlined in blue:</p> <ol style="list-style-type: none"> 1 a) forms a discrete area bounded by the railway to the west and Stewart's Road to the east. Subject to the safeguarding of the southern boundary, it would be feasible to prepare a masterplan and development brief for the area under the terms of a proposed allocation in the Local Plan, to secure the phased redevelopment of the area to maintain and enhance its economic function and optimise its contribution to the future supply of employment space and new hom 1 b) the existing nature of economic space within the area is sub-optimal and there is significant potential for intensification and rationalisation of space to improve both quantum, flexibility and efficiency to meet modern business need <p>One illustration of how this might be achieved, to the substantial benefit of the economy of the area, is illustrated in the attached 'Linford Street Vision' prepared by CGL Architects.</p> <p>The proposed allocation would be appropriate for midrise and some taller buildings to optimise the contribution from the redevelopment of the site to housing needs and as far as this is consistent with a design led approach to the masterplanning of the area. The frontage of Stewart's Road can be enhanced through redevelopment to provide an enhanced form and consistent frontage in a mid-rise scale. To the rear (west) nearer to the railway line, there is opportunity for greater scale and some taller buildings.</p>

	<p>The character of Stewart's Road is mixed, particularly in the north. Influenced by post war reconstruction, to the west there are a variety of older buildings in economic use with some more recent residential conversions and some more recent industrial spaces. To the east lies the Patmore Estate, comprising post war apartment buildings ranging from 4 to 7 storeys in height, with the closest buildings being predominantly 6 storeys set within a landscaped environment.</p> <p>The area is within 500m or 10 minutes' walk of the new Battersea Power Station underground station and a similar distance to Battersea and Queenstown Road overground stations giving a range of good transport options. Regular bus services (P5) operate every 15 minutes on Stewart's Road and further regular services run on Wandsworth Road 5 minutes south and Battersea Park Road to the north.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Please see the response to comment #296 (Building a Strong Economy).
Proposed Change	No change considered necessary.

Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	292
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP1 Design Led Approach</p> <p>The overall aims and approach of the policy is supported and demonstrates how development can be positively managed and designed to ensure the objectives set out in these representations can be achieved.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	293

Title	LP2 General Development Principles
Number	Policy 13
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP2 General Development Principles</p> <p>The overall aims and approach of the policy is also supported, to ensure development provides for a mix of uses, including for new homes of a mixed-tenure and type, employment opportunities and which deliver strong cultural, recreational, and social services and facilities to support daily life as part of walkable neighbourhoods and do not prejudice existing and future occupiers/uses.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	294
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP4 Tall and Mid-Rise Buildings</p> <p>There is already provision within the proposed Local Plan for taller buildings within the Battersea and Nine Elms zone and Battersea Design and Technology Quarter (BDTQ). While the overall aims of Policy LP4 is supported, which seek to ensure that taller buildings are appropriate to their context and are properly designed and planned, the definition of anything over 7 storeys as being a tall building combined with the restriction to certain defined areas, restricts the potential for sites to be optimised. It potentially rules out sites where there might be a combination of mid rise and taller buildings appropriate to their context.</p> <p>Hence, we would propose that the policy should offer some flexibility that the definition of anything above 7 storeys will not rule out taller buildings where this is judged to be an appropriate design response.</p> <p>We would also, in the alternative, propose that Map 23.3 of the Battersea Tall Building Zone should be amended to show the north-western part of Stewart's Road and Linford Road as suitable for a tall building zone, subject to the proper masterplanning of the area.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>General support welcomed. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>For clarification, tall building zones do not restrict development to 7 storeys. The approach allows for height to be considered within the parameters of a maximum height range depending on the location of site within the tall building zone.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning

Comment ID	295
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP33 Promoting and Protecting Offices</p> <p>The land identified in Figure 2 should be identified as being suitable for mixed use economic led development, including a wide range of employment related uses including industry, storage and distribution, sui generis uses, workshops, offices and studios falling in use classes B8, B2, Class E (g) and sui generis use.</p> <p>Priority should be given to economic land uses but to fully optimise development of the land, residential uses in the airspace above these economic uses should be supported where this is consistent with the maintenance and enhancement of the primary economic use.</p> <p>It is clear that the northern part of Stewart's Road and Linford Street enjoy similar levels of accessibility to the proposed BDTQ and border residential uses of the Patmore Estate. The area comprises a range of different types of employment including showrooms, warehousing, the food industry and brewing and offices and workshops. The mix of uses is both appropriate and should be maintained going forward. It provides a supply of small-scale office and workshop premises formerly in class B1 and now in class e (g) which are both appropriate and for which there is significant demand. This has been informed by discussions with local commercial agents who are familiar with the area advice from which has been input to the masterplan proposals. While these proposals would be the subject of stakeholder engagement going forward, there is every reason to believe that a vibrant mix of uses supporting the aims of the SIL could and should be achieved.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Please see the response to comment #296.
Proposed Change	No change considered necessary.

Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	296
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP34 Managing Land for Industry and Distribution</p> <p>The land identified in Figure 2 should be identified as being suitable for mixed use economic led development, including a wide range of employment related uses including industry, storage and distribution, sui generis uses, workshops, offices and studios falling in use classes B8, B2, Class E (g) and sui generis use.</p> <p>Priority should be given to economic land uses but in order to fully optimise development of the land, residential uses in the airspace above these economic uses should be supported where this is consistent with the maintenance and enhancement of the primary economic use.</p> <p>It is clear that the northern part of Stewart's Road and Linford Street enjoy similar levels of accessibility to the proposed BDTQ and border residential uses of the Patmore Estate. The area comprises a range of different types of employment including showrooms, warehousing, the food industry and brewing and offices and workshops. The mix of uses is both appropriate and should be maintained going forward. it provides a supply of small-scale office and workshop premises formerly in class B1 and now in class e (g) which are both appropriate and for which there is significant demand. This has been informed by discussions with local commercial agents who are familiar with the area advice from which has been input to the masterplan proposals. While these proposals would be the subject of stakeholder engagement going forward, there is every reason to believe that a vibrant mix of uses supporting the aims of the SIL could and should be achieved.</p> <p>The approach is consistent with the principles of LP37 which seek to ensure the provision of modern, flexible economic space designed to meet the needs of a vibrant range of businesses without compromise to their ability to continue operating 24hrs and in the long term. Indeed, the redevelopment of some of the traditional employment areas is essential in meeting future needs in this manner.</p> <p>The Local Plan supports the intensification of industrial uses in both the borough's SILs and LSIAs in order to meet identified demand. It notes this could be realised through the introduction of smaller units; the development of multi-storey schemes; the addition of basements; and the more efficient use of land through higher plot ratios, although this must also ensure that sufficient yard space is retained to meet operational requirements and that any negative impacts on the transportation network are appropriately mitigated. The Plan supports the most efficient use of sites through a masterplan. This can achieve efficiencies in particular in relation to access and servicing arrangements</p>

	While Policy LP34 restricts development in SIL and LSIA's to industrial uses because of the adverse impact other development might have on the capacity and capability of those sites to meet these needs, this is not always likely to be the case. It is clear from the initial stages of the masterplanning process undertaken thus far for Linford Street, that it is possible to enhance the quantum and quality of industrial space within the area and provide for complimentary mixed-use development. This is shown in the option set out in the accompanying CGL Vision document. Given the containment of the area by roads and railway lines, this would have no adverse impact on the function of the SIL outside of the area identified.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The area identified falls within the Queenstown Road, Battersea SIL. In accordance with the findings of the borough's Employment Land and Premises Study, the Council considers that the designated industrial land, including this site, remains the best location to meet the identified need for industrial land over the Local Plan period. It is noted that the Council is able to meet identified needs for other (non-industrial) uses in locations that are considered preferable (such as town centres and other identified locations for offices, and through site allocations and small sites for housing). As set out in paragraph 18.30, conflict can arise when non-industrial uses are co-located with industrial activities. This is particularly the case for storage and distribution uses, which form the majority of the anticipated demand. Retaining land that is suitable to meet future industrial needs is a requirement of the NPPF, and indeed the intensification of this site for industrial uses is supported. As such, it is not considered appropriate to change the approach to the Queenstown Road, Battersea SIL in this location. It is noted that an exceptional approach, founded on a long-term strategic vision, is taken for the BDTQ. The Council is not considering the extension of this concept in the location where this site is identified, and it is therefore not appropriate for it to be allocated.
Proposed Change	No change considered necessary
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	297
Title	LP35 Mixed-Use Development on Economic Land
Number	Policy 46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	LP35 Mixed Use Development on Employment Land

	<p>For the reasons stated in respect of LP34 and the proposed Site-Specific Allocation set out earlier in this submission, we consider that the area outlined in blue on Figure 2 be identified as being suitable for mixed use development under policy LP35 as either a Economic Use Protection Areas (EUPA) or Economic Use Intensification Areas (EUIA). Given that the principle of these submissions is the reprovision and increase in the quantum and quality of economic space as a requirement, they are entirely consistent with the principle of EUIAs which are to promote investment in modern industrial premises provide business floorspace for SMEs to support the borough's economy and deliver residential uses to meet the borough's housing needs. The designation requires that proposals provide intensified industrial uses and increased business floorspace and/or open workspace for SME businesses. Residential uses will only be appropriate where they assist in developing more intensive economic uses and are compatible with those uses and the spatial objectives set out in the relevant Area Strategy and/or Site Allocation.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Please see the response to comment #296.
Proposed Change	No change considered necessary.
Consultee Full Name	MGLW
Consultee Organisation Details	
Agent Full Name	Steven Fidgett
Agent Organisation Details	Director Union4Planning
Comment ID	298
Title	LP37 Requirements for New Economic Development
Number	Policy 48
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP37 Requirements for New Economic Development</p> <p>While we support the overall aim of Policy LP37, we consider that this principle can be applied successfully under the preceding policies to ensure that in mixed-use developments, including those that incorporate some residential use, the design and layout of the development can ensure that the proposed uses can successfully co-exist, having had regard to the amenity of future residents and the operational requirements of existing and future businesses.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. LP37 takes forward a successful existing policy (with appropriate modifications) which has worked well in practice. Given the importance of ensuring that different uses in mixed-use development can operate together effectively, the Council considers that retaining a distinct policy requirement for this is important.
Proposed Change	No change considered necessary
Consultee Full Name	Hitchcock and King
Consultee Organisation Details	
Agent Full Name	John Cutler
Agent Organisation Details	Associate Planning Director BNP Paribas Real Estate
Comment ID	299
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>1 Executive Summary</p> <p>This report is provided in response to the Wandsworth Local Plan Review (Regulation 19) Consultation in respect of 680 Garratt Lane, London, SW17 0NP owned by our client, Hitchcock and King. A red line plan (Appendix A) supports this submission.</p> <p>Our client is concerned about the approach to the proposed re-designation of Summerstown Locally Significant Industrial Area (LSIA), and specifically 680 Garratt Lane, as a Strategic Industrial Location (SIL). Our client's land is located within the existing Summerstown LSIA, on the eastern side of the Area, adjoining Garratt Lane. Our client is concerned that the Council's proposal to re-designate the entire Summerstown LSIA does not consider the surrounding context.</p> <p>The identification of Summerstown as a SIL is based on the London Plan (2021) Policy E5. The policy states that that through individual Development Plans, the Boroughs should define the boundaries of the proposed SILs. Thus, SILs identified in the London Plan are illustrative only.</p>

Summerstown LSIA covers some 10.1 hectares, and covers distinctive areas, with variations in surrounding context. In the context of London Plan Policy E5 above, it is held that the Council's evidence base is high- level and does not consider the appropriateness of the different parts of the Summerstown LSIA, or indeed individual land parcels in respect of the SIL designation.

680 Garratt Lane represents a modest triangular parcel of land which is surrounded by established residential properties to the south and east. It is in a sustainable location, with good access to public transport and local amenities. Given the close proximity to established residential properties, it is held that the SIL designation (which would allow intensive industrial uses potentially on a 24 hour basis, including waste activities) is not appropriate to all parts of the existing Summerstown LSIA, notably at 680 Garratt Lane.

For the reasons set out in this report it is considered that the draft Local Plan does not comply with NPPF Paragraph 35; specifically that the proposed designation of 680 Garratt Lane as SIL is not justified, and is not consistent with national or regional policy.

In our view, 680 Garratt Lane should instead be allocated as residential, or mixed-use (commercial and residential) development site to ensure a smooth transition between the industrial and residential areas.

To avoid any ambiguity, it is proposed that:

- The Council review the proposed change at paragraph 2.2.1 on page 8 of the 'Policy Map Changes' document.
- 680 Garratt Lane be removed from the proposed re-designation of Summerstown LSIA as a SIL.
- A separate residential or mixed-use (commercial and residential) allocation be created for land owned by our client, based on the red line area provided at Appendix A.

1 Conclusions

In our view, with reference to NPPF Paragraph 35, the Council's approach to re-designate Summerstown LSIA as a SIL is not:

Positively prepared – the re-designation as currently drafted clearly does not make the optimal use of the development sites (NPPF paragraph 124). It also does not support development that makes efficient use of land, taking into account of the promotion of regeneration and change (NPPF paragraph 124). Chapter 11 of the NPPF encourages the promotion of effective use of land in meeting the need for homes and other uses. A positively prepared approach would endeavour to boost multiple benefits from the land at Summerstown (as per paragraph 120 of the NPPF). However, the Council's approach does not. Moreover, the approach does not accord with Policy GG2 of the London Plan which encourages planning and development to create sustainable spaces that make the best use of land.

Justified – the proposed allocation of 680 Garratt Lane as SIL does not comprise the most appropriate strategy for the site (noting the potential alternative for a residential / commercial and residential mixed use allocation), as highlighted at London Plan Policy E7(C). The approach taken in the Local Plan review appears not to recognise that the London Plan Policy E5(B) requires that Boroughs should define the SIL boundaries in their areas. Moreover, the evidence base is flawed as it does not recognise the potential conflict between the proposed SIL (enabling 24 hour industrial uses) and the immediately adjacent residential properties).

Consistent with national policy – for the reasons set out in this report, it is held that the proposed re-designation of 680 Garratt Lane as part of the Summerstown SIL conflicts with London Plan Policies GG2, E5 and E7 and Paragraphs 119, 120 or 124 of the NPPF.

Our suggested approach to address these issues are set out at Section 1 of this report.

1 Closings

We trust that the above provides informative comments to the current consultation.

We would be grateful if you could please confirm safe receipt of these representations and for the above comments to be considered before the revised Local Plan Review is finalised and submitted.

In addition, we request to be kept informed on the Examination proceedings and request to reserve the ability to take part in any Examination Hearings on behalf of our client.

Please do not hesitate to contact us should you wish to discuss any of the above further. We would be pleased to meet to discuss the merits of the proposal in detail.

Change(s) considered necessary

The Council review the proposed change at paragraph 2.2.1 on page 8 of the 'Policy Map Changes' document.

Wishes to attend Hearing Session

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

Reason why

Council Response

The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers. The study recommended that employment land within the designated SILs and LSIA remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP34 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA. Policy LP 13 (Circular Economy, Recycling and Waste Management), Part F specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA. It is important to recognise that the policy intention is to protect land in order to meet future need, and sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term, nor would every site necessarily be appropriate for all the identified uses (i.e. while there is support in principle, consideration would need to be made on a case by case basis through the development management process).

The approach in the Local Plan is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence". As identified within the representation, the site at 680 Garratt Lane currently comprises an open storage use (B8), and therefore contributes to meeting the borough's identified need for storage. The redevelopment of the site to incorporate other uses would result, the representation states, potentially allow for a commercial unit of circa 508 sqm. This is noted as around 40% of the site area, which would therefore represent a reduction on the current capacity of the site for industrial uses, or for redevelopment proposals wholly in this use, and is therefore contrary to the ambitions of paragraph 82. The representation posits the potential benefits that would be delivered through the provision of additional housing, and the Council is cognisant of the need to deliver these; however the Local Plan sets out an approach to achieve this without requiring existing industrial capacity to be released. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings.

The designation of Summerstown LSIA as a SIL is considered justified on the basis of the Employment Land and Premises Study, which is based on detailed analysis and which was produced with significant input from officers at the GLA. The consultants undertaking this study were specifically tasked with such analysis on the basis of requirements set out within the London Plan Policy E5.B.1 to assist the Council to determine appropriate boundaries, noting the identification of this broader area in the London Plan (Table 6.2). The site at 680 Garratt

	Lane forms part of the wider industrial area, and it is not considered appropriate to release this land based on the borough's identified need, nor to distinguish this particular this site with a different status to the rest of the SIL. The Council agree with the study's finding that Summerstown, as a whole, forms a strategically important location for industrial uses, of which this site forms a part. It is noted that both the GLA / Mayor of London and the London Borough of Merton have supported the site's designation as a SIL.
Proposed Change	No change considered necessary.

Consultee Full Name	Hitchcock and King
Consultee Organisation Details	
Agent Full Name	John Cutler
Agent Organisation Details	Associate Planning Director BNP Paribas Real Estate
Comment ID	300
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>1 Site Background</p> <p>The Council will be aware of the site characteristics, constraints and opportunities, however a summary is also provided here for reference.</p> <p>The land owned by our client as shown at Appendix A is approximately 0.127 hectares and comprises open storage (B8 use), which is accessed via Garratt Lane.</p> <p>To the east fronting Garratt lane are 3, two-storey terraced houses. To the south-east are two-storey terraced houses in Keble Street with gardens backing on to the Site – a number appear to have accommodation at second floor level.</p> <p>To the north-west is a petrol station, and to the rear (west) of that planning permission has been granted for a 13.8m tall (around five residential storeys) self-storage (B8) building, which would have a blank façade facing the site (LPA ref: 2021/0005) – there is an existing 9.3m tall wall on the boundary.</p> <p>To the rear (west) are a number of single storey commercial units fronting onto Summerstown, beyond which is residential development up to eight and ten storey (part of AFC Wimbledon Plough Lane development).</p> <p>On the opposite (eastern) side of Garratt Lane are two-storey terraced houses.</p> <p>1 Indicative Proposals for 680 Garratt Lane</p> <p><i>Deliverability</i></p>

For the reasons set out in this letter (notably the close proximity to residential properties), it is considered that the Site is not suitable as a SIL (due to the incompatibility of SIL and the established adjoining residential use).

Presently the site comprises open storage behind secure gates – it is considered to detract from the quality of the local public realm. It also presently provides little employment or economic benefit, and represents an inefficient use of land in a sustainable mixed use location. The site access also means that it is likely to be unsuitable for significant levels of large vehicle movements typically associated with industrial land uses.

Noting that the site to the north has consent and is being developed already, there is no opportunity for a co-ordinated approach to development. Therefore, the owner of the site is keen to bring the site forward independently.

Design and Density

Design work has not yet been undertaken by architects. However, a design team will be instructed in the near future to undertake initial sketches. Given the surrounding land uses, it is considered that a residential or mixed use scheme would be appropriate in this location. A mixed use scheme would likely provide residential compatible commercial use at ground floor level with residential at the upper floor levels. Noting the surrounding context it is considered that a four storey development could be appropriate (subject to detailed design considerations). It is considered that the site access could be appropriate for a car-free / low car ownership scheme.

Residential Scheme

As a broad indication of residential development potential, the London Strategic Housing Land Availability Assessment 2017 (part of the London Plan 2021 evidence base) highlights indicative housing capacity estimates at Table 2.8. Based on the site PTAL of 2 – 3, and the Urban setting of the site, a density of around 145 dwellings per hectare would be assumed, which would equate to 18 dwellings on this site.

Mixed Use Scheme

It is held that at ground floor, a commercial unit of circa 508 sqm GIA could be provided (40% of the overall site area of around 1,270 sqm). It is envisaged that this would be within E(g)(i) / B2 / B8 use classes.

Noting the provision of commercial floorspace at ground floor level (of a four storey scheme), it could be assumed that the indicative residential capacity could be reduced by around a quarter. Therefore, it is considered that 14 dwellings would be an appropriate indicative residential capacity for this site (as part of a mixed use scheme).

1 National and Regional Planning Policy Context

The Council will be aware of the national and regional planning policy context. However, it is important to highlight specific elements.

It is clear that national and London-wide policy supports the efficient use of land in sustainable locations such as the Site at 680 Garratt Lane.

National Planning Policy Framework

As set out within the National Planning Policy Framework (NPPF), the purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7) which has three overarching objectives, which are economic, social and environmental (Paragraph 8). In respect of the economic objective, this identifies the need to *'help build a strong, responsive and competitive economy, by **ensuring that sufficient land of the right types is available in the right places** and at the right time to support growth, innovation and improved productivity* (our emphasis). The social objective also highlights the need to sufficient number and range of homes can be provided with accessible services, and the environmental objective highlights the need to make effective use of land.

The NPPF sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.

The principal test guiding policy adoption is that of 'soundness', namely that the plan should be (NPPF paragraph 35):

*'Positively prepared – the plan should be prepared based on a strategy which seeks to **meet objectively assessed development** and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*

*Justified – the plan should be the **most appropriate strategy**, when considered against the reasonable alternatives, **based on proportionate evidence**;*

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

*Consistent with national policy – the plan should enable the delivery of sustainable development in **accordance with the policies in the Framework**.*' [our emphasis]

Paragraph 119 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses.

Paragraph 120 sets out various was planning policies and decision should promote effective use of land. Parts a, c, d and e are as follows:

Planning policies and decisions should:

- 1 a) "***Encourage multiple benefits from both urban and rural land, including through mixed use schemes*** and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- 2 c) ***Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs***, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable and;
- 3 d) ***Promote and support the development of under-utilised land*** and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or ***above service yards***, car parks, lock-ups and railway infrastructure); and
- 4 e) Support communities to use the ***airspace above*** existing residential and ***commercial premises for new homes***. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighboring properties and the over street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupier" [our emphasis]

Paragraph 124 highlights the requirement for planning policies and decisions to support development that makes efficient use of land, taking into account:

- 1 a) "The identified need for different types of housing and other forms of development, and the availability of land ***suitable for accommodating it***;
- 1 b) Local market conditions and viability;
- 2 c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

*The desirability of maintaining an area's prevailing character and setting (including residential gardens), or ***promoting regeneration and change***; and*

- 1 e) The importance of securing ***well-designed, attractive and healthy spaces***." [our emphasis]

London Plan

The new London Plan was adopted in March 2021.

Policy GG2 promotes making the best use of land. To develop prosperous and sustainable mixed-use spaces that make the best use of land, Policy GG2 says those in planning and development must (inter alia):

*“enable the **development of brownfield land**, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as **utilising small sites***

prioritise sites which are well-connected by existing or planned public transport

*Proactively explore the potential to **intensify the use of land to support additional homes and workspace, promoting higher density development**, particularly in locations that are well- connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.*

*applying a design-led approach to determine the **optimum development capacity** of sites*

*understand what is valued about existing places and use this as a catalyst for **growth, renewal, and place-making**, strengthening London’s distinct and varied character.”*[our emphasis]

Policy E5 (Strategic Industrial Locations – SIL) states that Strategic Industrial Locations are required to support the functioning of London’s economy. Part B of Policy E5 states (inter alia):

“Boroughs, in their Development Plans, should,

1) Define the detailed boundary of SILs in policies maps having regard to the scope for **intensification, co-location and substitution (set out in Policy E7 Industrial Intensification, Co- location and Substitution).”**[our emphasis]

Part D of Policy E5 states:

“Development proposals within or adjacent to SILS should not compromise the integrity or effectiveness of these locations in accommodating industrial –type activities and **their ability to operate on a 24-hour basis. Residential development adjacent to SILSs should be designed to ensure that existing or potential **industrial activities in SIL are not compromised or curtailed**. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.”**[our emphasis]

Supporting paragraph 6.5.1 states of SIL land:

*‘They can accommodate activities which - by virtue of their **scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements** - can **raise tensions** with other land uses, particularly **residential** development.’*[our emphasis].

Policy E7 (Industrial Intensification, Co-location and Substitution) states (inter alia):

“B. Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as

part of a co-ordinated master planning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or master planning process.

Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:

- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
- 2) **it has been allocated in an adopted local Development Plan Document for residential or mixed-use development;** or
- 3) **industrial, storage or distribution floorspace is provided as part of mixed-use intensification** (see also Part C of Policy E2 Providing suitable business space)

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part D below.

D The processes set out in Parts B and C above must ensure that:

- 1) **the industrial and related activities** on-site and in surrounding parts **of the SIL**, LSIS or Non- Designated Industrial Site **are not compromised in terms of their continued efficient function**, access, service arrangements **and days/hours of operation noting that many businesses have**

7-day/24- hour access and operational requirements

- 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
- 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 above with particular consideration given to:
 - 1 a) safety and security
 - 2 b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
 - 3 c) design quality, public realm, visual impact and amenity for residents d) agent of change principles
 - 4 e) vibration and noise
 - 5 f) air quality, including dust, odour and emissions and potential contamination.”[Our emphasis].

Conclusions

To conclude, it is clear that national and regional planning policies promote the efficient use of land for residential development, and in some circumstances this could mean co-location of residential and commercial uses to provide a sustainable mixed-use development.

In terms of the SILs, London Plan Policy E5 confirms that the identification of the various SIL locations within the London Plan at Figure 6.1 are illustrative only, and that the individual Boroughs should in their development plans, define the detailed boundaries of SILs in policy maps, having regard to Policy E7. Policy E7(C) specifically sets out support for residential, and mixed use (industrial and residential) allocations where appropriate. Policy E7(D) sets out the importance that any such development is carefully designed, noting the land uses.

Change(s) considered necessary	A separate residential/mixed-use allocation should be created for land owned by our client, based on the red line provided at Appendix (attached to our response).
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted.
Proposed Change	No changes considered necessary.
Consultee Full Name	Hitchcock and King

Consultee Organisation Details	
Agent Full Name	John Cutler
Agent Organisation Details	Associate Planning Director BNP Paribas Real Estate
Comment ID	301
Title	Paragraph
Number	18.26
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>1 Council Approach to Re-Designate Summerstown as a SIL</p> <p>As highlighted above, London Plan Policy E5 provides guidance on how Boroughs should define the detailed boundaries of SILs, and develop local policies to protect and intensify SILs. The Policy also states that residential development adjoining SILs should be carefully designed so as to ensure that the 24-hour operation of SIL is not affected.</p> <p>The London Plan does not define the boundaries of SILs, it merely provides a broad location. The Wandsworth Local Plan is the mechanism for defining the defined boundary.</p> <p>The Regulation 19 Local Plan sets out the proposed re-designation of the Summerstown LSIA to a SIL, following the same defined boundaries as the existing LSIA (see Figures 1 and 2).</p> <p>1 Removal of 680 Garratt Lane from SIL Designation and Proposed Allocation</p> <p>680 Garratt Lane forms part of the eastern boundary of the Summerstown LSIA, and is located adjacent to Garratt Lane. To east and south east of the site are rows of terraced houses. On the opposite side of Garratt Lane (northern side of the A217) is also residential.</p> <p>London Plan Policy E7 sets out potential for the co-location of industrial and residential uses, but highlights that this should be provided with appropriate design mitigation. Part C of the policy highlights the potential for residential, or mixed use (industrial and residential) allocations.</p> <p>Such an approach would deliver a number of benefits:</p>

	<p>Provision of residential / mixed-use development on under-utilised commercial land, which is supported in national and regional planning policy.</p> <p>A transition in land use between the residential areas to the south east/east and the commercial areas to the north and west.</p> <p>Protection of residential amenity of neighbouring properties to the east and south through a well- considered scheme.</p> <p>Potential to provide other environmental benefits, such as landscaping, and enhancing flood risk management.</p> <p>Significant public realm enhancements to Garratt Lane.</p> <p>An efficient use of land in a sustainable location, which is supported in national and regional planning policy.</p>
Change(s) considered necessary	680 Garratt Lane be removed from the proposed re-designation of Summerstown LSIA as a SIL.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Please see response to comment #299 under Chapter 1.
Proposed Change	No changes considered necessary.
Consultee Full Name	Hitchcock and King
Consultee Organisation Details	
Agent Full Name	John Cutler
Agent Organisation Details	Associate Planning Director BNP Paribas Real Estate
Comment ID	302
Title	Paragraph
Number	3.19
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Wandsworth Employment Land and Premises Study 2020

The Wandsworth Local Plan review evidence base includes the Wandsworth Employment Land and Premises Study 2020 prepared by Aecom. The Study recommends the Council should consider re-designating the Summerstown LSIA as Strategic Industrial Land. The study states London Plan Policy E5

'identifies the North Wimbledon/Garratt Business Park (Summerstown) as a Strategic Industrial Location.'

Aecom then recommend (R6) that the Council take forward the proposition in the London Plan and re-designate the site.

The analysis of the Summerstown LSIA appears to be limited. Paragraph 4.58 (where it is named 'Cluster C2') discusses the LSIS characteristics in very broad terms and 8.16 states that 'though close to both new

and established residential areas, occupiers have little to no impact on neighbouring sensitive uses where these are present.'

Table 4.10 provides an analysis of 'Performance of employment clusters against criteria used to assess prospects for intensification'. This fails to note that parts of the LSIA (for instance 680 Garratt Lane) are located in close proximity to residential properties, despite the fact that such proximity is highlighted in respect of other 'clusters'. For instance, clusters C7, C9, C10 and C11 (not exhaustive) are considered unsuitable for 'industrial intensification' at least partly due to the relationship with surrounding residential properties.

Paragraph 8.41 indicates that the Summerstown LSIA is an active and well-functioning industrial estate, but notes that:

*'The area is a hub for activities which **may lead to tensions with other land uses** due to **their scale, noise and odours**....'* [our emphasis]

Paragraph 8.42 goes on to state:

*'The draft New London Plan has proposed that the Summerstown LSIA become a Strategic Industrial Location. This study recommends that the Council take forward this proposition and re-designate the site. Although there is little threat of redevelopment of the site for non-industrial uses such as residential, the site currently performs functions characteristic of SIL. Designating it as SIL will formalise and further protect the industrial uses within it. **The site does not appear to have any 'bad neighbour' issues and there is possibility for 24-hour working** particularly in the Wimbledon Stadium Business Centre. **Re-designating the site as a SIL will further promote intensified industrial use such as 24-hour working** and positively benefit businesses located there.'* [our emphasis].

There is no statutory definition of 'bad neighbour' uses in England, however it is considered that this refers to neighbouring uses which negatively effect each other. For residential property, this would include uses giving rise to fumes, noise, vibration, smoke, and artificial lighting, particularly where these arise during unsociable hours.

In this context it is difficult to understand how the Employment Land and Premises Study fails to identify any potential 'bad neighbour' issues and indeed highlight the potential for 24-hour industrial uses (including potential waste uses), within the entirety of the existing Summerstown LSIA, when there are residential properties immediately adjoining the Site at 680 Garratt Lane. This has the potential to cause significant nuisance to occupiers on Garratt Lane and Keble Street.

The evidence base appears not to acknowledge that the Summerstown SIL in Policy E5 is a broad location only, or provide any more detailed analysis of the various parts of the LSIA. A more detailed assessment is required to define the exact SIL boundary, as required by London Plan Policy E5(B).

Conclusion

In our view, the approach taken currently is not positively prepared or justified, as the boundary of the proposed Summerstown SIL is identical to the LSIA's, without detailed justification for this. LSIA's and SIL's promote different types of industrial uses with varying impacts on the surrounding context. An area that performs well as a LSIA is not necessarily going to perform well as an SIL. There is a lack of justification from the Council's evidence base as to why the entire Summerstown LSIA's should be re-designated as a SIL. The approach taken in the evidence base to the 680 Garratt Lane site therefore appears to be flawed.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. Please see response to comment #299 under Chapter 1.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	305
Title	LP12 Water and Flooding
Number	Policy 23
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Policy LP12 Water and Flooding</u></p> <p>The comments below are in relation to policy LP 12 Water and Flooding. Please note our comments are related to fluvial and tidal flood risk only.</p> <p><u>Part A</u></p> <p>Part A states that '<i>All planning applications will need to clearly demonstrate that the proposals avoid, minimise, or reduce contributing to all sources of flooding...</i>'.</p> <p>The term '<i>minimise</i>' is weak wording and suggests that some increase in flood risk is acceptable. This is contrary to NPPF which states that '<i>development should be made safe for its lifetime without increasing flood risk elsewhere</i>'. We strongly recommend removing the word '<i>minimise</i>' from this policy wording. We welcome that since the Regulation 18 consultation, the policy has been updated to include that developments should '<i>reduce</i>' flood risk. This could help encourage proposals to provide betterment in terms of flood risk from the existing situation. For example, by raising finished floor levels that are currently below the flood level or by providing additional flood storage rather than just ensuring it is not reduced. We note that finished floor level requirements and compensation requirements are detailed in later parts of the policy. It may be prudent to reconsider what this part of the policy is trying to achieve.</p>

Recommended action: remove the term '*minimise*' from Part A of Policy LP 12. We recommend you consider what this part of the policy is trying to achieve and re-wording the policy appropriately.

Part B

Part B states that '*The Sequential Test is considered to have been passed, and a Flood Risk Assessment will not be required, if the proposal is not a major development or at least one of the following applies...*'.

Paragraph 167 of the NPPF states that '*Where appropriate, applications should be supported by a site-specific flood-risk assessment*'. Footnote 55 states that '*A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use*'. Therefore, even if a site is considered to have passed the Sequential Test, a Flood Risk Assessment (FRA) is still required. It is needed to demonstrate the development is '*safe for its lifetime without increasing flood risk elsewhere*' in line with Paragraph 159 of the NPPF, and to demonstrate that it complies with the criteria set out in Paragraph 167 of the NPPF. The FRA should also demonstrate whether the site has passed the Sequential and/or the Exception Test, where applicable. An FRA is still required even if a site is not subject to the Sequential or Exception Test, as set out in Paragraph 168 of the NPPF.

If this wording was kept in the Local Plan we would find it unsound as it does not comply with National Planning Policy.

Recommended action: remove '*... and a Flood Risk Assessment will not be required...*' from Part B of Policy LP 12.

Part B4 states that the Sequential Test will be considered to be passed if development is '*minor development, conversions and change of use*'.

We strongly recommend you clarify which definition of '*minor development*' you are referring to here to avoid confusion for applicants. Given the context of part B4, we believe you are referring to minor development in relation to flood risk. This is defined in Section 1b 'Interpretation of Table' of Schedule 4 'Consultations before the grant of permission' of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (The Town and Country Planning (Development Management Procedure) (England) Order 2015 (legislation.gov.uk)) and in Paragraph: 046 Reference ID: 7-046-20140306 of the Planning Practice Guidance (Flood risk and coastal change - GOV.UK (www.gov.uk)). We strongly recommend you add this definition, or a link to it, to the policy, perhaps as a footnote.

If you are referring to '*minor development*' in terms of development providing nine units or less, then we would not support this policy. This is because the policy would then exclude almost all development, except windfall major development, from undergoing the Sequential Test. This would severely limit the application and benefits of the Sequential Test which ensures development is located in areas of lowest flood risk and is an important step in delivering sustainable development.

Recommended action: update the wording of part B4 of Policy LP12 to say '*minor development in relation to flood risk, conversions and change of use*'. Include the definition, or a link to the definition, of minor development in relation to flood risk within Part B4 of Policy LP12. This could be added as a footnote.

Part B5 states that '*For development sites falling outside of these areas, the default area of search for the Sequential Test to be applied will be the borough administrative area, unless justification is provided for a smaller area as described in the Strategic Flood Risk Assessment*'.

This appears to be guidance on how to apply the Sequential Test rather than the fifth criteria for determining whether the Sequential Test is considered to be passed or not. Therefore, we recommend that the formatting is updated to reflect this. We recommend removing the '5.' bullet point and setting the paragraph back to be in line with the opening paragraph of part B.

Recommended action: update the formatting for part B5 of Policy LP 12 as suggested above.

The Sequential Test is an important tool to determine which sites are appropriate to be developed in relation to flood risk. Once a site has been chosen, after passing the Sequential Test where appropriate, it is also important to consider a sequential approach to the layout of the site itself. This is supported by Paragraph 167a of the NPPF which states that '*within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location*'. For example, this ensures that if a site is partially within Flood Zone 3 and partially within Flood Zone 2 then residential development should be located in the lower flood risk area and any playing fields/public open space should be located in the higher flood risk area. We recommend that you encourage a sequential approach to the layout of sites within this policy.

Recommended action: We recommend that you add, perhaps into or after Part B of Policy LP 12, wording that encourages a sequential approach to be considered in the layout of the site.

Part C

Part C discusses the application of the Sequential Test; the Exception Test; safe access/egress and Flood Emergency Plans; providing additional flood storage and/or attenuation; and floodplain storage compensation.

All this different information is discussed in one long paragraph. We strongly recommend separating these different requirements into different paragraphs.

Recommended action: We recommend that you separate out the different issues covered by Part C of Policy LP 12 into separate paragraphs.

Please see our next comments for our recommendations in relation to updating the location/formatting and the specific wording/content of Part C of Policy LP 12.

Part C (Sequential and Exceptions Test) - Part C states '*Development will be guided to areas of lower risk, both on-site and by applying the 'Sequential Test' as set out in national policy guidance, and where required, the 'Exception Test'. Inappropriate developments and land uses will be refused in accordance with national policy and guidance, and the Council's Strategic Flood Risk Assessment (SFRA)*'.

Part B of Policy LP 12 has already set out when the council considers developments must undergo the Sequential Test. Therefore, it is confusing to also mention the application of the Sequential Test in Part C. Furthermore, it is potentially contradictory as it states the Sequential Test should be applied as '*set out in national policy guidance*' but you already consider some sites to have passed the test subject to criteria in Part B.

Recommended action: remove repetition about applying the Sequential Test.

We welcome that this section of Part C clarifies that the Exceptions Test should be carried out in accordance with national policy guidance. We also welcome that it confirms that inappropriate development and land uses will be refused in accordance with the listed guidance. This wording should be kept.

In terms of the location/formatting of this text, we recommend it is kept after the current Part B as a separate lettered bullet point. The Exception Test related wording could become the new 'C.' bullet point. The bold heading could be updated from '*The application of the Sequential Test*' to '*The application of the Sequential and Exception Tests*' to incorporate lettered bullet point B and the new Exception Test bullet point C.

Recommended action: create a separate lettered bullet point (potentially the new bullet point C) which discusses the Exception Test requirements.

Part C (Safe access/egress and Flood Emergency Plans) – Part C states '*In flood zones 2 and*

3, all planning applications (or other relevant applications) on sites of 10 or more dwellings or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted'.

The Environment Agency is not responsible for commenting on safe access/egress, safe refuge or Emergency Planning. We strongly recommend you discuss these requirements and associated formatting with your Emergency Planning Team.

Although we cannot comment on the content/requirements for Emergency Planning, we do have a recommendation in terms of the formatting of this section. We recommend that the Emergency Planning aspects of the current Part C of Policy LP 12 are separated out into its own separate lettered bullet point. This could be moved to after '*Table 15.1 Flood Zones – Development Restrictions*' or after '*Table 15.2 Requirements for Basements in Flood Zones*'. It could also have its own bold heading, such as '*Emergency Planning*'.

Recommended action: create a separate lettered bullet which discusses the safe access/egress, safe refuge and Emergency Plan requirements (currently set out in Part C of Policy LP 12). Consider, with your Emergency Planning Team, where this new bullet point should be located within the policy and whether the wording and requirements reflect what will be required in practice.

Part C (Flood storage compensation & surface water attenuation) – Part C states '*Where a Flood Risk Assessment is required, on-site attenuation solutions to alleviate fluvial and/or surface water flooding over and above floodplain compensation is required. The consideration of potential increases in flood risk off-site where development would result in a loss of floodplain storage is also required with suitable mitigation proposed in accordance with the advice of the Environment Agency and Lead Local Flood Authority*'.

This part of the policy is discussing two things for two different sources of flood risk: for surface water flooding and for fluvial flooding it is requesting that additional flood storage/attenuation is provided; and for fluvial/tidal flooding (and potentially surface water flooding) it is requesting that there is no loss of existing flood storage. We support the intent behind this wording for fluvial/tidal flooding but have the following

recommendations in relation to the location/formatting and the specific wording/content of this part of Part C of Policy LP 12.

We would like to remind you that the Environment Agency is not responsible for managing surface water flooding and recommend that you discuss the contents in relation to this with the Lead Local Flood Authority (LLFA) officers.

No loss of flood storage requirements – Firstly, we have the following recommendations in relation to part C's intent to ensure no fluvial/tidal flood storage is lost because of development. Part C states '*The consideration of potential increases in flood risk off-site where development would result in a loss of floodplain storage is also required with suitable mitigation proposed in accordance with the advice of the Environment Agency and Lead Local Flood Authority*'.

Development must ensure appropriate flood storage compensation is provided for the fluvial and undefended tidal floodplain. The undefended tidal floodplain is riverward of the flood defences.

For the fluvial floodplain, any loss of flood storage within the fluvial 1 in 100 inclusive of climate change flood extent (for example through an increase in built footprint or change of ground levels) must be compensated for on a level-for-level and volume-for-volume basis. For the undefended tidal floodplain, to ensure there is no loss of flood storage there should be no increase in built footprint or raising of ground levels as level-for-level and volume-for-volume flood storage compensation is not achievable in this location. If water compatible structures, such as pontoons or slipways, are proposed, they should be designed to minimise the loss of flood storage i.e. by being floodable, hollow structures rather than solid structures.

Recommended action: please see below (in blue) our proposed wording and formatting regarding fluvial/tidal flood storage in Policy LP 12.

Additional flood storage - Next, we have the following recommendations in relation to Part C's intent to provide additional flood storage. Part C states '*Where a Flood Risk Assessment is required, on-site attenuation solutions to alleviate fluvial and/or surface water flooding over and above floodplain compensation is required*'.

The word '*attenuation*' is usually used to describe managing surface water flooding. For example, for surface water flood risk alleviation, onsite attenuation is used to manage surface water and to mitigate increased runoff rates and volumes. This same mechanism, however, will not compensate for, or create additional storage for, fluvial or tidal flooding. For fluvial flooding, additional storage would have to be provided on a level for level and volume for volume basis or by reducing the built footprint. In undefended tidal areas, additional storage would have to be provided by reducing the built footprint, or in more extreme cases, by setting back the flood defence landward. As '*on-site attenuation solutions*' are not a form of providing additional flood storage for fluvial or undefended tidal

flooding, we recommend this wording is updated to incorporate these other forms of flooding.

Recommended action: please see below (in blue) our proposed wording and formatting regarding fluvial/tidal flood storage in Policy LP 12. We recommend this wording, or similar, is added to Policy LP 12 after the two tables or after the Sustainable Drainage (E, F & G) section, prior to the Flood Defences (H) section. Please note this wording is draft and would need additional clarifications regarding the additional storage provision (see additional comments below).

“Fluvial and undefended tidal flood storage

-
- 1 Applicants will be required to demonstrate that their proposal does not increase, and reduces, fluvial and/or tidal flood risk elsewhere by ensuring that:
-
- 1 Any loss of fluvial flood storage within the 1 in 100 plus appropriate climate change allowance flood extent must be compensated for on a level for level, volume for volume basis. Proposals must demonstrate that fluvial flood flow routes are not impeded.
-
- 1 In undefended tidal areas there is no increase in built footprint or raising of ground levels. Where water compatible structures are acceptable, such as pontoons or slipways, they must be designed to minimise the loss of flood storage i.e. floodable, hollow structures.
-
- 1 Additional flood storage must be provided on top of ensuring no loss of fluvial and/or undefended tidal flood storage.”

We welcome that since the Regulation 18 consultation the wording has been updated to remove '*where feasible*' in relation to securing additional flood storage through development. However, we note that even without this wording, the policy is ambiguous as to how much additional storage must be provided on each site and would therefore potentially struggle to deliver additional storage.

To strengthen the policy, it would benefit from detailing how much additional flood storage each site should provide. This could be by requesting a certain percentage increase in flood storage, or a percentage reduction of built footprint on sites. This is similar to the 10% Biodiversity Net Gain (BNG) requirements set out in the Environment Bill. However, the implications and practicalities of this would need to be clearly thought out before including it as a policy requirement. For example, the BNG requirements are supported by the DEFRA metric tool to calculate increases. Similarly, guidance would need to be provided for how sites calculate percentage increases in flood storage.

We would like to note, however, that many sites' constraints often restrict the overprovision of storage. In our experience, sites often struggle to demonstrate no loss of flood storage, let alone provide additional storage. This may be due to the size of the plots or their chosen designs or viability assessments. Therefore, if the council truly seeks to secure additional flood storage, then stronger policy wording, and potentially supplementary guidance or supporting text, must be implemented.

If the wording is to be maintained as '*where feasible*' to allow more flexibility for sites, then an explanation should be provided to define '*feasible*' and we recommend setting criteria and a process for determining whether a site must provide it. Alternatively, the wording

'Unless exceptional circumstances are demonstrated for not doing so, additional flood storage must be provided on top of ensuring no loss of fluvial and/or undefended tidal flood storage' could be implemented. This would assign responsibility to the applicant to demonstrate whether additional storage or not is achievable.

Please note that our suggested wording above (E3) is draft wording and has not incorporated solutions to the issues we have raised above. These issues should be considered prior to finalising the additional fluvial and tidal flood storage policy wording.

Recommended action: We recommend you consider stronger policy wording for requiring additional fluvial and undefended tidal flood storage to be provided on site. Depending on the decision, supporting text may need to be added to the Local Plan.

Additionally, for the Environment Agency to maintain a consistent position across all areas, we will only be able to assess whether a site has demonstrated that there is no loss in flood storage. We will not be able to assess whether a site has demonstrated additional flood storage. You should consider how this policy will be assessed in practice e.g. whether case officers have the expertise required to assess flood storage calculations within an FRA.

Recommended action: We recommend you consider how whether additional flood storage has been delivered on site will be reviewed at the decision-making process. This should feed into decisions about how to word the policy.

Table 15.1 Flood Zones – Development Restrictions

The Flood Zone 3b section of Table 15.1 states that *'redevelopment of existing developed sites will only be supported if...a net flood risk reduction is proposed'*. In our Regulation 18 response we asked you to confirm what net flood risk reduction you are seeking. For example, increased flood storage, reduction in vulnerability, reduction of users etc. In our recent Duty to Cooperate meeting (held on 22.02.2022) you highlighted that you have decided to maintain this wording to give flexibility depending on the site. We support this stance, but recommend that you add some supporting text highlighting examples of different flood risk reduction options.

Recommended action: We recommend you add supporting text to expand on what you are seeking for *'net flood risk reduction'*.

The Flood Zone 3a (tidal/fluvial) and Flood Zone 2 section of Table 15.1 states that *'To provide safe refuge, and depending on location, finished floor levels for all development must be raised to a minimum of 300mm above the 1 in 100 fluvial level inclusive of an allowance for climate change, or an appropriate extreme water level as advised by the Environment Agency for defended tidal areas. Safe access and egress at a Low Hazard rating is required.'*

To ensure developments are safe for their lifetime, for all developments of all vulnerability classifications affected by fluvial flooding, all finished floor levels should be set at least 300mm above the 1 in 100 plus appropriate climate change allowance flood level. This is captured within the policy wording.

In tidal defended areas, only sleeping accommodation must be located on finished floor levels set at or above the appropriate extreme water level as advised by the Environment Agency. We welcome that the wording has been updated to remove reference to the 1 in

200 tidal flood level and replace this with *'appropriate extreme water level as advised by the Environment Agency'* in line with our Regulation 18 comments. However, the wording does not capture that it is only sleeping accommodation that must be raised above this flood level for defended tidal flood risk.

We note that the council may want to take a stronger stance in relation to raising finished floor levels above the flood level for tidal breach sites. Please discuss this stance internally and amend the policy wording as appropriate.

Recommended action: We recommend you update the wording to reflect that for tidal defended areas, only sleeping accommodation must be located above the extreme water level as advised by the Environment Agency. Please see our proposed wording ([in blue](#)) below.

We note that the wording '*to provide safe refuge and depending on location...*' comes before the finished floor level requirements. The Environment Agency is not responsible for assessing safe refuge or other emergency planning matters. Please discuss with your Emergency Planning Team whether any additional requirements should be incorporated with respect to safe refuge, safe access and egress and emergency plans. The Environment Agency recommends this finished floor level wording to the council for their policies as these requirements will ensure that developments are safe for their lifetime, in line with Paragraph 159 of the NPPF.

Also, we note that the wording '*... and depending on location...*' comes before the finished floor level requirements. We recommend that this is removed, as it would not be required if our proposed wording below ([in blue](#)) is adopted for detailing the finished floor level requirements.

Recommended action: We recommend you update the wording preceding the finished floor level requirements. Please see our proposed wording ([in blue](#)) below.

Table 15.1 Flood Zones – Development Restrictions, Flood Zone 3a and Flood Zone 2:

-

'In areas of fluvial flood risk, finished floor levels for all development must be raised to a minimum of 300mm above the 1 in 100 inclusive of an allowance for climate change flood level. In areas of defended tidal flood risk, as a minimum, all sleeping accommodation must be located on finished floor levels above the appropriate extreme water level as advised by the Environment Agency'.

Please note that the Environment Agency is not responsible for assessing Emergency Planning matters such as safe refuge, safe access and egress, or Emergency Plans. Please speak to the Emergency Planning Team to discuss these requirements and how they should be incorporated into the policy wording.

Table 15.2 Requirements for Basements in Flood Zones

This table sets out basement requirements in relation to different '*breach hazards*'. We understand this is an existing policy within the Richmond Local Plan (2018). As this is in relation to basements affected by '*breach hazards*' then this relates to defended tidal flood risk areas only. Any additions to this table regarding fluvial flood risk should not be included in the current table, or the table should be amended to reflect fluvial and tidal breach flooding.

The different requirements depending on different breach hazards were designed by the council and are stronger than the Environment Agency approach. Therefore, we recommend you discuss internally what you require for basements in breach hazard areas and then amend the policy to reflect this.

To clarify, the Environment Agency position on basements is as follows:

For areas affected by fluvial flooding – self-contained residential basements and bedrooms at basement levels are not permitted. In these locations, it should be a requirement that all basements must have access threshold levels set to a minimum of 300mm above the 1 in

100 inclusive of climate change flood level. All basements must also have internal staircases to access floors set at a minimum of 300mm above the 1 in 100 inclusive of climate change flood level.

For areas tidal defended areas - no self-contained residential basements should be permitted. All access threshold levels must be set at or above the appropriate extreme water level as advised by the Environment Agency. They must also have internal staircases to access floors set at or above the appropriate extreme water level as advised by the Environment Agency. Your policy does not allow any bedrooms at basement level. Whilst we support this stance, it is stronger than our own stance of allowing basement bedrooms in tidal defended areas as long as there is an internal staircase access and threshold levels set above the flood level.

Recommended action: We strongly recommend that you either remove references to fluvial flooding from Table 15.2 Requirements for Basements in Flood Zones, or, update the table title and headings to incorporate fluvial and undefended tidal (breach hazards).

Part E

Part E3 states applicants will have to demonstrate that *'There should be no loss of flood storage in areas affected by fluvial flooding and any increase in built footprint within the fluvial 1 in 100 (inclusive of climate change allowance) flood extent must be compensated for on a level for level, volume for volume basis'*.

We welcome that this has been added in response to our Regulation 18 comments, where previously flood storage compensation was not mentioned at all in Policy PL 12. However, if our proposed wording above ([blue E: Fluvial and undefended tidal flood storage](#)) is adopted, then this can be removed from the 'Sustainable Drainage' Part E section.

If our proposed wording is not adopted, we would recommend keeping Part E3 – with undefended tidal flood storage wording added – but separating it from the 'Sustainable Drainage' (Parts E, F and G) section. This is because the term *'sustainable drainage'* is usually associated to surface water management and therefore it is confusing to contain information about fluvial and undefended tidal flooding here.

Recommended action: We recommend that Part E3 is removed, subject to our proposed wording on 'fluvial and undefended tidal flood storage' being incorporated.

If our suggested policy wording regarding additional fluvial and undefended tidal flood storage is adopted ([blue E parts 1,2,3](#)) then the requirement for additional surface water attenuation (contained within existing Part C) may need to be incorporated into this part of the policy. We strongly recommend discussing this wording with the LLFA.

Recommended action: consider adding the wording for additional surface water attenuation requirements, in discussion with the LLFA.

Part H

Part H3 states *'That any physical structures are set back from river banks and existing flood defence infrastructure unless it can be clearly demonstrated that the effectiveness of such infrastructure would not be compromised (the distances being 16 metres for the tidal Thames and 8 metres for other rivers including those culverted)'*.

We welcome that the set back requirements have been incorporated into Policy LP 12 following our Regulation 18 response. However, set back from flood defences would be required even if evidence was submitted to demonstrate that building closer to the defences would not impact their effectiveness. This is because the space is required for future flood risk management. Sufficient space is required where defences may need emergency works, maintenance and upgrading to ensure this can be carried out in a cost effective way, as supported by Policy LP12 Part H2. In some recent cases, developers have offered extremely minimal set backs from flood defences and demonstrated that certain technological strategies mean the defences can still be maintained and upgraded. These technological solutions are often high cost. The larger the set back the more strategies are available for future maintenance and upgrading in a cost effective way.

This is also supported by the London Plan (2021) Policy SI 12 Flood risk management part F which states *'Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way'*.

This is further supported by the NPPF (2021) paragraph 161b which states that plans should manage flood risk and the future impacts of climate change by *'safeguarding land from development that is required, or likely to be required, for current or future flood management'*.

We note that this set back requirement also ties into the council's other aims where you seek space next to the river for public walkways (including the Thames Path) and cycle paths for more active and sustainable travel. This is set out in Policy LP 52 Public Transport and Infrastructure part B, where you promote at least 6 metre wide paths for the Thames and at least

3 metre wide for the Wandle. Policy LP 49 Sustainable transport further promotes this and encourages '*green and blue infrastructure [to be] improved to create more attractive neighbourhoods for people*' (Part B5). Supporting text paragraph 21.49 of Policy LP 59

Riverside uses, including river-dependent, river-related and adjacent uses states '*New development will be expected to provide high-quality public realm that is safe and attractive and should, wherever possible, improve access and provide opportunities for the public to enjoy the rivers*'. Having a wider buffer zone adjacent to rivers would allow space for these improvements to be made and deliver wider placemaking outcomes as well as protecting flood defences.

Furthermore, the set back is required for enhancements to the biodiversity of rivers which is another aim for the council. Please see our biodiversity section for further information.

We also recommend reviewing the Thames Estuary 2100 Plan (available here: Thames Estuary TE2100 Plan - GOV.UK (www.gov.uk)) for further information about the importance of leaving space to manage flood defences.

We note that the Richmond Local Plan (2018) Policy LP 21 Part D3 has specified the 8m and 16m set back requirements in its existing policies. We hope this can alleviate any of your concerns with adopting this wording.

Therefore, we recommend that the wording of Policy LP12 Part H3 is updated. We recommend the following wording: '*All development should be set back 16 metres from the landward side of tidal flood defences, and 8m from the top bank of all other main rivers (including from the outer edge of culverted main rivers)*'.

Recommended action: We strongly recommend that you update the wording for Policy LP 12 Part H3 as above.

Part 7 states '*Culverting of water courses and building over culverts will be resisted unless it can be clearly demonstrated that such approaches are necessary in order to achieve the delivery of development. Deculverting is encouraged where possible*'.

We do not support this wording. The Environment Agency would object to any development that proposes building on top of an existing culvert or that proposes additional culverting of a main river.

Firstly, allowing building on top of a culvert would be contradictory to part H3 of Policy LP

12 that requires set back. It would also restrict access to the culvert and space should it be needed for future maintenance, upgrading or emergency works and could therefore increase flood risk elsewhere in the future. It also contradicts Policy LP60 Part C which currently states '*The culverting of river channels and watercourse will not be permitted, and the naturalisation of river channels and watercourses will be sought as part of development proposals where appropriate and feasible*'.

Also, culverting a watercourse would be contrary to policies seeking the protection and enhancement of blue infrastructure and biodiversity and would not be acceptable in any situation. It would also be contrary to the Water Framework Directive (2003) which seeks to enhance and prevent further deterioration of water bodies.

We would find this policy unsound should this wording, allowing the culverting and building over culverts in some situations, remain in the plan as it is against the London Plan (2021) Policy SI 12 Flood risk management; the NPPF (2021) Paragraphs 159 and 161; the Water Framework Directive (2003) and supporting biodiversity policies.

We strongly recommend that the wording of Policy LP 12 Part H7 is returned to the Regulation 18 version with some amendments. We recommend the following wording: '*The culverting of watercourses and building over culverts will not be permitted. Deculverting and the naturalisation of watercourses is encouraged where possible*'.

Recommended action: We strongly recommend you update the wording to Policy LP 12 Part H7 as above.

Part I

We welcome that Part I addresses that multiple benefits can be achieved by addressing flood mitigation opportunities into the design of the scheme.

As discussed at the recent Duty to Cooperate meeting, we would welcome receiving an informal consultation regarding the revised wording to Policy LP 12 Water and Flooding to help finalise the policy wording.

**Change(s)
considered
necessary**

**Wishes to attend
Hearing Session**

Reason why

Council Response

LP12 Part A - comment agreed.

LP12 Part B - comments agreed. The Council proposes to amend the wording to remove the part of the sentence that states that a Flood Risk Assessment is not required. The Council also proposes to amend the wording so the Sequential Test is not limited in its application to windfall major development and to clarify the term 'minor development' in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The Council also propose to update the formatting for part B5.

LP12 Part B - sequential approach to the layout of the site. Comments noted. The policy is considered to be sound as reference to site specific consideration of the layout of development is contained in LP12 C: 'Development will be guided to areas of lower risk, both on-site and by applying the 'Sequential Test' as set out in national policy guidance, and where required, the 'Exception Test'.'

LP12 Part C - The EA have requested that Part C is split into separate lettered points. Comment agreed. It is agreed that the technical nature of this part of the policy necessitates an amendment to clarify the requirements and is proposed with additional amendments as described in response to other EA comments as made. Part C is proposed to be modified into separate paragraphs under the heading 'Flood Risk Management'. Also, under the same heading, a new part 'D' is proposed to be added as part of the separate paragraphs to address the EA's concerns on surface water, fluvial / undefended tidal flood storage.

LP12 Part C - remove repetition about applying the Sequential Test. Comment noted. The sentence is considered to be sound as part B criteria 1-5 reference the circumstances where the sequential test has been passed and the first sentence of part C states that the sequential test will be applied in general terms. It is agreed that clarification could be provided to acknowledge that Part B sets out the circumstances where the Sequential Test is considered to have been passed.

LP12 Part C - recommend strong policy wording for requiring additional fluvial and undefended tidal flood storage to be provided on-site. Comment noted. There is currently no mechanism to justify what percentage increase in flood storage would be appropriate and this is something that Council may review in the future. It is considered that, as part of the FRA, applicants

could review options for additional storage and include this where feasible. It is acknowledged that it may not be possible for applicants to include additional storage so the further wording regarding feasibility i.e by including the words: 'Unless exceptional circumstances are demonstrated for not doing so' is considered appropriate.

Regarding the comment on the EA not being able to assess additional flood storage, the Council's Lead Local Flood Authority officers review flood storage options and feasibility as part of the assessment of a drainage scheme so wording on how additional storage might be delivered on site is not required.

Regarding the comment requesting further wording on what is sought for 'net flood risk reduction', the Council considers that the applicant's FRA would detail the nuances of possible net flood risk reduction and depends on the circumstances of the site. Therefore, it is the Council's preference to keep the existing wording unchanged. No changes considered necessary.

LP12 Table 15.1 - Regarding the comment concerning the location of sleeping accommodation and finished floor level requirements - Comment agreed. To clarify that developments will remain safe for their lifetime, it is agreed that the text of Table 15.1 should be amended for flood zones 2 and 3a.

LP12 Table 15.2 - Comment noted regarding the comments concerning basements in flood zones. The Council's stance allows bedrooms at basement level where the SFRA has demonstrated that the development passes the Exceptions Test and are located in areas of low or no breach hazard. The policy requires that appropriate access threshold levels and internal staircasing must be demonstrated as advised by the Environment Agency or that a permanent barrier is in place to prevent flooding from entering and sleeping accommodation. It is considered that Council has the evidence to do this as a result of the breach hazard modelling of the SFRA.

However, it is acknowledged that the fluvial flooding references are currently considered under the same heading as the areas of breach hazard – i.e low if no breach hazard, which could be confusing as references to fluvial flooding requirements are already contained in table 15.1. It is therefore proposed that table 15.2 is modified to delete references to fluvial flooding requirements as they are already covered in table 15.1.

LP12 H (3) - Regarding the EA's comment to update the wording of the distance development is set back - comment agreed and the suggested wording is proposed to be included.

LP12 H (7) - Regarding the wording of the policy to resist developing over culverted rivers - Comment agreed. However the word 'support' rather than 'permitted' is considered to be more appropriate in this context.

Welcome part LP12 (I) - support noted.

Proposed Change

Amend Policy LP12 A to read:

'All planning applications will need to clearly demonstrate that the proposals avoid, minimise, or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater, flooding from sewers, take account of climate change (including predicted future changes), and would not increase flood risk elsewhere.'

Amend the 2nd sentence of Policy LP12 B to read:

'The Sequential Test is considered to have been passed, and a Flood Risk Assessment will not be required, is not a major development or at least one of the following applies if the proposal meets one of the following criteria:'

Amend Policy LP12 B. 4. to read:

'Minor development*, conversions and change of use(except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site.)'

Insert footnote to Policy LP12 to read:

**Minor development is defined in Section 1b 'Interpretation of Table' of Schedule 4 'Consultations before the grant of permission' of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (The Town and Country Planning (Development Management Procedure) (England) Order 2015 (legislation.gov.uk)) and in Paragraph: 046 Reference ID: 7-046-20140306 of the Planning Practice Guidance (Flood risk and coastal change).*

Delete Policy LP12 B. 5 and move within new paragraph E to read:

The application of Sequential Test

A. Future development in Zone 3a and Zone 2 will only be considered if the 'Sequential Test' has been applied and the Exceptions Test passed in accordance with national planning policy and guidance. *For development sites falling outside of the areas below, the default area of search for the Sequential Test to be applied will be the borough administrative area, unless justification is provided for a smaller area as described in the Strategic Flood Risk Assessments.....'*

LP12 Part B - no change considered necessary to the wording which covers the sequential approach as to the layout of the site.

LP12 Part C - Policy LP12 C. is proposed to be moved as new paragraphs under 'Flood Risk Management' and split to read:

G. B. Development will be guided to areas of lower risk, both on-site and by applying the 'Sequential Test' *unless already passed under part E below*, as set out in national policy guidance, and where required, the 'Exception Test'. Inappropriate developments and land uses will be refused in accordance with national policy and guidance, and the Council's Strategic Flood Risk Assessment (SFRA).

C. In flood zones 2 and 3, all planning applications (or other relevant applications) on sites of 10 or more dwellings or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.

D. Where a Flood Risk Assessment is required, *applicants will be required to demonstrate that their proposal does not increase, and reduces surface water, fluvial and/or tidal flood risk elsewhere by ensuring that:*

1. Any loss of fluvial flood storage within the 1 in 100 plus appropriate climate change allowance flood extent must be compensated for on a level for level, volume for volume basis. Proposals must demonstrate that fluvial flood flow routes are not impeded.

2. In undefended tidal areas there is no increase in built footprint or raising of ground levels. Where water compatible structures are acceptable, such as pontoons or slipways, they must be designed to minimise the loss of flood storage i.e. floodable, hollow structures.

3. Unless exceptional circumstances are demonstrated for not doing so, opportunities to provide additional flood storage must be considered and be designed into the development, in addition to ensuring no loss of surface water, fluvial and/or undefended tidal flood storage.

on-site attenuation solutions to alleviate fluvial and/or surface water flooding over and above floodplain compensation is required. The consideration of potential increases in flood risk off-site where development would result in a loss of floodplain storage is also required with suitable mitigation proposed in accordance with the advice of the Environment Agency and Lead Local Flood Authority.

Amend Policy LP12 Table 15.1, Zone 3a to read:

To provide safe refuge, and depending on location, finished floor levels for all development must be raised to a minimum of 300mm above the 1 in 100 fluvial level inclusive of an allowance for climate change, or an appropriate extreme water level as advised by the Environment Agency for defended tidal areas. *In areas of fluvial flood risk, finished floor levels for all development must be raised to a minimum of 300mm above the 1 in 100 inclusive of an allowance for climate change flood level. In areas of defended tidal flood risk, as a minimum, all sleeping*

accommodation must be located on finished floor levels above the appropriate extreme water level as advised by the Environment Agency. Safe access and egress at a Low Hazard rating is required.

Amend Policy LP12 Table 15.1, Zone 2 to read:

To provide safe refuge, and depending on location, finished floor levels for less and more vulnerable development must be raised to a minimum of 300mm above the 1 in 100 fluvial level inclusive of an allowance for climate change, or an appropriate extreme water level as advised by the Environment Agency for defended tidal areas. In areas of fluvial flood risk, finished floor levels for all development must be raised to a minimum of 300mm above the 1 in 100 inclusive of an allowance for climate change flood level. In areas of defended tidal flood risk, as a minimum, all sleeping accommodation must be located on finished floor levels above the appropriate extreme water level as advised by the Environment Agency. Safe access and egress at a Low Hazard rating is required.

Amend table 15.2 row 2 column 2 (Flood Zone 3a) to read:

•New basements:

•If the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are not self-contained, or, in locations at risk of fluvial flooding, are not used for bedrooms.¹

Amend table 15.2 row 2 column 2 (Flood Zone 3a) to read:

'If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must:

• have safe access threshold levels and internal staircases provided to access floors to a minimum of 300mm above the 1 in 100 fluvial level inclusive of an allowance for climate change, or an appropriate extreme water level as advised by the Environment Agency for defended tidal areas.'

Amend table 15.2 row 2 column 2 (Flood Zone 2) to read:

•New Basements:

•If the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are not self-contained, or, in locations at risk of fluvial flooding, are not, in locations at risk of fluvial flooding, are not used for bedrooms:

•Existing Basements:

•Basement extensions, conversions or additions maybe permitted for existing developments where they are not self-contained, or, in locations at risk of fluvial flooding, are not used for bedrooms:

Amend Table 15. row 2, column 1 (flood zone 3a) to read:

'Flood Zone 3a (*Tidal*)'

Amend Table 15.2 row 3, column 1 (flood zone2) to read:

'Flood Zone 2 (*Tidal*)'

For consistency with the information set out regarding existing basements in flood zone 2 it is proposed to add the following wording to row 2 column 2 (flood zone 3a) following the New basements bullet points and paragraph:

In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA):

• Existing basements:

• No basement extensions, conversions or additions for 'Highly Vulnerable' uses.

• 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed.

In areas of Low or No Breach Hazard (as set out in the Council's SFRA):

• Existing basements:

• Basement extensions, conversions or additions may be permitted for existing developments where they are not self-contained.'

It is also proposed to modify table 15.1 to allow for the consistency of these proposed changes to be accommodated.

Amend Table 15.1 row 3, column 2 (Zone 3a) to read:

'Self-contained residential basements will not be permitted, in locations at risk of fluvial, or tidal defended flooding.

Bedrooms at basement level will not be permitted in fluvial flood risk areas subject to with the exception of the requirements set out in Table 15.2.'

Amend Table 15.1 row 4, column 2 (Zone 2) to read:

'Self-contained residential basements will not be permitted, in locations at risk of fluvial, or tidal defended flooding.

Bedrooms at basement level will not be permitted in fluvial flood risk areas subject to with the exception of the requirements set out in Table 15.2.'

Additionally, for clarification and consistency it is proposed to remove the words 'Tidal/Fluvial' from table 15.1 as follows:

'Zone 3a (~~Tidal/Fluvial~~)'

Delete LP12 E3(3) as follows:

There should be no loss of flood storage in areas affected by fluvial flooding and any increase in built footprint within the fluvial 1 in 100 (inclusive of climate change allowance) flood extent must be compensated for on a level for level, volume for volume basis.

Add the following wording to the new part of 'D' of LP12 under 'Flood Risk Management'

Unless exceptional circumstances are demonstrated for not doing so, opportunities to provide additional flood storage must be considered and be designed into the development in addition to ensuring no loss of surface water, fluvial and/or undefended tidal flood storage.

Amend Policy LP12 H (3) to read:

'All development should be set back 16 metres from the landward side of tidal flood defences, and 8m from the top bank of all other main rivers (including from the outer edge of culverted main rivers)'. That any physical structures are set back from river banks and existing flood defence infrastructure unless it can be clearly demonstrated that the effectiveness of such infrastructure would not be compromised (the distances being 16 metres for the tidal Thames and 8 metres for other rivers including those culverted):

Delete part 7 of LP12 H and add wording to read:

7. The culverting of watercourses and building over culverts will not be supported. Deculverting and the naturalisation of watercourses is encouraged where possible. Culverting of water courses and building over culverts will be resisted unless it can be clearly demonstrated that such approaches are necessary in order to achieve the delivery of development. Deculverting is encouraged where possible.

Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	306
Title	LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses
Number	Policy 70
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Policy LP 59 Riverside Uses, including River-dependent, River-related and adjacent Uses</u></p> <p>We welcome that Part A 1-8 considers multiple aspects of development along river corridors by mentioning flood risk, biodiversity and public space considerations. This supports the riverside strategy approach encouraged by the Thames Estuary 2100 Plan.</p> <p>We welcome that Part A8 is incorporated. We welcome that Part B reiterates that only water compatible uses will be acceptable in river channels. We recommend this is strengthened by referencing Policy LP12, potentially in brackets like other bulletpoints do.</p> <p>Recommended action: Add reference to Policy LP 12 to Part A8 and Part B of Policy LP 59.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses is considered sound, however, to ensure that this policy and LP12 Water and Flooding are correctly read together reference to it should be included in LP59.
Proposed Change	<p>Amend the wording to LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses as follows:</p> <p>A. New development on sites adjoining the River Thames, River Wandle, and Beverley Brook will be supported where it:</p> <p>...</p> <p>8. does not harm the stability or continuity of tidal or flood defences <i>(in accordance with LP12 Water and Flooding)</i>.</p>

	B. Only river related or water compatible uses will be acceptable in river channels (<i>in accordance with LP12 Water and Flooding</i>).
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	307
Title	LP53 Protection and Enhancement of Green and Blue Infrastructure
Number	Policy 64
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	LP53 Protection and Enhancement of Green and Blue Infrastructure We support the inclusion of a policy which aims to create a comprehensive network of blue and green infrastructure. This ties strongly Environmental Objective 1 as increasing habitat connectivity through the provision of blue and green infrastructure increases the resilience of species to the impacts of climate change.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	

Comment ID	308
Title	LP55 Biodiversity
Number	Policy 66
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>LP55 Biodiversity</u></p> <p>We are pleased to see that this policy (Paragraph 21.32) states that your authority will incorporate the mandatory requirement for Biodiversity Net Gain (BNG) into the Local Plan once it has been incorporated into the Town and Country Planning Act. Whilst the Environment Bill has achieved Royal Assent, there are still a number of elements of BNG requirements under consultation. This includes what type of development will require BNG and technical details surrounding the use of the metric for subtidal habitats.</p> <p>There are a number of reasons why would recommend writing a more Borough specific BNG policy in addition to the mandatory requirements, once BNG has been incorporated into the Town and Country Planning Act. A locally-specific policy will enable you to set out which strategies you require developers to take into account in delivering BNG, e.g. Green Infrastructure strategies, Local Nature Recovery Strategies (LNRS) . Including BNG in the Local Plan can also link biodiversity to your strategic objectives and overall place-making, enabling a more holistic approach.</p> <p>We would refer you to Box 4.1 of CIEEM's Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide for best practice guidance on writing a BNG policy.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. The Council will consider preparing specific Biodiversity Net Gain policies for the next Local Plan.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	

Comment ID	309
Title	LP58 River Corridors
Number	Policy 69
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>LP58 River Corridors</u></p> <p>In our comments on this Policy in our Regulation 18 response we recommended that reference to the riverside strategy approach as outlined in the Thames Estuary 2100 plan. We are pleased to see that this change has been incorporated in part (E) of this policy. We are also supportive of part (B) of this policy, the requirement to protect and enhance blue infrastructure assets ties in with the requirements of LP55 Biodiversity and future mandatory Net Gain.</p> <p>We have the following comments in relation to the importance of buffer zones around main rivers for the benefit of biodiversity. In addition to flood risk benefits, providing buffer zones of at least 16m for the Tidal main rivers (including tidally influenced sections of the Thames) and 8m for all other main rivers also provides a host of other benefits to riverine habitats:</p> <ul style="list-style-type: none"> • Providing space for functioning riverine habitats. • Creating habitat connectivity along the river corridor. • Reducing the levels of diffuse pollution reaching the watercourse. • Providing space for natural geomorphological processes to occur. <p>Additionally, the Rivers section of the DEFRA Biodiversity metric penalises any encroachment of development within 10m of the top banks of main rivers. Therefore, in order to synergise with mandatory BNG requirements, we would encourage policies that require 8m buffer zone as a minimum.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. LP12 Water and Flooding (H)3 incorporates the suggested buffer zone requirements and LP58 River Corridors (C) links itself to LP12 directly. However, for the reasons stated by the EA, it is considered that the policy should more explicitly reference the exact encroachment distances in this policy and could be included.
Proposed Change	<p>Amend wording in policy LP58 River Corridor as follows:</p> <p>C. Measures to protect and enhance rivers as a valuable resource for wildlife and biodiversity, including wildlife corridors and green chains will be supported (see LP55 (Biodiversity) and LP42 (Water and Flooding)). <i>Development should not encroach within a minimum of 16m (tidal Thames) or 8m (other rivers including those culverted) of the top of the river bank.</i></p>

Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	310
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Site Allocations and Place-making Policies</u></p> <p>We are pleased to see that the vast majority of our comments in relation to biodiversity have been included in the plan's site allocation and place making policies.</p> <p>Many of our comments related to buffer zones set back requirements and biodiversity net gain, which are also set out elsewhere in general policies of the plan.</p> <p>Please see our comments below which relate to site allocations and place making policies where we feel our comments at the Regulation 18 Stage have not been incorporated fully into policy, or where further improvements to wording should be made.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency

Agent Full Name	
Agent Organisation Details	
Comment ID	311
Title	WT5 Keltbray site, Wentworth House and adjacent land at Dormay Street, SW18
Number	Statement 5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>WT5, WT6 & WT7, Frogmore cluster</i></p> <p>We recommend that requirement for a wide buffer area between the river and new development. The buffer habitat should include providing estuary edge habitats, and integrate these around the public access improvements, including those to the Wandle Trail.</p> <p>Terrestrial biodiversity improvements within the buffer zone should be in addition to restoring more natural margins to the watercourse.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is agreed that a buffer is required and Paragraphs 4.39 and 4.50 require the consideration of open space and biodiversity requirements. Buffer zones and requirements for estuary edges are also captured in policies LP55 Biodiversity and LP58 River Corridors.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	312
Title	WT11 Western Riverside Waste Transfer Station, SW18
Number	Statement 11

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>WT11 Western Riverside Waste Transfer Station</i> Our comments at Regulation 18 regarding this site have not been incorporated into the plan. We request that any redevelopment of the site should consider alternative wharf frontage designs that allow for naturalisation of the edge of the river Thames whilst continuing to provide river access.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	LP58 River Corridors does require new developments to comply with the Estuary Edges guidance which will ensure the naturalisation of the edge of the river Thames. This may come in the form of wharf frontage designs but the site allocation is considered sufficiently flexible to allow naturalisation to come forward.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	313
Title	WT20 Southside Shopping Centre, Wandsworth High Street, SW18
Number	Statement 20
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>WT20 Southside Shopping Centre, Wandsworth High Street</i>

	We are pleased to see the inclusion of a requirement to explore deculverting the Wandle at this location. It is prudent to note that any deculverting would need to ensure it does not increase flood risk elsewhere in line with national policy and therefore is likely to need to be supported by hydraulic flood modelling.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	314
Title	NE9 Kirtling Wharf, Nine Elms, SW8
Number	Statement 26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>NE9, NE11 Kirtling Street Cluster and NE10 Middle Wharf, Nine Elms</i> In line with our previous comments regarding these sites, we request that where Safe-guarded wharves prevent enhancement as part of the scheme, proposals should consider terrestrial improvements and offsite enhancements that provide net gains for the River Thames.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Terrestrial improvements and offsite enhancements would be considered at the planning application stage as part of the discussion on LP12 Water and Flooding.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	315

Title	RIV6 36 Lombard Road, SW11
Number	Statement 61
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>RIV6 36 Lombard Road</i> This development site has the potential to include estuary edges enhancements to ensure a Biodiversity Net Gain to the riverside. We would like to see this mentioned in this site allocation.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Estuary Edges are captured in LP58 River Corridors. As the Local Plan is to be read as a whole it is considered sufficient for it to be left unchanged.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	316
Title	PM10 Wandle Valley
Number	Policy 11
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p><i>PM10 The Wandle Valley</i></p> <p>We feel that this place making policy could be stronger. Whilst it is mentioned that any new development could along the Wandle Valley should “<i>respect the small scale of the river corridor, offer public access and provide positive frontage to the riverside</i>”, improvements could be made in the text so it is more in line with Paragraph 180 of the NPPF.</p> <p>Improved access along the riverside must not lead to a loss of biodiversity and must therefore ensure that there is no increase in lighting or disturbance to the river overall, by ensuring a net gain in biodiverse habitats.</p> <p>Existing green spaces along the river should be scoped for providing potential sites for the delivery of Biodiversity Net Gain along the river where other urban sites are unable to achieve a significant uplift. The policy should state that all management plans for riverside public space must include aims to restore riverside habitat and in-channel habitat where desirable.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Local Plan should be read as a whole and what has been set out here is captured in LP55 Biodiversity and other policies in the Green and Blue Infrastructure and the Natural Environment.
Proposed Change	No change considered necessary.
Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	317
Title	WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18
Number	Statement 67
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley</i></p> <p>We are pleased to see that this Site Allocation includes the requirement for “<i>a landscape management and maintenance plan will be required setting out the aspirations for the landscape treatment of the River Wandle frontage.</i>”</p>

Change(s) considered necessary	We feel that the policy could be improved by stating that any development proposals should also include the restoration of natural river banks, and in-channel resoration, in order to deliver Biodiversity Net Gain to the river in line with Policy LP55.
Wishes to attend Hearing Session	
Reason why	
Council Response	Site Allocations are to be read alongside all the other policies in the Local Plan.
Proposed Change	No change considered necessary

Consultee Full Name	Phil Kapur
Consultee Organisation Details	Sales and Development Director Henley Construction Ltd
Agent Full Name	Mr Adam Garcia
Agent Organisation Details	CBRE
Comment ID	318
Title	RIV8 19 Lombard Road, 80 Gwynne Road, SW11
Number	Statement 63
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>On behalf of our client, Henley Construct Ltd., CBRE has been instructed to submit representations to the Wandsworth Draft Local Plan: Publication Version.</p> <p>Henley Construct Ltd. has a development agreement across 80-100 Gwynne Road within LB Wandsworth. Towards the end of 2021, a pre-application meeting was held between officers and Henley, in order to understand the Local Planning Authority's position on options for redeveloping the site. At that time, we were advised to wait until such time that the Publication Version of the Council's Draft Local Plan was made available, which would be critical in understanding how the Council intends to guide redevelopment of the site.</p> <p>The Site</p> <p>The Site is currently occupied by a 2-storey industrial building, located on a rectangular footprint, bound by Gwynne Road to the south and Lombard Road to the west. The building was most recently occupied by a plumber's merchant (Fraser and Ellis) who have relocated to alternative premises within Wandsworth. Wrapping the site, to the north and east, is the adjacent Safestore site. Figure 1 sets out the ownership arrangements (see separate letter).</p> <p>The Site and the adjoining Safestore site are allocated within the Draft Local Plan as 'RIV8 19 Lombard Road, 80 Gwynne Road, SW11'. The Site Allocation is featured within the existing Local Plan under the Site-Specific Allocations Document (SSAD) (2016), as Site Allocation 10.13.</p> <p>The area is at a formative stage of transformation, most prominently in the form of the 28-storey Lombard Wharf to the west of the site, and at 28 Gwynne Road, a residential building of 14 storeys, to the east.</p> <p>Site Allocation RIV8 19 Lombard Road, 80 Gwynne Road, SW11</p> <p>We have reviewed the proposed wording for the Site Allocation. Whilst we support the identification of the site as being suitable for redevelopment, we do have some concerns as set out below.</p> <p>Paragraph 11.60 – Building Heights Current words:</p> <p>In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-B1-03. The maximum appropriate height range for the zone is 7 to 20 storeys, and the maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Midrise Buildings).</p> <p>Appendix 2 – TB-B1-03</p>

Tall building zone TB-B1-03 shows Map 23.5 (set out in Figure 2 within the accompanying letter). The map indicates a lighter shaded area over the site in question.

Evidence Base – Urban Design Study

The map at Figure 2 within the accompanying letter is predicated on the Urban Design Study 2021, by Arup, which forms part of the Evidence Base for the Draft Local Plan. The Site Allocation within the ‘Riverside Cluster Plan’ sets out specific building heights (see Figure 3 within the accompanying letter). Our client’s portion of the site allocation is envisaged to deliver a scheme of 6-10 storeys.

Comments:

It would appear that tall building zone TB-B1-03 reflects the heights set out within the Riverside Cluster Plan within the Urban Design Study 2021.

Moreover, supporting paragraph 14.31 (to Policy LP4 Tall and Mid-Rise Buildings) states that:

“The tall building maps included at Appendix 2 to this Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. Development proposals exceeding the appropriate height will not be supported on design grounds.”

We consider that this approach does not pay due regard to the site’s context. To the west of the site is Lombard Wharf, a residential building of 28-storeys and to the east of the site is 28 Gwynne Road, a residential building of 14 storeys. Additionally, to the north, beyond the allocation, is the Overground Line from Clapham Junction towards Imperial Wharf, and beyond that, the open space of Fred Wells Park. To restrict development on this site at 10 storeys would not be consistent with Policy D3 of the London Plan, which states that:

“all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth”.

In this policy context, and from a townscape perspective, the logical approach for a proposal on this site would be to mediate between the 28-storey Lombard Wharf and the 14-storey 28 Gwynne Road, delivering a natural step down in building heights. Given that there is not a natural stepping in the townscape as one moves north along Lombard Road (due to the combination of the railway line and open space), the logical approach, in townscape terms, is to provide a sense of presence and identity to the northern part of Lombard Road, as a context where tall buildings will come forward. This would ensure that development on the site would reinforce the spatial hierarchy of the local and wider context, aiding legibility and wayfinding and maintaining the prominence and subservience of Lombard Wharf, which sits on the bank of the River Thames. The ‘mounding’ approach to tall building areas proposed by the Urban Design Study is a simple, broad-brush one (necessarily, as it is being brought forward on a Borough-wide basis). In each case, it requires careful modulation and consideration. For the reasons outlined above, this is a site that should not be viewed as an ‘edge of area’ site where development should be lower.

Therefore, we would propose that tall building zone TB-B1-03 is amended to allow for a building up to 20-storeys, mediating between these two buildings and enabling a development that would respond to local context. We see no reason why a development of this height would not be capable of being acceptable, subject to an iterative design process in conjunction with the Local Planning Authority.

The proposed revisions would ensure that the allocation is in conformity with the London Plan, as required by Section 24 of the Planning and Compulsory Purchase Act (2004). It also ensures that the allocation is sufficiently flexible to be effective (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which:

- Optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (NPPF Para 130.e). Considering the site’s context, the current site allocation is not considered to optimise site capacity;
- Makes effective use of land (NPPF Para 120) by promoting under-utilised buildings where this would help to meet identified needs for housing where such sites can be used more effectively.
- Makes efficient use of land (NPPF Para 124) taking into account viability and by promoting regeneration and change.

Summary

In conclusion, we are supportive of the principle of the Site Allocation but believe the above amendments will serve to allow for any forthcoming scheme to be developed effectively through the design-led approach, which optimises the site’s capacity, and accompanied by the necessary technical documents that show any forthcoming proposals in their townscape context.

It is our view that, in absence of these amendments, the site allocation will not conform with the London Plan and due to this, it is unlikely to be effective. Effectiveness is one of the tests of soundness within the NPPF.

Given the stage of the plan, our client wishes to reserve the right to be able to participate in any forthcoming Examination in Public.

**Change(s)
considered
necessary**

This has been set out in the previous section.

Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	As per our representations, we consider elements of the plan to be unsound and therefore, we wish to participate.
Council Response	<p>Comment noted. Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p> <p>Development here needs to protect the character of the River Thames. The tallest buildings should be set within the plot and step down appropriately to adjacent roads, buildings and also the approach to the listed Battersea Railway Bridge adjacent to the site.</p> <p>Development proposals exceeding the appropriate height will not be supported on design grounds. In accordance with London Plan Policy D3, optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The Urban Design Study balances the demands (potentially competing) between optimising the use of sites to deliver required growth, and ensuring that well-designed places that reflect existing character are delivered.</p> <p>The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. It would be up to applicant to justify an alternative approach to the principle of the location of taller elements of a scheme compared to that of the shading as set out within the tall building zones. The shaded area of the site within TB-B1-03 zone is lighter compared to that of the more central area of this zones which illustrates that lower storey heights of the identified range are considered appropriate.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	CBRE Global Investors
Consultee Organisation Details	
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	319
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>REPRESENTATIONS IN RESPECT OF 20 LYDDEN ROAD, LONDON, SW18 4LR</p> <p>We write on behalf of our client, CBRE Global Investors, who are the owners of 20 Lydden Road, London, SW18 4LR which is a site within the currently designated Lydden Road Locally Significant Industrial Area ('LSIA') in the adopted Local Plan.</p>

We refer to the client as 'CBREGi' / 'the Client' in the remainder of this letter. The representations are submitted on behalf the Client in respect of the current consultation exercise on the 'Publication' Draft Local Plan as they wish to maintain their position as an interested stakeholder in the Lydden Road LSIA.

BACKGROUND AND CONTEXT TO THESE REPRESENTATIONS

On behalf of our Client, we previously wrote to you in February 2019, in response to the first stage of the Local Plan Full Review (Issues and Options). Subsequent to this, we attended the Lydden Road Stakeholder Workshop on 29 November 2019, held to inform the Employment Land and Premises Study, with policy officers and the Council's consultants Aecom, together with landowners in the Lydden Road area. We would like to again take the opportunity to thank officers and Aecom for their time at this meeting.

We submitted representations on the Regulation 18 'Pre-Publication' Draft Local Plan in March 2021. We attach a copy of these representations at **Appendix 1** for reference.

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

CLOSING

These representations are submitted on behalf of CBREi in respect of 20 Lydden Road, London, SW18 4LR which is a site within the currently designated Lydden Road Locally Significant Industrial Area.

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

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted
Proposed Change	No change considered necessary
Consultee Full Name	CBRE Global Investors
Consultee Organisation Details	
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	320

Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>CONSIDERATIONS</p> <p><i>Protection and Retention of Industrial Floorspace</i></p> <p>On behalf of our Client, we were disappointed to note that the Site remains within the designated Lydden Road LSIA in the 'Publication' Draft Local Plan, where industrial uses are to be protected and retained.</p> <p>Emerging Policy LP34 (Managing Land for Industry and Distribution) states that in LSIA's, the redevelopment of sites must provide at least the full replacement of existing industrial floorspace. Part B (3) of the policy states that the intensification of the sites for industrial purposes through increased floorspace will be strongly encouraged.</p> <p>Part B (4) of the Policy states that development proposals for other uses in these locations will not be supported, though acknowledges that offices or other non-industrial uses will be supported where they are ancillary to the use of the site.</p> <p>Whilst our Client is supportive of the intensification of sites within the LSIA, the Site has remained severely underutilised for the last three years, with the existing industrial uses on the Site remaining commercially unattractive, in its current form, for potential investors. The draft Regulation 19 Local Plan as currently worded remains too restrictive, and does not recognise the opportunity to deliver residential and other uses on appropriate sites within LSIA's, to unlock the development values needed to allow for the provision of high-quality modern industrial floorspace.</p> <p>The new London Plan was published in March 2021. Policy E7 (Industrial intensification, co-location and substitution) states that Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land.</p> <p>Part B of the policy states that:</p> <p><i>"Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process."</i> (emphasis added)</p> <p>We are therefore of the view that the draft 'Publication' Local Plan fails to give sufficient consideration to the potential of co-locating industrial uses with residential within the Lydden Road LSIA, not only to kick-start investment to attract occupiers such as start-up businesses but to also alleviate the pressure for additional housing and office provision in the Borough.</p>

	On this basis, the draft Plan should seek to identify the site for development with a range of potential uses being including both offices and residential uses, to allow for sufficient flexibility to optimise the site, in line with the national planning policy framework.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comments noted. The Council is cognisant that similar representations were made as part of the consultation on the Pre-Publication (Regulation 18) version of the Local Plan, which were considered as part of drafting of the revised Publication (Regulation 19) Local Plan. Then, as now, it was not considered appropriate to amend the approach to LSIA's within the Local Plan for the following reasons.</p> <p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>As part of the ELPS study, stakeholders from the Lydden Road area were invited to participate in a workshop and to submit information to assist with the study. That information was carefully considered at the time of the study, and is accounted for within its conclusions. The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan, and it is noted that there are, therefore, not considered to be "other locations within the Borough which... would be better suited" for industrial land, as suggested in the representation on the Pre-Publication Local Plan. Policy LP 34 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Waste Management), Part F specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the provision of additional housing and office development. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters

Agent Organisation Details	Graduate Planner Savills
Comment ID	321
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy SDS1 – Spatial Development Strategy 2023-2038</i></p> <p>The draft policy proposes a housing target of 1,950 new homes annually until 2028/29, which aligns with LBW's housing target identified in the London Plan. However, the Council's own Local Housing Need Assessment (2020), published as part of the local plan evidence base, outlines the LBW Objectively Assessed Need ('OAN') is 2,537 dwellings per annum.¹</p> <p>Whilst aligning the housing target in the draft plan with the London Plan ensures its general conformity, it also fails to consider Robert Jenrick's (the then Secretary of State for the Ministry of Housing, Communities and Local Government) letter to the Mayor requiring the now adopted London Plan's housing targets be immediately reviewed following its adoption.² As such, given that LBW has objectively identified itself a greater need for housing the plan would fail to deliver against this basic requirement. We suggest that a positively prepared plan would meet its own identified needs rather than adopting an out-of-date position informed by an out-of-date evidence base from the London Plan.</p> <p>Therefore, this discrepancy between the evidence base housing target and the housing target identified in draft policy means this policy was not positively prepared, would not be effective in delivering the needs of the borough and is therefore not justified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The Objectively Assessed Need figure is an unconstrained figure based on the Standard Methodology i.e. it does not take account of land supply, availability of developable land, other constraints such as designated parks and open spaces and the character of an area.</p> <p>Therefore, on the supply side, the GLA/Mayor of London has carried out a London-wide "Strategic Housing Land Availability Assessment" (SHLAA) as well as a London-wide Strategic Housing Market Assessment (SHMA). The SHMA identifies the (unconstrained) need for additional homes per annum (i.e. 66,000 across the capital). The purpose of the SHLAA on the other hand is to identify supply to meet future housing need, as well as being consistent with the policies set out in the overall NPPF. The SHLAA methodology takes account of the distinct circumstances in each of the boroughs, including the limited stock of land and the uniquely pressurised land market as well as dependence on recycling brownfield land currently in existing uses. The SHLAA methodology has been developed and refined over time, and Wandsworth Council officers have worked very closely in partnership with the GLA to assess potential sites and constraints. The London Plan has a 10-year target of 19,500 or 1,950 dwellings per annum for Wandsworth. For this reason, an authority's housing target is not the same as the</p>

	<p>objectively assessed need because the need figure doesn't take into account the area's deliverable and sustainable supply capacity, defined with reference to constraints set out in the NPPF.</p> <p>The housing requirement figure of 20,311 is based on the London Plan requirement for Wandsworth to 2028/2029 and a combination of the small sites target and SHLAA sites, which reflects the Plan's suggested approach to meeting housing need beyond 2029.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	322
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy PM9 – Wandsworth's Riverside</i></p> <p>PBL support the broad aims of this draft policy with regards to respecting views and vistas as identified in the Urban Design Study (2021) (Point 5); enhancing the public realm (Point 6); taking account of ecological value (Point 7); and having regard to the All London Green Grid (ALGG) (Point 8).</p> <p>With regards to inclusive growth, we consider that the housing delivery targets for the borough should be increased (as discussed against draft policy SDS1 above) which would likely result in an increase for delivery in the Wandsworth Riverside area. However, the aims to promote residential-led development in the Focal Points of Activity, alongside a mixture of uses to increase activity and vibrancy along the riverside is one we support.</p> <p>The 'People First' element of the policy is also supported. PBL recognise the importance of delivering a continuous, connected and legible Thames Path route along the river; increasing public access to the riverside; as well as enriching these spaces in terms of heritage and public art. 1 Battersea Bridge Road is capable of delivering a number of these objectives of the draft plan where the right policy conditions allow for the site to be delivered and optimised for its re-development potential.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Promontoria Battersea Limited

Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	323
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP1 – The Design Led Approach</i></p> <p>Draft policy LP1 requires development proposals to, among other things, use a design-led approach to optimise the potential of sites, in conformity with the approach set out in Policy D3 of the London Plan (2021).</p> <p>Whilst PBL is fully supportive of the LBW's intention to optimise site's utilising the design-led approach as set out, we consider this approach to be at odds with draft Policy LP4 (Tall and Mid-rise Buildings). The detail of draft Policy LP4 is discussed in detail below.</p> <p>However, a design led approach as set out in the draft 12 criteria of Policy LP1 allows for flexibility and for an applicant and the Borough to engage in discussion and debate through the relevant Development Management procedures. This approach ensures that any development proposals submitted to the Borough would need to respond to this policy whilst demonstrating that the Site has been optimised to deliver best outcomes for the borough. A rigid approach which caps heights removes this design approach from the process and is unlikely to therefore deliver the jobs and homes the borough needs as well as resulting in inferior design proposals.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the</p>

	<p>'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Policy LP4 defines tall buildings and tall building zones, and is based on a rigorous assessment of Wandsworth's built form and varying characteristics. It concludes with firm recommendations for the development of the skyline based on this assessment. PolicyLP1 takes an approach that seeks to respond to, and balance, development needs and site context / characteristics. Height parameters are considered to form one part of the consideration of the design-led approach.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	324
Title	LP3 Historic Environment
Number	Policy 14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP3 – Historic Environment</i></p> <p>Part 3 of this draft policy requires development proposals to positively contribute to and, whenever possible, enhance the setting and integrity of strategic and local views (as set out in the London Plan and in table 14.1) and valued. The starting point for this draft policy is to positively contribute, which appears to go over and above the position in the London Plan and the NPPF.3 The extract from London Plan policies HC1 and HC4 demonstrate that the baseline is to conserve and to not harm, as opposed to requiring a positive contribution. Whilst we are generally supportive of protecting Wandsworth's historic and strategic environments, draft policy LP3 (Part 3) appears more onerous than the London Plan and the NPPF. This policy as drafted is therefore not in general conformity with the London Plan and not consistent with national policy.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The approach is considered to be sound. Paragraph 190 of the NPPF identifies that local plans set out a positive strategy for conservation of the historic environment and that this strategy should take account of the desirability of new development making a positive contribution to local distinctiveness etc.

Proposed Change	No changes considered necessary.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	325
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP4 – Tall and Mid-rise Buildings</i></p> <p>This draft policy establishes tall and mid-rise building zones across the borough; with 'tall' buildings defined as 7-storeys or 21m (whichever is the lower) and 'mid-rise' (for 1 Battersea Bridge Road) defined as 6-storeys or 18m (whichever is the lower). We consider this rigid approach to tall buildings to be inflexible and an inappropriate strategy for the borough to be able to encourage and deliver appropriately optimised sites. Optimising sustainable brownfield sites such as 1 Battersea Bridge Road is a strategy that is reiterated in both Policy D3 (Optimising Site Capacity Through The Design-Led Approach) of the London Plan and the National Planning Policy Framework.⁴ By restricting the appropriate optimisation it is our view that the policy as drafted is too rigid and discourages development at 1 Battersea Bridge, thereby making the policy not deliverable and not effective.</p> <p>The 1 Battersea Bridge Road site was included within an opportunity area for tall buildings and/or landmark buildings in Regulation.18 Draft Local Plan, which was underpinned by the Arup Urban Design Study (2020). However, there is no justification for the borough's approach in removing the Site from the tall building zone and placing it into the mid-rise building zone. It is important to note that it is only 1 Battersea Bridge Road that has been removed from the tall building zone, none on the neighbouring plots have.</p> <p>Appendix A of the Urban Design Study (2021) provides high level townscape, visual and heritage assessment for various tall building zones. This includes detailed massing models for many of the tall building areas, to assist in justifying an area's respective designation. However, it is noted that the mid-rise building zone the Site is located within (i.e., MB-B2-02) has no such assessment and it is therefore unclear what evidence the Urban Design Study (2021) has utilised to justify why it is just 1 Battersea Bridge Road that has been moved to a mid-rise zone whilst all neighbouring plots remain in a tall building zone.⁵</p> <p>The sudden but significant move away from the tall building zone to the mid-rise building zone is made even more confusing in the context of the November 2018 pre-application meeting with LBW officers. In this instance a residential-led proposal comprising approximately 26-storeys was supported in principle by officers. Officers noted that a tall building next to Battersea Bridge, "a gateway to the Borough" would "act as a landmark and reference point". Officers also noted the principle support was subject to the normal townscape and design considerations, as is detailed within a formal planning submission.</p>

Further to the above, the Urban Design Study (2021) makes no reference to neither London-wide nor Wandsworth-specific examples of tall and/or landmark buildings that already mark London's numerous bridges. Lombard Wharf frames the Battersea Railway Bridge in Wandsworth, One Blackfriars frames Blackfriars Bridge, and Nine Elms developments frame Vauxhall Bridge in Lambeth. There is clear precedent for tall buildings marking various bridgeheads across London, all of which were tested in townscape terms and in the absence of any townscape assessment of a tall building at the Site it is our view that Policy LP4 is **not justified**.

Page 11 of the Urban Design Study (2021) states that Wandsworth has capacity for tall buildings in a number of strategic and local locations, one of which is along the River Thames Frontage, as illustrated in the image below.⁶ It is perplexing that the 1 Battersea Bridge Road site is the only site within this area of the Thames Frontage that is not within a designated tall building zone, particularly where no justification for this has been given.

Draft Policy LP4 (Part C) states proposals for tall buildings will not be permitted outside the identified tall building zones. The apparent blanket-ban on tall buildings outside of tall buildings zones does not align with the recent *Master Brewer (2021)* judgment of the High Court. In summary, the court held that a tall building proposal should be assessed against the potential impacts outlined in Policy D9 (Part C) of the London Plan (2021) rather than assessing the impacts in a vacuum.⁷ Whilst London Plan Policy D9 allows local planning authorities to be more prescriptive with tall building locations it is clear from the Master Brewery judgment that an assessment of a scheme holistically should be considered. As currently drafted, Policy LP4 (Part C) strictly prohibits tall buildings outside of tall building zones and removes an applicant's ability to appropriately provide a planning justification for a scheme. It is therefore our view that Policy LP4 (Part C) is **not in general conformity with the London Plan, nor is it effective**.

LP4 (Part 3) states proposals should be designed to reflect and respond to relevant key view corridors toward the Site to ensure location, form, detailing and prominence of tall buildings are appropriate within the wider context. We are generally supportive of this insofar as it seems to support the iterative design process and encourages applicants to engage in the design-led process. However, LP4 (Part 4) states the design of the lower, middle and upper parts of tall buildings should result in the creation of a visually coherent scheme both in terms of the building itself and how it relates to the surrounding area, and its appearance in any mid- or long- range views.

The Site presents a clear opportunity at the bridgehead of Battersea Bridge to deliver a legible and visually coherent scheme which acts as a distinct marker of entry into the London Borough of Wandsworth.⁸ In this context, we consider the Site capable of accommodating a building taller than "mid-rise" in this location. This is echoed in the submitted Townscape Narrative which states that *"a tall, and potentially landmark building, is entirely appropriate for 1 Battersea Bridge Road. Furthermore, in townscape terms, we firmly believe that a tall building would be more appropriate here than a mid-rise building."*⁹

LP4 (Part 16) states tall building proposals should incorporate active frontages at ground floor. We are supportive of LBW's approach to active ground floor uses. This is particularly beneficial for sites such as 1 Battersea Bridge Road where such uses can help animate the building's landward-orientation and its river orientation along the Thames Path.

Much of the tall building "impacts" to be assessed under Policy LP4 concern design. In this design context, development proposals should be tested through the development management process following submission of a detailed planning application. It is our view that the 1 Battersea Bridge Road site is capable of satisfactorily meeting the criteria established in Policy LP4. As noted in the submitted Townscape Narrative, subject to the appropriate townscape and design testing we contend the 1 Battersea Bridge Road site is capable of accommodating a building taller than the heights identified as "tall" in the neighbouring tall building zone (7- storeys or 21m, whichever is less).¹⁰ Where this is the case, a "step up" from the adjacent tall building zone would help create the landmark or gateway building demarcating entry to the borough, as discussed above.

In light of the above, it is our view that the 1 Battersea Bridge Road site has been wrongly included within a mid-rise building zone. The Urban Design Study (2021) presents no clear, townscape or design evidence of the Site in which to justify the mid-rise designation.

This is particularly pertinent considering the Site was included within an opportunity area for tall buildings and/or landmark buildings in the Reg.18 Local Plan and the fact that the neighbouring sites have remained within tall building zones and only 1 Battersea Bridge Road has been removed from the tall buildings zone.

For the reasons set out above, we consider this policy as drafted is **not justified**. The strict interpretation of the London Plan's tall building policy D9 is likely to discourage development and unduly restrict LBW's ability to deliver the wider objectives of Policy LP4. The policy as drafted is also therefore **not effective**.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA).</p> <p>Following the publication of the London Plan (post Reg 18 consultation), the Regulation 18 consultation comments and the advice of the GLA and Historic England, the council produced an updated UDS which allowed for the consideration of setting maximum heights for locations acceptable for Tall Buildings. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>The Council considers that the Master Brewer judicial review Case should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	326
Title	LP6 Basements and Subterranean Developments
Number	Policy 17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP6 – Basements and Subterranean Developments</i></p> <p>Part A.1 of this draft policy states that new or extensions to basements will only be permitted where it would result in no more than one storey of basement accommodation below ground level. However, there does not appear to be any evidence base to justify this position in the Reg.19 Plan. The acceptability of basement development should be determined on a case-by-case basis and LBW should be supportive of such development where an applicant has demonstrated a basement has been appropriately designed with appropriate mitigation measures, where necessary. This draft policy therefore appears unduly restrictive, particularly in the context that there is no evidence to underpin this position. As such, we consider the policy is not justified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The adopted Housing SPD provides reasoning for the limitation on multi-level basements.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters

Agent Organisation Details	Graduate Planner Savills
Comment ID	327
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP23 – Affordable Housing</i></p> <p>This draft policy seeks to maximise the delivery of affordable housing in line with the threshold approach set out in Policy H5 of the London Plan (2021). The policy also proposes an affordable tenure split of 50% low-cost rented housing, 25% first homes and 25% other intermediate products. A minimum discount of 30% will be applied to First Homes.</p> <p>PBL is supportive of affordable housing delivery. Nevertheless, where a site or development is not capable of coming forward in line with the threshold approach set out in Policy H5 (Threshold Approach to Applications) of the London Plan, or where the policy compliant tenure split is not deliverable, a viability case should be capable of being advanced with the Council. As drafted, Policy LP23 (Part E), states that viability information will only be accepted in exceptional circumstances. Clarity is sought from the Council in this regard as the use of 'exceptional circumstances' results in confusion with the drafting. Notwithstanding, the exceptional circumstances policy is more onerous than Policy H5, which allows applicants to make a case for a proposal in viability terms where the Fast Track Route requirement is not satisfied. This inflexible approach to viability testing schemes may limit the delivery of housing and affordable housing and render this policy objective undeliverable. This approach is therefore not in general conformity with the London Plan and is not effective.</p> <p>Having particular regard to the delivery of First Homes as part of the tenure mix, PBL has concerns whether a site such as 1 Battersea Bridge Road would be capable of delivering such homes. Paragraph 1.32 of the Local Housing Needs Assessment (First Homes) document states that where a greater than 30% discount is sought, consideration should be given to whether this prejudices the scheme viability of providing other affordable tenures such as social rented homes. Policy LP23 is clear that low-cost rented housing (such as social rent) is the borough's priority. As such, we consider that the tenure element of the policy could allow for greater flexibility and negotiation with Officers through the normal planning application procedures.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The wording refers to Criterion F of Policy H5, which sets out the circumstances under which viability information will be required. This is effectively 'exceptional' to meeting the threshold approach.</p>

	<p>The policy clearly sets out the Council's requirement for a provision of 50% low cost rented housing in accordance with the London Plan ambition, and its tenure split, set out at policies H4 and H6. Evidence suggests that this is a realistic target. Changes are made to the policy to seek a balance of intermediate products based on the low-cost rent element achieved.</p> <p>First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Changes are made to the supporting text to Policy LP23 to explain this. Uncertainty exists as to the deliverability and viability of First Homes throughout the borough, and no First Homes have been secured in the borough to date. Given this uncertainty, it is agreed that a requirement for First Homes should be removed from the policy, and instead rely upon the reference to First Homes in national policy.</p> <p>It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. So therefore, it is considered that flexibility should be introduced into the wording to seek a balance of intermediate products - which should include First Homes - after the agreement of the low cost rented element, which would reflect those differing circumstances on sites across the borough.</p> <p>As stated at para 17.12, the Council's priority is genuinely affordable housing in accord with the London Plan and the Local Housing Needs Assessment. It also states that other intermediate products will be considered provided it can be demonstrated that local housing need will be met.</p> <p>Further, the plan should be read as a whole. Criterion (e) of LP24 ensures that the policy is applied on a site by site basis and considers context, need and viability.</p> <p>Introduction of 'at least' prior to the provision of 50% low cost housing stems from representations made elsewhere.</p>
Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the <i>The</i> updated Planning Practice Guidance, <i>requires</i> 25% of all homes required <i>delivered</i> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <i>should be</i> discounted by at least 30% against the market value, <i>acknowledging the variance of market conditions across the borough</i>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	328
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP33 – Promoting and Protecting Offices</i></p> <p>This draft policy establishes the borough's approach to office development by focussing employment development to key strategic areas such as the Central Activities Zone ('CAZ'), town centres and economic use intensification areas for example.</p> <p>We support the borough directing office development to areas such as the CAZ (LBW's CAZ area is the Vauxhall, Nine Elms and Battersea Opportunity Area ('VNEB')) to cater for predominately large-scale office floorplates. The LBW Employment Land and Premises Study ('ELPS', 2020) indicates there is a net additional requirement for 22,500 sqm of office floorspace over the emerging plan period. We support the flexible approach of this policy in delivering new office floorspace to achieve this identified target.</p> <p>Draft Policy LP33 (Part E) protects existing office floorspace in locations such as the CAZ and town centres, among others, and only supports redevelopment in those areas where they result in no net loss of office or upon a successful 18 month marketing period. The draft policy does not appear to apply strict protections to existing office floorspace outside of the abovementioned areas. We are supportive of this policy and consider it affords the appropriate flexibility in delivering an appropriate amount of office space in the borough.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. It is noted that, where there are existing clusters of successful office developments in Focal Points of Activity, the borough also seeks that development scheme 'maximise the re-provision of existing office floorspace, with redeveloped floorspace suitable SMEs, co-working, or providing open workspace'. This is set out in Policies LP35 (Mixed Use Development on Economic Land) and LP59.F (Riverside Uses, including River-dependent, River-related and adjacent Uses). As the representation identifies, this is considered to afford sufficient flexibility in delivering the appropriate amount of office floorspace in the borough.
Proposed Change	No changes required.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	329
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p data-bbox="383 256 1921 280">London Borough of Wandsworth Draft Regulation 19 Local Plan Public Consultation – comments submitted on behalf of Promontoria Battersea Limited.</p> <p data-bbox="383 325 510 349">Introduction</p> <p data-bbox="383 427 2085 480">This written representation is submitted by Savills (UK) Limited (hereafter known as ‘Savills’) in response to the London Borough of Wandsworth Council’s (‘LBW’) invitation to submit comments in respect of a public consultation on the Regulation 19 draft of the new Local Plan. These comments are submitted on behalf of Promontoria Battersea Ltd (‘PBL’).</p> <p data-bbox="383 523 2123 651">PBL exchanged contracts to purchase 1 Battersea Bridge Road (‘the Site’) in 2021, an unallocated site within the Ransomes Dock Area of Focal Activity, with the aim of bringing it forward for re-development. 1 Battersea Bridge Road is a highly sustainable brownfield site in a well-connected location which presents an excellent opportunity to help homes so desperately needed both in the borough of Wandsworth and the wider London area. It is the intention of PBL to work with the London Borough of Wandsworth both through the planning application and the local plan process to ensure the Site is optimised. The observations set out in this representation are made in the context of seeking to deliver the re-development of this Site in the short term and we look forward to working with the borough to achieve this.</p> <p data-bbox="383 694 1249 718">In addition to the observations set out, this representation is accompanied with the following:</p> <ul data-bbox="383 798 1429 874" style="list-style-type: none"> • Urban Design & Townscape Analysis – prepared by Professor Robert Tavernor (Appendix 1); • Indicative Development Options Designed – prepared by Simpson Haugh and Partners (Appendix 2); and • Financial Viability Appraisals for Indicative Development Options – prepared by DS2 (Appendix 3). <p data-bbox="383 917 589 941"><u>Executive Summary</u></p> <p data-bbox="383 984 2107 1037">The Reg.19 Plan seeks to shape growth and change in Wandsworth over the next 15 years as the borough seeks to meet a pressing need for new housing and recover from the effects of the global pandemic. The main representation below presents the following arguments:</p> <ul data-bbox="383 1080 2123 1265" style="list-style-type: none"> • The Site has been wrongly included within a “mid-rise” building zone. • Including the Site within a mid-rise zone is a significant and unexpected departure from the Regulation. 18 draft local plan. There is no evidence to support the change in the Regulation 19 draft local plan. • To restrict the development potential of the Site in this way makes future proposals unviable. It therefore stymie’s the development of this important site located in a riverfront location on a bridgehead. Sterilising development of the Site in this manner would represent a lost opportunity for LBW to deliver a landmark building, acting as a gateway site for the borough. • It is our view that the Regulation. 19 draft local plan is not ‘sound’ as it is neither effective nor justified. We detail below the changes we consider to be made for the draft local plan to be considered ‘sound’. <p data-bbox="383 1321 622 1345"><u>National Policy Context</u></p> <p data-bbox="383 1388 1420 1441">Paragraph 35 of the National Planning Policy Framework (‘NPPF’, July 2021) states that for an emerging Local Plan to be found “sound”, it must satisfy the below four criteria:</p>

- 1 **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;
- 1 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 1 **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
- 1 **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

Further to the four tests above, local plans in London are also required to be in “general conformity” with the London Plan.

Background

Pre-Application Advice

Prior to the sale of the Site to PBL, the previous owners undertook pre-application discussions with the London Borough of Wandsworth. The Council’s pre-application planning advice noted that a mixed-use development for offices and residential accommodation in a building of scale was broadly supported, subject to the normal townscape, environmental and infrastructure justification you would expect through the normal planning application procedure.

We would contend that there are no material townscape or environmental conditions which would fundamentally result in a change in approach to this site in terms of the delivery of a tall building.

Regulation 18 Draft Local Plan

The LBW undertook its Regulation 18 consultation of the draft plan (Reg.18 Plan) in early 2021. Within the Reg.18 plan the Site was located within the Ransomes Dock Focal Point of Activity and an opportunity area for

tall building clusters and/or landmark buildings, as illustrated in the image below. For clarity, the key in the image outlines the following:

- Burgundy – Opportunities for tall building clusters and/or landmarks
- Deep orange – Opportunities for tall buildings within town centres and along strategic routes
- Pale orange – Opportunities for tall buildings within a local context

	Since the publication of the Reg.18 Plan we do not consider there to have been any change on or near the Site which would materially change site conditions in environmental or townscape regard. Further, we note that the neither the draft Reg 19 plan or its supporting evidence base points to any change in circumstances.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No changes considered necessary.

Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	330
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP38 – Affordable Workspace</i></p> <p>This draft policy requires proposals delivering over 1,000sqm of economic floorspace (such as offices) to provide at least 10% of the gross economic floorspace as affordable workspace. Whilst we support the affordable workspace policy in principle, due to its current inflexibility it is not effective and cannot be considered to be “sound”. The policy as currently drafted requires applicants to deliver 10% of gross proposed economic floorspace even in an area which may see little SME demand, thereby making the space unlettable. This inflexibility can be corrected through applying the 10% threshold to the proposed net additional economic floorspace.</p> <p>A similar issue was raised by Inspector Mike Fox in his Inspector’s Report to the Lambeth Main Modifications, whereby he noted ‘...the requirement of the policy to deliver 10 per cent of total floorspace, as drafted, for affordable workspace, provides very little flexibility in areas where SMEs have been declining due in part to high land costs.’¹¹ Inspector Fox continued that by applying the threshold to the gross floor area, Lambeth’s policy as drafted overlooks the back of house/circulation areas, which are not linked to specific users. As such, an affordable workspace applied to the net additional floorspace would result in a more ‘efficient and equitable way of calculating such provision.’</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Employment Land and Premises Study has assessed requirements for affordable workspace across the borough, which recognises that the extent to which workspace is deemed ‘affordable’ varies considerably based on the type of business which the workspace is provided to accommodate - and a tailored approach is applied between the VNEB OA and the rest of the borough (accounting for different office markets). Proposals for over 1000 sqm of economic floorspace, however, are very likely to either be located in areas in which there is an existing economic cluster, in town centres, or in the VNEB OA - all of which have identified demand for types of affordable workspace provision. The policy, combined with the sequential preferential location approach set out in LP33, is unlikely to therefore result in proposals for over 1000 sqm of economic floorspace coming forward where there is not the associated SME

	demand. The amendments as suggested would lessen the current policy requirements and result in less affordable provision coming forward, which is considered contrary to both the needs of the borough and the strategic ambitions on the Local Plan.
Proposed Change	No change considered necessary.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	331
Title	LP51 Parking, Servicing and Car Free Development
Number	Policy 62
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP51 – Parking, Servicing and Car Free Development</i></p> <p>Draft policy LP51 (Part D) requires car-free development where a given site has a PTAL 4 rating, a Transport Assessment demonstrates that private car parking is not required, with the appropriate number of disability friendly spaces are provided in accordance with the London Plan. We are generally supportive of LBW's ambition to reduce car parking across the borough but consider the car parking strategy to be determined through the development management process informed by a Transport Assessment and/or other appropriate documents. The PTAL measure does not account for walking or cycling routes and/or shared cycling initiatives such as Santander Cycles, of which there are approximately five different docking stations nearby the 1 Battersea Bridge Road site.</p> <p>Further, there does not appear to be any evidence base documents to underpin the position that PTAL 4 is the default car-free position. The policy as currently drafted appears unnecessarily rigid and may contradict applicant efforts to encourage the use of more sustainable transport modes. This draft policy is therefore not justified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	London Plan Policy T6 Car Parking and it's associated parking policies outline the requirement for parking to be car-free in areas with a PTAL of 4 or higher. This Policy is in accordance with this position.

Proposed Change	No change considered necessary.
Consultee Full Name	Promontoria Battersea Limited
Consultee Organisation Details	
Agent Full Name	Jodane Walters
Agent Organisation Details	Graduate Planner Savills
Comment ID	332
Title	LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses
Number	Policy 70
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses</i></p> <p>Parts F and G of this draft policy state:</p> <ol style="list-style-type: none"> 1 Along the riverside within the Thames Policy Area, mixed-use development will be supported where it would create safe high-quality environments, provide new homes, leisure, social and cultural infrastructure facilities, provide public spaces, incorporate riverside walks and cycle ways and increased public access to the river. 1 G. Within Focal Points of Activity uses including restaurants, cafes, bars, cultural space and small-scale retail will be permitted in order to create vibrant and active places, subject to compliance with Policy LP43 (Out of Centre Development). High-quality and well-designed public spaces with good access should be provided to form new destinations which are designed to make full use of the amenities offered by the riverside. Successful clusters of existing economic floorspace should be re-provided, where possible, in accordance with Policy LP35 (Mixed Use Development on Economic Land). The Focal Points of Activity are located at: <ol style="list-style-type: none"> 1 Wandsworth Riverside Quarter and Wandle Delta 2 Lombard Road/York Road Riverside 3 Ransomes Dock <p>We are supportive of this draft policy and the Borough's wider ambition to enhance its riverside spaces such as the River Walk, deliver new homes and other appropriate uses for end-users of the LBW's Thames Policy Area and Focal Points of Activity such as the Ransomes Dock Focal Point. The 1 Battersea Bridge Road site is located at the 'junction' of Battersea Bridge</p>

	and the Thames Walk to the east which leads to Battersea Park and further to Battersea Power Station. An appropriate mixed-use development at the Site would allow these positive riverside uses to be delivered as sought in the draft policy.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changes required.
Consultee Full Name	Mr Mark Broxup
Consultee Organisation Details	General Manager Western Riverside Waste Authority
Agent Full Name	ms niamh burke
Agent Organisation Details	Carter Jonas
Comment ID	333
Title	LP13 Circular Economy, Recycling and Waste Management
Number	Policy 24
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy LP13 Waste Capacity - The WRWA supports policy LP13 which seeks to safeguard existing waste sites and identify new sites in the borough which contribute to London's recycling and waste capacity, in particular the potential given to the consolidation of waste sites. Part F of the draft policy highlights the Council's intention to increase waste capacity within the borough, although it is acknowledged that no sites were put forward to meet the identified need (Consultation Statement Appendix 5). The WRWA has two points to make on this. First, it is not clear that the supporting evidence base has given sufficient consideration to the requirements of the Environment Act 2021, with the inevitable consequence that the quantitative and qualitative shortfall in current facilities to meet the identified need is under-estimated, let alone the ability of these facilities to meet future needs. Second, there are clear opportunities to improve and enhance existing facilities within the borough that can help meet this need, however this is going to require changes to draft allocations WT9, NE9 and NE11, and the

	Council will have to play a lead role in facilitating the delivery of the facilities through the plan-making and decision-making process on applications. The WRWA's comments on the draft allocations is set out under separate headings in this submission
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The WRWA owns two waste transfer stations in the Borough, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan and also within the draft Plan. The WRWA do not find the policies in the draft Plan relating to the two sites to be sound and therefore consider it necessary, as significant landowners in the Borough, to participate in the hearing sessions at the Examination in Public. We ask to be notified about future hearing sessions in due course.
Council Response	Comment noted. Given the future implications of the Environment Act it is recommended that wording is added to para 4.89 to say that the Council will work with the WRWA to consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plans for the WRWA. This supplements the agreed response regarding including the HWRC site within the Site Allocation boundary of WT 11 (See Rep 361) which is considered to assist with any future improvements or enhancements to existing facilities.
Proposed Change	Amend wording to para 4.89 bullet point 3 as follows: '4.89 Uses - ... There are appropriate temporary uses for the short to medium term including potential use of the southern part of the site for waste management purposes that do not compromise the long-term development of the site. <u>Due to the new requirements for waste management set out in the Environment Act 2021, the Council will work with the WRWA and consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plan for the WRWA.</u> Temporary use of the site should also include the safeguarding of, and extension to, the riverside walk adjoining the Thames and the River Wandle.'

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	334
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Response to Regulation 19 Publication Version of Wandsworth Local Plan From: The Battersea Society Planning Committee</p> <p><i>Introduction</i></p> <p>The Battersea Society submitted detailed comments on the Regulation 18 draft Local Plan dated November 2020 and issued for consultation in January 2021. We are disappointed that few of our comments were accepted, and that the substance of the Plan remains largely unchanged. We believe that many features of the Plan fail to meet one or more of the four criteria of soundness set out in the latest revision of the National Planning Policy Framework (NPPF).</p> <p>In our response below we have had to reiterate many of the concerns we expressed a year ago. We recognise that as the Plan was being prepared, significant changes and uncertainties were introduced into the policy environment, following the White Paper <i>Planning for the Future</i>, revisions to the NPPF, publication of the National Design Guide (NDG) and the National Model Design Code (NMDC), and publication of the London Plan. Additional there were the difficulties of the pandemic.</p> <p>Notwithstanding this problematic context, it should have been possible to produce a Plan with overall integrity- something this document lacks. It reads as three separate parts – Strategic Context; Spatial Strategy and Area Strategies. Too often policies are poorly related and appear as discrete topics - for example urban design, housing, transport, green and blue infrastructure and so forth. The Plan therefore fails to fully meet the test of soundness. Nor does it meet the NPPF requirement that it should contain policies that are clearly written and unambiguous, demonstrate how they address relevant economic, social and environmental objectives, and avoid unnecessary duplication.</p> <p>The Plan is over-long, inconsistent and incoherent, and does not represent a proper basis on which to determine policies and strategies for the next fifteen years.</p> <p>Its excessive length is the result</p> <ul style="list-style-type: none"> • of needless repetition (for example, paragraphs 20.13-20.16 on the Healthy Streets approach, or 21.13 and 21.25 on Metropolitan Open Land); • long-winded and convoluted statements (such as the paragraphs on building heights at the end of each site allocation); • needless explanations of points not directly related to the Plan (such as paragraphs 16.6-16.7 on the links between the environment, health and well-being; 19.52 on meanwhile uses; or 20.11 and 20.14 on the benefits of walking and cycling); and • otiose and repeated rhetoric about Wandsworth's success such as its being as 'one of the most desirable and dynamic places to live and work in London' (paragraphs 2.17, 2.20 and 20.10). The examples given above could be multiplied across the Plan. <p>The Plan is inconsistent and incoherent because:</p> <ul style="list-style-type: none"> • There is no clear connection between the strategies, visions and objectives in Chapters 2 and 3 – themselves internally inconsistent - and the policies set out in the rest of the Plan. Many examples are given in section comments below.

	<ul style="list-style-type: none"> • There are inconsistencies in the inclusion or not of site allocations that featured in previous plans, and where planning permission has been granted, or building work is well underway, in some cases nearing completion. In a number of cases permission has been granted in conflict with the policies in this plan. • There remain many factual mistakes that were pointed out in responses to the previous draft. • There are too many references in the future tense to things that have already happened (for example, the opening of the Northern Line Extension, or the Embassy Quarter Heating Network). • The scattering of maps throughout the Plan, the lack of any list of them, and their form of presentation, means that there is no simple way to find out what is mapped, or where. Those maps that cover the whole borough are often oddly placed (it is odd, for example, that the first map (2.1) should be about public transport, while Chapter 20 lacks any map on that issue). • There are many references to the London Plan, but they are made inconsistently. In some cases policies in this Plan (LP1 and LP 19 for example) set London Plan policies as a specific requirement; in others (LP42, for example) London Plan policies are mentioned only in subsequent explanatory paragraphs; in others (LP23 for example), while London Plan policies are not referred to in the policy, they are explicitly modified in subsequent paragraphs; and in yet others (LP17 and LP31, for example), policies here are incompatible or inconsistent with the London Plan, though this is not acknowledged. These differences make it almost impossible for those using the Plan to judge precisely what policies are relevant to any particular kind of development. • The framing of the paragraphs that follow each of the Plan policies leads to incoherent justification for the policy. There is no consistent approach. While they mostly provide background or context for the policy in question, or point to relationships with other policies, in other cases they add to or modify that policy (for example 16.66 on Planning Obligations relating to water and drainage infrastructure; 17.12 on types of affordable housing; 18.67 on open space provision; or 20.30 on car club parking). This makes it problematic for the Plan's users to see precisely what the policy is. <p>We exemplify all these problems in our comments under the relevant sections, with a focus on the implications for Battersea.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	335
Title	Strategic Context, Vision and Objectives
Number	2
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 2. Strategic Context, Vision and Objectives</p> <p>As we pointed out in our comments on the previous draft, this chapter gives not one but seven different visions, numerous strategies and 13 overlapping but often inconsistent sets of objectives. How any of them relate to each other is wholly unclear since there are overlaps but also significant differences between them, as well as gaps. Hence it is almost impossible for the reader to make any sense of what the overall vision, or the core strategies, might be; or which among the competing sets of objectives are the ones to which reference might be made in the rest of the Plan. The status and purpose of the numerous and varying lists of strategies and objective are undermined when we find in Chapter 3 a completely different set of 14 principles against which we are told (3.26) that development proposals will be assessed. This chapter therefore fails to provide, as required under the test of soundness, “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”. This makes it impossible to judge, as the NPPF requires, whether the policies that follow in succeeding chapters – or which of them – fit the overall strategy.</p> <p>The problems are exacerbated by the huge amount of repetition: many topics are dealt with in several different places in the 109 paragraphs, with different - often inconsistent - objectives and targets. Housing, for example, is covered in paragraphs 2.2 to 2.9, 2.41 to 2.43, and 2.80 to 2.83, with many additional mentions, saying different but related things (though housing hardly features in the overall lists of key goals and objectives; we have to wait until near the end - in policy SDS1 - for a specific housing target). Moreover, there is virtually no explicit cross-referencing to these different strategies and objectives in the remaining chapters of this over-long Plan. Such cross-referencing might have avoided some of the inconsistencies that litter the Plan as a whole.</p> <p>Finally, we note that despite the several references throughout the Plan to the required ‘Policies Map’ illustrating geographically the application of policies that it contains - including, for example, archaeological priority areas (LP3); core, secondary and local frontages (LP42); areas of open space (LP53); and areas such as SSSIs (21.28) - no such map is provided in the Plan.</p> <p>We support the claims above by reference to the following paragraphs.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The spatial portrait and key aims provides the context within which the Local Plan has been developed in response to the main issues and needs of the borough.</p> <p>The Vision and Objectives and Spatial Strategy show how the Plan aims to respond to these issues. The spatial strategy sets out the main elements of how the Vision and objectives will be delivered.</p> <p>The housing section of the Plan aims to demonstrate the connections between itself and the various plans and strategies the Council (and its partners) has in order to fulfil its various roles and functions. It does not look to explain the relationships between each strategy. The policies of the Plan seek to make a balanced response to all strategies where they impact on land use.</p> <p>The Policies Map April 2022 version contains the related maps to where they are referenced in the Local Plan.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society

Agent Full Name	
Agent Organisation Details	
Comment ID	336
Title	Paragraph
Number	2.15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.15. The vacancy figures for the town centres given here are now grossly out-of-date following the pandemic.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The 10.9% figure was based on the 2018 Retail Survey Report, which was available when this was initially drafted and helped to inform the borough's Retail Needs Assessment. The paragraph itself recognises that the COVID-19 pandemic will likely cause vacancy rates to increase. It is agreed that the 10.9% figure should be dated, however the paragraph seeks to provide the context and baseline (including for the retail assessment), which may not be achieved if data taken during the pandemic is used (particularly where this was collected when the Government's counter-measures were in place). The paragraph should be updated for clarity.
Proposed Change	Amend paragraph 2.15 as follows: "The existing designated centres (including local centres) <i>had</i> have an average vacancy rate of around 10.9% <i>in 2018</i> , which <i>was</i> is just below the national average of 12.4%. However, these v vacancy rates are expected to <i>have</i> increased as a result of the impact of the COVID-19 pandemic, <i>to 13.2% in 2020 and 12.1% in 2021</i> , recognising that some shops and cafes may have closed permanently as a result. The vacancy rate is <i>typically</i> only slightly lower (9.7%) within the five town centres <i>than local centres</i> . The healthiest centres generally have a vacancy rate of around 5%, reflecting the fact that there will always be a number of vacancies as a result of the normal churn of occupiers."
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	337

Title	Paragraph
Number	2.26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.26. The discussion of vehicle ownership says nothing about traffic volumes, or about evidence of the increasing levels of congestion seen in the past two years, up by a third in Wandsworth.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is recognised that sustainable transport modes should be promoted over private car use and the transport policies support proposals that reduce the need to travel by car/vehicle.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	338
Title	
Number	Map 2.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Map 2.1 Public Transport Network.</i> The placing of this map here – the only map in a chapter that covers a host of issues – rather than in Chapter 20 on sustainable transport is difficult to understand. Moreover, it has no reference to the bus network, and fails even to indicate where PTAL levels and access to buses in particular are low (an issue mentioned in paragraph 2.24).
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Map 2.1 has been included here to complement the section on Transport as part of the context for the spatial strategy. The bus network is much more detailed and difficult to capture along with other public transit on a single map. PTAL is a regularly updated system and is available online.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	339

Title	Paragraph
Number	2.29
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.29. This paragraph states that the Plan contains the Strategic Vision and Objectives for Wandsworth. But there is no clear statement of the Vision, or how it relates to the six Corporate Plan objectives (2.31), the five Inclusive Growth objectives (2.34), and/or the Wandsworth Environment and Sustainability Strategy (2.38). Why do we have to wait until the lists of objectives on pages 22-24 for any reference (and even then implicit rather than explicit) to the three key aspects of sustainable development - economic, social and environmental - that is at the heart of the requirements set by the NPPF?
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	As stated within paragraph 2.56; 'the Council's Vision and Strategic Objectives for the new Local Plan have been developed within the context of the Council's long-term ambitions for the borough as a place.'. The Local Plan should be read as whole and therefore it is not considered necessary to cross refer to all objectives.
Proposed Change	No changes considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	340
Title	Paragraph
Number	2.33
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.33-34. Does what is referred to here as the Council's <i>Inclusive</i> Growth Programme, relate in fact to the <i>Smart</i> Growth recovery plan launched in June 2020? And how do the five objectives for the programme relate to the Corporate Plan objectives (2.31)? There are similarities, but also differences. Which are we to regard as authoritative?
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Yes the inclusive growth programme refers to the Smart Growth recovery Plan. This was developed under the Corporate Plan to be tailored to the Council's Covid-19 pandemic recovery.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	342
Title	Paragraph
Number	2.37
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.37-38. The vision for the Wandsworth Environment and Sustainability Strategy (WESS) says nothing about how to build a sustainable social and economic future for the borough. And the aim to be the greenest <i>Council</i> is beside the point; the Plan must be about the <i>borough</i> .
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	The WESS sets out actions the Council can take to help the Wandsworth community to be able to live within its environmental limits in an attractive, high-quality local environment and to be the greenest Council in inner London by 2030. It is considered that the Plan aligns with these actions.
Proposed Change	No changes considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	343
Title	Paragraph
Number	2.42
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.42. It is unclear how the Housing and Homelessness Strategy and its five themes relate to the strategies and objectives of the Corporate Plan (2.31), the Inclusive Growth Programme (2.34), the WESS (2.38), the various health, care, well-being and estates strategies and plans (2.47ff), or the Spatial Vision and Strategy (2.57, with 18 objectives in the text box on pages 20-21 and further sets of social and economic objectives on pages 23-24). It is similarly unclear how they relate to the subsequent statements about housing in this Chapter: in paragraphs 2.80-2.83, Section B of the Spatial Development Strategy on pages 33-34, the statements in 2.104 to 2.109; or to the strategies and ten policies set out Chapter 17 (pages 345-361).
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. This section of the Plan aims to demonstrate the connections between itself and the various plans and strategies the Council (and its partners) has in order to fulfil its various roles and functions. It does not look to explain the relationships between each strategy. The policies of the Plan seek to make a balanced response to all strategies where they impact on land use.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	344

Title	Paragraph
Number	2.47
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.47. The Joint Health and Well-Being Strategy seeks to reduce 'the differences in health and life expectancy between the wealthiest and most deprived people'. But this far-reaching objective receives no mention at all in the objectives for the Corporate Plan (2.31) or Smart Growth (2.34). Nor, even more disturbingly, is it mentioned in the social objectives on page 23, or in Chapter 16 on providing for Wandsworth's people.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	LP 15 paragraph 16.7 refers to the differences in health between wealthiest and most deprived people; 'A substantial part of the difference in health outcomes is down to a diverse range of social, economic and environmental factors that shape people's lives, which are often referred to as the 'wider determinants of health' or 'social determinants'. LP15 sets out criteria which will help residents to lead healthy and active lifestyles by including measures to reduce health and well-being inequalities.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	345
Title	Paragraph
Number	2.58
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>2.58. This paragraph is a disorganised mess: a mixture of aspirations and expressions of the need to address unrelated challenges, most simply repeated from elsewhere in the Chapter. Why the ones set out here are chosen for repetition, and not others, is wholly unclear. The statement in the middle of the paragraph that the Council will secure 'a greater choice in the type, size and tenure of housing, particularly for families' is incompatible with the targets for the mix of housing set out in policy LP24, which focuses overwhelmingly on 1 and 2-bedroom houses. But why is this statement separated by discussion of totally unrelated issues from the statement 8 lines further on about bridging the gap between housing supply and demand, and diversifying the housing offer? We note also that the references to housing demand are not accompanied by any reference to the separate issue of housing need, as discussed in the recent House of Lords report on Meeting Housing Demand[1].</p> <p>[1] HOUSE OF LORDS Built Environment Committee. 1st Report of Session 2021–22. HL Paper 132. <i>Meeting housing demand</i></p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Para 2.58 represents a summing up of the previous elements of the chapter in order to define the Plan's objectives, so some repetition is inevitable. The Local Plan is focused primarily on the role the Council plays as planning authority which may explain the choice of aspirations and objectives, as they are defined by the role of the Plan. Policies are based on evidence, including the Local Housing Needs Assessment, which shapes the approach to defining housing mix and other housing objectives.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	346
Title	Paragraph
Number	2.57
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	2.57. It is not clear whether the succinct vision presented here is intended to be the overall vision that is promised in paragraph 2.1; nor why we have to read through 56 paragraphs to get to it. How does it relate to the nine overlapping but inconsistent strategies and sets of objectives specified earlier in this chapter, or even to the objectives for 2038 and the environmental, social and economic objectives that follow?
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Council's Vision and Strategic Objectives for the new Local Plan have been developed within the context of the Council's long-term ambitions for the borough as a place. The vision set out in para 2.57 is set out after the background explanatory text.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	347
Title	Paragraph
Number	2.59
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Goals (?) for 2038</i></p> <p>It is not clear how this list of goals or targets relates to the numerous lists of objectives, priorities and targets set out in the preceding paragraphs; nor how it relates to the immediately-following list of environmental, social and economic objectives; nor how it relates to the spatial strategies in 2.59 and following paras. The status and purpose of these varying lists of strategies and objectives is made even less clear when we find in Chapter 3 a completely different set of 14 principles against which we are told (3.26) that development proposals will be assessed. Even within the lists of objectives shown here there are overlaps, but also significant gaps and differences, including, but not limited to the following.</p> <ol style="list-style-type: none"> 1 Despite the statements in 2.43 about housing and targets for affordable housing, and 2.58 about greater choice in housing, about bridging the gap between supply and demand, there is no specific target relating to housing in this list. For any such target we have to wait until the policies set out in SDS1. So in this crucial aspect, the two lists are incomplete. 2 Digital connectivity is mentioned in three of the targets in this list; but it does not feature in any of the social or economic objectives 3 There is no specific target in this list relating to arts and cultural provision; nor to transport services and infrastructure <p>Goal 1. It is wholly unclear how the three sentences in this target are related to each other, or to the other 17 targets. Is it a restatement of the vision set out in para 2.57?</p> <p>Goal 3. This objective on social integration should surely be related to the target of reducing inequalities through regeneration in goal 7.</p> <p>Goal 5. It is disappointing that this goal relating to Wandsworth town centre and the delta is not matched by a similar statement relating to Clapham Junction, especially since this revised version of the Plan commits belatedly to the development of a Master Plan for a core part of the Junction.</p> <p>Goal 6. It is impossible to see how anyone will know whether this extremely complex target has been met.</p> <p>Goal 10. None of what is said here about digital connectivity is reflected in the economic objectives set out in the immediately-following list.</p> <p>Goal 11. What is said here about the protection of industrial land does not take account of the Secretary of State's removal from the London Plan of the 'no-net-loss' of industrial land policy. But the objective should surely be related a) to Objective 4 and the creation of mixed-use quarters, particular those specifically mentioned in both targets; and b) to Objective 8 and the provision of employment opportunities.</p> <p>Goal 13. The statement that Wandsworth will be the best place to live in inner London by 2038 is meaningless unless there is a clear statement as to how that goal will be measured. And it seems very odd not to include the parks and commons among the public spaces and public realm that will be attractive and desirable.</p> <p>Goal 14. This objective is inappropriate without mention of the borough's 46 conservation areas among its heritage assets.</p> <p>Goal 16. The inclusion of the NLE in a list of targets for 2038 is inappropriate when it has already been opened.</p> <p>Goal 17. The claim that Wandsworth will be the greenest inner London borough is meaningless unless there is a clear statement as to how it will be measured. Neither in this Plan nor in the WESS is there any such statement.</p>

	<p>Goal 18. This goal is mainly about infrastructure, but with a final sentence that is entirely unrelated: "All our residents will enjoy a strong sense of community and inclusiveness". It is therefore incoherent.</p> <p><i>Social Objectives</i></p> <p>Objective 1. It is not clear how this housing objective relates to the five strategic themes set out as the basis for the housing strategy in 2.42; nor how it meets the NPPF requirement for strategies to ensure sufficient provision of housing, including affordable housing.</p> <p>Objective 4. We cannot understand the statement implying that placemaking and area strategies will facilitate linked trips (whatever that might mean); still less the implication that this will be the key outcome of those strategies.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The vision and objectives have been developed within the context of the preceding paragraphs regarding various strategies and plans. The 14 place-based principles were developed to establish what the Council considers are the characteristics of place that make cohesive, well-connected and healthy communities. They were used to inform the development of the Area Strategies. The principles and the resultant Area Strategies were developed within the Vision and Objectives of the Plan.</p> <p>In relation to the specific points raised:</p> <p>Housing is considered as a principle under 'Inclusive Growth': 'Provides sustainable housing (type, tenure and affordability) to meet local need.'</p> <p>Digital connectivity is stated under both the Vision table and the Environmental objectives.</p> <p>Arts and cultural initiatives would come forward as part of many of the goals including 4, 5, 7, 8, 13 and 18.</p> <p>The Area Strategy for Clapham Junction is considered under Goal 1.</p> <p>The reference to linked trips is related to placemaking and in effect, minimising the need for multi-trips for certain uses.</p> <p>Resident inclusivity is appropriately stated in goal 18 as it mainly is regarding resident related goals.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	348
Title	Paragraph

Number	2.59
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Spatial Strategy</i> 2.59-102. The spatial strategy outlined in these paragraphs is developed further in Chapter 3. But no attempt is made either here or in that Chapter to relate the themes in this strategy to the objectives for 2038 or to the environmental, social and economic objectives set out beforehand. Moreover, while twelve of the fourteen principles and themes which form the basis of the Placemaking and Area Strategies in Chapter 3 are discussed here, two – infrastructure and resilience; and nature, climate and biodiversity - are not; and others are differently titled. Again, there is lack of coherence and consistency as to the overall strategy.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The spatial portrait and key aims provides the context within which the Local Plan has been developed in response to the main issues and needs of the borough. The Vision and Objectives and Spatial Strategy show how the Plan aims to respond to these issues. The spatial strategy sets out the main elements of how the Vision and objectives will be delivered.
Proposed Change	No change is considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	349
Title	Paragraph
Number	2.71
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	2.71. The statement here that the “LIP includes targets for traffic reduction and supporting objectives under Outcome 3 of the MTS” makes it difficult to understand why none of them are mentioned in the preceding lists of goals and objectives.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The LIP and the Local Plan are to be read together and the LIP contains specific transport goals which would not be appropriate in the list of goals and objectives.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	350
Title	Paragraph
Number	2.73
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.73. The text fails to recognise that the Northern Line Extension has already been opened, and that Crossrail 2 has been put on long-term hold by the Government.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The text sets out that the Northern Line has opened. Other instances in the Local Plan where it was incorrectly stated that it had not come forward yet have been rectified. Crossrail 2 is still a major project that could influence a significant amount of development in the borough.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	351
Title	Paragraph
Number	2.76
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.76-77. This section on Design and Built Form fails to take account of – or even to reference - the NPPF's requirements for the development of design codes.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The council intends to produce an SPD which sets out the design codes for key areas of growth.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	352
Title	Paragraph
Number	2.82

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.82. The statement here about ensuring that "the dwelling stock supports the creation of settled and blended communities, and that the borough remains an attractive place for families" is incompatible with the overwhelming focus on the provision of studios, one-bedroom and two-bedroom units set out in Chapter 17.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Policies are based on evidence, including the Local Housing Needs Assessment, which shapes the approach to defining housing mix and other housing objectives. Policies within the plan also seek to protect family housing and protect and nurture the qualities of the borough that encourage people to stay within communities.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	353
Title	Paragraph
Number	2.84
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.84. The term 'responsive development' is not defined either here or elsewhere in the Plan, despite its being identified as a key theme or principle in Chapter 3. The statement here about the existence of masterplans and strategic significant developments does not apply to Clapham Junction.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The term Responsive development is not policy wording, it is sub heading wording and it is not considered necessary to put into a glossary as it is self explanatory.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	354
Title	Paragraph
Number	2.87
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.87. The implication in the final sentence, that redevelopment should wait until vacant units have been filled, is incompatible with the widely-evidenced need for development in several parts of the borough, notably Clapham Junction, with its designation as a nascent Opportunity Area in the London Plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The sentence intends only to suggest that larger-scale redevelopment (being more expensive) typically follows the reletting of readily available floorspace, however it is earlier recognised that some new investment opportunities cannot be accommodated in vacant units. It is not intended, however, to imply that the revitalisation will only occur with larger-scale redevelopment, and it is agreed that the sentence is superfluous.
Proposed Change	Amend the final sentence of paragraph 2.87 as follows: "In the longer term, as vacant units are filled, development will be aimed at revitalising the existing centres through redevelopment opportunities."

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	355
Title	Paragraph
Number	2.90
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>2.90. We are puzzled by the reference here to the Diamond Jubilee Bridge (the very name of which has been overtaken by events). Recent Council documents suggest that there is <i>Currently limited prospect of pedestrian bridge to link riverside with Imperial Wharf given current TfL finances and DfT's priorities.</i>^[1]</p> <p>[1] <i>Progress Report</i> presented to Strategic Planning and Transportation Overview and Scrutiny Committee. Paper 21-315, November 2021.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The active travel bridge between Battersea and Fulham is still being considered and may potentially come forward in the future.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	356
Title	Paragraph

Number	2.103
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.103. The heading Spatial Development Strategy adds to the confusion which riddles this Chapter. It is the second heading relating to Spatial Strategy (see the heading before 2.59). What is intended to be the relationship between the two sections is wholly unclear.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The wording Spatial Development Strategy signifies the title of the policy and is the Spatial Strategy.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	357
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>SDS1 Spatial Development Strategy 2023 – 2038</i> The purpose of this policy is wholly unclear. It is certainly not a comprehensive or coherent spatial development strategy. Its coverage is confined to housing and housing capacity, with some generic references to economic and employment issues and to waste management. It fails even to mention – still less to cover - many of the principles and themes outlined in

	<p>paragraphs 2.59-102 which form the basis of the Placemaking and Area Strategies set out in Chapter 3. Nor does it say anything about crucial issues such as travel and transport; sustainability; green and blue infrastructure including open spaces; quality and design excellence; or climate change. Why housing capacity – which says nothing about housing need or affordable housing – is dealt with here rather than in Chapter 17 is not clear; nor is it clear why housing for travellers is highlighted, but not any of the other policies set out in that Chapter. In short, there is no clarity as to how the policies highlighted here relate to the policies set in the subsequent relevant chapters, or why they are set out here.</p> <p>We note further that while the policy seeks ‘the delivery of a net <i>increase</i> in industrial floorspace’ this is not supported by policies elsewhere in the Plan, including the area strategies and Policy LP43, the latter of which seeks merely to protect and retain existing industrial land.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The purpose of this policy is to set out the way in which the Plan meets its principal needs and where in the borough provides the focus for this provision. It covers housing and employment whilst also setting out broad statements on town centres, tourism and education. Though transport is not specifically mentioned, the spatial strategy clearly focuses on places with the greatest accessibility.</p> <p>An increase in net industrial floorspace doesn't necessarily mean an increase industrial land. The plan focuses on intensification and efficiency of land use.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	358
Title	Paragraph
Number	2.104
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	2.104. It is confusing to say the least that this and the succeeding paragraphs on housing are separated from the earlier discussions of housing strategies and objectives in 2.31, 2.34, 2.38, 2.42, 2.47, 2.57, the 18 objectives in the text box on pages 20-21, the social and economic objectives on pages 23-24, and the statements about housing in 2.80-2.83.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	359
Title	Placemaking – Area Strategies
Number	3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 3. Placemaking – Area Strategies</p> <p>We acknowledge improvements in the presentation of the Placemaking and Area strategies as compared with the previous draft Plan. Nevertheless, the fourteen themes or principles on which the area strategies are said to be based are still overlapping – transport, development, and housing, for example, appear twice under different headings – and key terms – such as “responsive development” – are left unexplained and undefined. This is made worse because there is no explicit cross-reference to the discussion of the subset of twelve of the principles set out under the heading of Spatial Strategy in Chapter 2, paragraphs 2.59-102. And we note at this stage that there is no attempt to link the policies and objectives for each of the nine area strategies set out in Chapters 4-13 to the fourteen themes and principles set out in this Chapter. Hence it is impossible to judge whether the policies in those area strategies are in line with the Council’s overall Placemaking strategy and objectives; and they do not meet the test of soundness.</p> <p>In this and the succeeding chapters outlining area strategies, there is no reference to many of the elements required for area assessments set out in the London Plan’s Policy D1 A, including the categories of demographic and socio-economic data specified in D1 A1; housing types and tenure (A2); air quality and noise levels (A5) and topography and hydrology (A8). Indeed, there is no evidence that the kind of area assessments required by Policy DI A have been carried out.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	When developing the area strategies supporting studies were analysed and taken into account, such as; the Air Quality Action Plan, Urban Design Study and the Biodiversity Plan. The Local Plan should be read as whole and therefore duplicating and cross referencing strategies and objectives are not considered necessary.
Proposed Change	No change considered necessary
Consultee Full Name	Mr Mark Broxup

Consultee Organisation Details	General Manager Western Riverside Waste Authority
Agent Full Name	ms niamh burke
Agent Organisation Details	Carter Jonas
Comment ID	360
Title	LP40 Safeguarding Wharves
Number	Policy 51
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP40 - The WRWA supports draft Policy LP40 which acknowledges the potential for the consolidation of safeguarded wharves. This has already occurred in respect of the WRWA's protected wharves at Cringle Dock and Smuggler's Way. This acknowledgement cross references the potential for intensification and upgrading of existing waste sites, as well as for mixed-use development to be achieved on these sites where long-term water freight use and operational capacity are not compromised. 3. Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) - The WRWA own half of the Feather's Wharf site that is identified as draft site allocation WT9 and included within the Feather's Wharf Cluster (previously named Feather's Wharf/Smuggers Way Cluster in the Regulation 18 Local Plan document) and have a development agreement in place with Wandsworth Council that owns the other half of the site. The WRWA also own the Western Riverside Waste Transfer Station (WRWTS), identified as site allocation WT11 in the draft plan, as well as the Household Waste and Recycling Centre (HWRC), which both lie adjacent to the east boundary of the Feather's Wharf site (WT9). In principle, the WRWA strongly supports the inclusion of the Feather's Wharf site allocation (WT9) within the Feather's Wharf Cluster and is fully committed to working with the other landowners within the cluster, to help bring forward the mixed-use redevelopment of the area. In relation to the Feather's Wharf site, paragraph 4.90 of the draft Plan states "the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that contribute towards enhancement of the riverbanks". The recently adopted Wandle Delta Masterplan SPD goes further, identifying a proposed 'major green space' on the Feather's Wharf site. Whilst the importance of high quality public realm and landscaping is recognised and supported, the WRWA considers that the full potential and quality of public realm cannot be realised without considering the full WRWA land ownership in the area (which the Council have failed to do). Furthermore, without the potential for mixed-use development on this site, it is unclear as to how a 'major green space' would be financially viable. The WRWA supports the draft allocation of the WRWTS site as a safeguarded wharf with potential for residential led mixed-use development above including commercial / business (WT11). It is considered however that both the WRWTS and HWRC sites should be allocated for mixed use development. The HWRC site is immediately adjacent to the WRWTS and both are owned by WRWA, and therefore should be treated as a whole. Both sites together offer an excellent opportunity to play a pivotal role in a more comprehensive redevelopment of the area, than that currently proposed. In February 2021, representations were made on behalf of the WRWA to the Regulation 18 Local Plan consultation, and it was suggested that the HWRC should also be allocated for mixed use development. The Council responded that: "the inclusion of the Household Waste and Recycling Centre as a mixed use development would diminish the safeguarded wharf designation and will not be made a site allocation". The WRWA do not consider that the above response provides sufficient justification for the exclusion of the HWRC site from the WT11 allocation. The safeguarded wharf status would not be threatened by the inclusion of the HWRC site in the WT11 allocation (half of the HWRC is designated as a safeguarded wharf); rather there would be potential for a scheme including residential led mixed-use development above to be realised. Such an allocation would not result in a conflict of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf. The Council allocated the WRWA's other facility at Cringle Dock for mixed use development (NE11) and for which planning permission was granted for a replacement facility with enabling residential. The WRWA contends that the same approach should be taken to this site. Accordingly, it would not be effective or justified to necessarily restrict the delivery of development on a suitable brownfield site in the Borough, and for that reason draft allocation WT11 is not sound. In addition</p>

	<p>to a mixed-use allocation, it is considered that the WRWTS and HWRC sites should also be included within the Feather's Wharf Cluster, and it is not clear why they have been excluded from the cluster in the draft Plan as no justification has been provided by the Council. The Council have not applied a consistent approach with regards to the inclusion of sites within the Feather's Wharf Cluster; there is no reason as to why Feather's Wharf (WT9) and Land at The Causeway (WT10) would be included and the WRWTS and HWRC sites would not be. The WRWA consider the Council to have overlooked the conclusions drawn from the Waste Technical Study (2020) which was produced as part of the Local Plan evidence base. The document explains that "the Borough's existing capacity is not enough to meet its need" and that "up to 2.1ha of land will be required by 2026". In addition, the WRWA do not consider that the Council have given appropriate consideration to the Environment Act 2021 (the 'Act'), which was introduced in November 2021. The Act has placed new duties on waste collection authorities for the separate management of food, green waste, packaging and recycling materials. This operational change requires additional space and changes in operations. Therefore the WRWA's waste collection facilities in the Borough will need to expand to receive these materials for treatment or onward transportation. The only land currently available to the WRWA for this is that within draft allocation WT11. It is clear that a comprehensive approach to redevelopment is required for this area and the inclusion of the WRWTS and HWRC would assist with this. The WRWA do not consider that the draft Plan has been positively prepared and therefore draft allocations WT9 and WT10 are not sound as they are not effectively prepared.</p>
Change(s) considered necessary	<p>1. Feather's Wharf / Smugglers Way Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) - As set out in the response to Question 6, the WRWA propose that Paragraph 4.90 of the draft Plan, which states "the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that contribute towards enhancement of the riverbanks", is deleted. The WRWA propose that site allocation WT11 should be extended to include the HWRC as well as the WRWTS which is currently included in the allocation. Furthermore, it is proposed that the Feather's Wharf cluster be amended by the Council to include the WRWTS and HWRC sites. 2. Kirtling Street Cluster; Site Allocation NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock) - As set out in the response to Question 6, the WRWA propose that draft Site Allocation NE9 and draft Site Allocation NE11 should be combined in order for a comprehensive approach to be taken for their redevelopment to create a scheme which is both viable and deliverable and is in line with the attached CDKS Masterplan. With regards to Open Space, the draft policy currently reads as follows: "Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide open space that connects to the proposed Nine Elms Pimlico Footbridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft". This wording should be revised to the following: "Development proposals should incorporate appropriate open space and connectivity to the proposed Nine Elms Pimlico Footbridge and the Thames Path". 3. PM3 Nine Elms - As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves". We note there is a spelling mistake in 'safeguarded wharves' and therefore suggests this is corrected as set out below: As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded wharves".</p>
Wishes to attend Hearing Session	<p>Yes, I wish to participate in hearing session(s)</p>
Reason why	<p>The WRWA owns two waste transfer stations in the Borough, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan and also within the draft Plan. The WRWA do not find the policies in the draft Plan relating to the two sites to be sound and therefore consider it necessary, as significant landowners in the Borough, to participate in the hearing sessions at the Examination in Public. We ask to be notified about future hearing sessions in due course.</p>
Council Response	<p>Comment noted. The emphasis of the WT9 Feathers Wharf site allocation and the Wandle Delta SPD is on the provision of mixed-use development and open space. It is considered that an open space could come forward as part of the redevelopment of the site for mixed use in some form and ultimately viability will be assessed at the application stage. The Council consider that in terms of locating open space on the site there should be an emphasis that this is appropriate at the very north of the site and that the plan could be amended to clarify this.</p> <p>The area of Site Allocation WT11 is considered to be sound. However, it is recognised that there is merit in extending the boundary to the east to include the remainder of the Safeguarded Wharf designation and the HWRC land to assist the comprehensive redevelopment of the area should that be realised in the future.</p> <p>The existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is considered not to be coherent to this approach. Also, any potential redevelopment opportunity is still uncertain at this stage. However, it is considered that the proposed approach would not prevent a comprehensive redevelopment of WT11 Western Riverside Waste Transfer Station and the Feather's Wharf Cluster if that opportunity were to arise in accordance with the site allocations.</p> <p>Given the future implications of the Environment Act it is recommended that wording is added to para 4.89 to say that the Council will work with the WRWA to consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plans for the WRWA.</p>

We consider that the cluster approach would allow for the potential comprehensive redevelopment of the two sites including mixed-use development accounting for the continued operations of both wharves. The preferred approach is to keep these two sites separate as they are two separate wharves with different functions and their future development potential as one site is still somewhat uncertain. Para 5.29 of the Reg 19 Plan emphasises the development potential of both sites having regard to their safeguarded wharf status. However, it is acknowledged that the wording of the development considerations section could be strengthened to identify the opportunity for the redevelopment of both sites as one including additional waste capacity which could be addressed in para 5.29.

A continuation of the Thames Path is sought to the northern part of Cringle Dock which will include public realm enhancements where possible. The northern side of Kirtling Wharf will require appropriate public open space as part of the Thames Tideway access shaft, the continuation of the Thames Path, and the landing point for the proposed Nine Elms Pimlico Bridge. It is proposed that wording be amended to clarify the exact location of the open space.

Proposed Change

Amend Map 4.1 Strategy Area Map: Wandsworth Town as follows:

Remove 'Proposed New Public Open Space' (Green shape) from WT9 Feather's Wharf.

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Amend Map 3.2 Site Allocation Map; Map 4.1 Spatial Area Map Wandsworth Town; and Map 4.8 Western Riverside Waste Transfer Station as follows:

Updated boundary for WT11 Western Riverside Waste Transfer Station which includes the Household Waste and Recycling Centre

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Amend wording of para 4.100 as follows:

'The site lies to the north of Smugglers Way adjacent to the bank of the River Thames. To the west of the site is Feathers Wharf *and to the east is the Waterside Path and Riverside East apartments a Household Waste Recycling Centre*. The site is used as a Waste Transfer Station *and as a household waste recycling centre*. The site is operated by the Western Riverside Waste Authority (WRWA) which is the statutory body responsible for the management of the waste delivered to it by the London boroughs of Wandsworth, Lambeth, Kensington and Chelsea and Hammersmith & Fulham. The site is used as a Waste Transfer Station *and as a household waste recycling centre* which utilises its riverside position and wharf facilities for bulk transportation of waste to an Energy from Waste Facility at Belvedere in the London Borough of Bexley. The current use of the site provides an important strategic role. Site Area 3.22-49ha.'

Amend wording to para 4.101 as follows:

'*The majority of the site is designated as a safeguarded wharf, except for south-east corner*, with potential for residential led mixed-use development above including commercial/ business ... Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf area.'

Amend wording to para 4.89 bullet point 3 as follows:

"4.89 Uses - ... There are appropriate temporary uses for the short to medium term including potential use of the southern part of the site for waste management purposes that do not compromise the long-term development of the site. *Due to the new requirements for waste management set out in the Environment Act 2021, the Council will work with the WRWA and*

consider any potential opportunity to plan for waste management on WT9 Feather's Wharf in accordance with any future expansion plan for the WRWA. Temporary use of the site should also include the safeguarding of, and extension to, the riverside walk adjoining the Thames and the River Wandle.

Amend wording to Para 5.29 (bullet point 2) as follows:

"Para 5.29 Uses ... Development proposals should maximise the *development* potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transhipment of freight, waterborne freight handling use and freight-related activities. *Proposals should consider the feasibility of the comprehensive and combined development of both sites.* Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water."

Amend wording to Para 5.30 as follows:

'5.30 Open Space - Proposals to the north of the cluster *at* the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide *appropriate public* open space that connects to the proposed Nine Elms Pimlico Bridge *and* the Thames *Path and subject to the operation and maintenance requirements of* the Thames Tideway Tunnel access shaft. *Proposals* will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge. *Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.*

Amend the wording of PM3 People First (5) as follows:

'PM3 People First (5): the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the *safeguarded* safe-guarded wharves.

Consultee Full Name	Mr Mark Broxup
Consultee Organisation Details	General Manager Western Riverside Waste Authority
Agent Full Name	ms niamh burke
Agent Organisation Details	Carter Jonas
Comment ID	361
Title	NE9 Kirtling Wharf, Nine Elms, SW8
Number	Statement 26
Soundness - Legally Compliant?	No
Soundness - Sound?	No

If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Kirtling Street Cluster; Site Allocation NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock) - WRWA owns the Cringle Dock site that is identified as site allocation NE11 and included within the Kirtling Street Cluster. In order to understand the context of the WRWA's comments on the development potential of Cringle Dock and the adjoining Kirtling Wharf, it is important to briefly consider the history of Cringle Dock. It was built in the 1970s as a riparian waste transfer station that pulverised waste before sending it to landfill. In the 1990s the operation changed to containerisation of the waste before transport downriver to a resource recovery energy facility at Bexley. The transformation sought for the area set out in the Vauxhall Nine Elms Battersea Opportunity Area Framework included the regeneration of Battersea Power Station as a flagship element of the vision for the area. The masterplan for Battersea Power Station, which wrapped around the Cringle Dock WTS, showed that: 1. it provides an essential public service, 2. it has exceeded its design life and needs to be replaced, 3. it has to be located next to the river, and 4. its replacement is essential to the delivery of Phase 6 of the masterplan and associated 1m sq ft of mixed use development. Although it was already clear that a nearly 50 year old waste transfer station at Cringle Dock was visually, environmentally and aesthetically out of place next to Battersea Power Station, it was the grant of planning permission in 2016 for the replacement of the Cringle Dock WTS that established the site's potential to include mixed-use development. The approved proposal included construction of a new modernised WTS within an enclosed structure, provision of up to 442 residential units above the enclosed WTS and associated landscaping and parking. It was modified slightly in 2017. There were 4 main reasons why the scheme did not progress: 1. The transitional engagements were subsequently found to be unworkable owing to service disruption, increased operational costs and harmful impacts on local amenity arising from diversion of waste movement from river to road; 2. The costs of building residential over a new WTS were prohibitive; 3. The resultant constraints on the design and quality of the residential rendered the new homes to be below the standard required by homeowners, and thus the scheme became unviable and unfundable; and 4. Fire safety concerns relating to residential over an operational WTS resulted in the scheme becoming unworkable. The underlying reasons why the Cringle Dock WTS needs to be replaced have not changed. However, there has been a catalyst for change which leads the WRWA and Cory to consider that a revised scheme would be viable and deliverable on the combined sites of Cringle Dock and Kirtling Street. The catalyst is the acquisition of Kirtling Street and neighbouring land by the Thames Tideway Tunnel and the completion of those works which have reached the stage at which restoration of the site is required. The WRWA and Cory appointed a technical project team to assess the options to replace the Cringle Dock WTS and produce conditions that would support the completion of the Battersea Power Station Masterplan (Phases 5, 6 and 7). The draft site allocation proposes mixed use development in the cluster with business uses on the ground floor and residential use on the upper floors. The WRWA support the principle of mixed use development however are also aware that the redevelopment of Cringle Dock on its own is simply not viable or deliverable. In order to deliver a solution that maintains the strategic waste service, satisfies the requirements of the Mayor's Safeguarded Wharf policy and delivers the need of the wider area (including the provision of a continuous riverside walk) it is essential that the Cringle Dock and Kirtling Wharf sites are considered together in planning terms. The WRWA consider that the draft Site Allocation NE9 and draft Site Allocation NE11 should be combined in order for a comprehensive approach to be taken for their redevelopment. Appended to these representations is a Cringle Dock and Kirtling Street (CDKS) Masterplan produced by Wood plc which demonstrates how a comprehensive redevelopment of Cringle Dock and Kirtling Wharf could be achieved. The WRWA consider that, with this approach, a better arrangement of land uses can be achieved, and this would also allow for a more appropriate transition between these sites and the edge of the Battersea Power Station site. The CDKS Masterplan: • Will seek to improve the transport environment integrating public and private transport, including active travel • Will maximise opportunities for cycling and walking, including connections into the proposed Pimlico bridge • Includes a riverside walk • Acknowledges that NE9 is suitable for a landmark building • Improves frontages, streetscape, public realm and signage • Achieves active frontages onto key routes • Provides a high quality public realm • Delivers high quality open space • Enables Phase 6 of the Battersea Power Station Masterplan to be implemented. The CDKS Masterplan demonstrates that by 2026, Cringle Dock and Kirtling Wharf will have been comprehensively redeveloped and will accommodate a sympathetically designed, modern waste transfer station (WTS) capable of safely and efficiently meeting the statutory customer service obligations of Western Riverside Waste Authority (WRWA). It will also satisfy Thames Tideway Tunnel's ongoing tunnel and maintenance and emergency access safeguarding requirements at Kirtling Wharf. The aggregation of Cringle Dock and Kirtling Wharf estates, and the resultant intensification of operational floorspace and repurposing of the existing dock and jetty, will provide opportunities to increase the combined operational capacity of the waste and logistics area to exceed the current capacity. A fully enclosed WTS will be an exemplar facility, benefitting from off-street vehicle processing and holding areas, advanced waste handling and logistics infrastructure, and state of the art security, surveillance and control systems to manage emissions, energy and water consumption, ventilation, safety, pollution and fire. The WTS will be amongst the first purpose-built facilities in the country capable of supporting fully decarbonised bulk handling and river and road haulage operations, progressively contributing to improved air quality in London. Furthermore, the new facility will also increase WRWA's overall service resilience by providing flexible operational space to respond to emerging regulations requiring the separate management of waste streams (including food and green waste). Following the commissioning of the new WTS, and the demolition of the former waste facility, a major new residential mixed-use development will be developed in its place. Physically segregated from the new waste and logistics areas to safeguard the security and amenity of its occupiers, the mixed-use zone will benefit from its own vehicle and pedestrian access arrangements. The new mixed-use development will provide up to 400 residential units and a range of tenure options, including private market/owner-occupier housing, shared ownership, and affordable rental properties. The development of these sites will make a material contribution to the delivery of London Plan and Local Plan housing targets. There is also the potential to provide additional commercial space over the new facility. The intensification of industrial, logistics and commercial uses is supported by the London Plan and draft Local Plan. The proposals for the site would make a material contribution to meeting targets for the provision of this space. It is estimated that circa. 34,000 sqm of commercial office and light industrial floorspace could be developed which could support circa 1,200 – 1,500 jobs depending</p>

on the typology of commercial floorspace delivered. There are a number of key drivers for the comprehensive redevelopment of the Cringle Dock and Kirtling Wharf sites including the urgent need to upgrade critical waste management infrastructure (already well beyond its end of life) while maintaining service continuity, meeting the WRWA's ongoing statutory service obligations. The introduction of the Environment Act 2021 and the aforementioned Borough-wide waste management capacity deficiency which provide further justification for the requirement for redevelopment. The proposed replacement waste transfer facility at Cringle Dock/Kirtling Street would be internalised, thus delivering an important objective to improve air quality and enhance the general environment. The new facility will enable a greater volume of waste to be processed, thus ensuring that the identified deficit in waste management is addressed. As mentioned, there is an urgent need to address the identified shortfall in waste management and the draft proposals are a viable and deliverable solution to achieve this. It will also realise wider air quality, environmental and regeneration benefits. The proposed development will address part of the current London and WRWA waste management capacity deficiency and comply with the requirement that there be no net loss in waste management through the protection (and expansion) of an existing waste management facility. The proposed development is also consistent with the London-wide Transport Strategy set out in the London Plan to include greater use of the River Thames to reduce congestion, improve air quality and safety (Policy SI 15). The proposed development maintains access to the river and is consistent with this important strategic objective. The proposals will also maintain access to the waterfront at all times. Redevelopment is key to facilitate the delivery of the Battersea Power Station Masterplan phases 5, 6, and 7, including a safe and efficient access and transportation system for the locality. Furthermore, imminent completion of the Thames Tideway Kirtling Wharf works, site restoration and market disposal represents a once in a generation opportunity to complete the Battersea Power Station Masterplan. This indicative scheme would involve the loss of part of the safeguarded wharf area designated at Cringle Dock (i.e. loss of 0.355ha), however the WRWA is able to offer 0.420ha of land at Smuggler's Way to compensate for this loss should be it be required because the land to the south-east of the Smuggler's Way site is not currently including in the safeguarded wharf designation. The safeguarded wharf designations for Cringle Dock and Smuggler's Way have been appended to these representations for reference purposes. The WRWA are aware of the requirement to respect the statutory safeguarding protection for Cringle Dock and Kirtling wharves and therefore with any redevelopment of the sites it is imperative that the design process has full regard to the current and future operation of the safeguarded wharves, including maintaining appropriate access arrangements and hours of operation. For example, areas of open space and balconies will have to be carefully considered for residential uses. Paragraph 5.30 of the draft Plan states "proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide open space that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft. It will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge". References to the open space are also included at paragraphs 5.27 and 5.28 of the draft Plan. Map 5.3 'Spatial Area Map: Kirtling Street Cluster' on p. 115 of the draft Plan shows an area on the eastern side of Kirtling Wharf to be the suggested location for the new public open space. The WRWA acknowledge that this is a suggested location and understand that an exact location has not yet been confirmed. The WRWA make the below comments in respect of the open space given that the policy wording explains that it is required to be provided "to the north of the cluster in the Kirtling Wharf and Cringle Dock sites". As mentioned above, in February 2021, representations were made on behalf of the WRWA to the Regulation 18. Local Plan consultation questioning the inclusion of open space in this location. The Council's response was as follows: "the site allocation wording is considered sufficient as the open space to the north is considered necessary to link into the development of the Thames Path, the Nine Elms Pimlico Bridge, and the Thames Tideway access shaft". The wording in paragraph 5.30 of the draft Plan is directly contradicted by the following wording at paragraph 5.36 "at Cringle Dock (NE11), buildings should front on to Cringle Street and the River Thames above the waste transfer station". The WRWA are unclear as to how both open space and buildings fronting the river can be achieved in the same location. Furthermore, as previously mentioned, Cringle Dock and Kirtling Wharf are safeguarded wharves and are protected by Policy SI 15 'Water Transport' of the London Plan (2021) which states "development proposals on a safeguarded wharf that include the provision of a water freight below or alongside another land use, must ensure that the water freight use is secured long-term, that the development is designed so that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced". Paragraph 5.30 of the draft Plan does not acknowledge the fact that the WRWA has a statutory duty to provide waste disposal services to four London Boroughs and Cringle Dock is an operational waste transfer station. Located at the eastern end of Cringle Street, it has frontage onto the River Thames to the north, adjoins the Battersea Power Station site to the west and industrial land to the west. There are no opportunities for riverside access at this point. Whilst the WRWA appreciate that a redevelopment solution must satisfy the Thames Tideway Kirtling Wharf maintenance and emergency access safeguarding requirements, it considers that the provision of open space in this location, as suggested by the draft policy, would result in a conflict of use with the safeguarded wharf and is therefore considered to be inconsistent with London Plan Policy SI 15. Section 20 of the Planning and Compulsory Purchase Act 2004 ("PCPA 2004") provides that the purpose of an independent examination into a development plan document is to determine, inter alia, whether it is "sound" and whether it satisfies the requirements of section 19 of the PCPA 2004. Section 19(2) of the PCPA 2004 provides that "In preparing a local development document the local planning authority must have regard to... (c) the spatial development strategy if the authority are a London Borough or if any party of the authority's area adjoins Greater London". Additionally, s.24(1)(b) PCPA 2004 requires that the Local Plan "must be in general conformity with...the spatial development strategy". Consequently, the PCPA 2004 requires the Local Plan to be prepared having regard to, and to be in general conformity with, the London Plan. Those are "legal requirements" which paragraph 35 of the National Planning Policy Framework (NPPF) (2021) requires the Local Plan to adhere to. The WRWA does not consider the Local Plan to be consistent with the legal requirements of the NPPF and therefore draft allocation NE11 is not sound. In terms of next steps, the WRWA and Cory are preparing a formal pre-application submission to the Council which will progress the emerging proposals to the next stage of design evolution. It is anticipated that this pre-application meeting could take place in the next 3 months. It is important that there is connection between the policy team and the development management team of the Council as the proposals emerge, and we reserve the right to update these representations to reflect the outcome of the pre-application process.

Change(s) considered necessary

1. Feather's Wharf / Smugglers Way Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) - As set out in the response to Question 6, the WRWA propose that Paragraph 4.90 of the draft Plan, which states "the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that contribute towards enhancement of the riverbanks", is deleted. The WRWA propose that site allocation WT11 should be extended to include the HWRC as well as the WRWTS which is currently included in the allocation. Furthermore, it is proposed that the Feather's Wharf cluster be amended by the Council to include the WRWTS and HWRC sites. 2. Kirtling Street Cluster; Site Allocation

	<p>NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock) - As set out in the response to Question 6, the WRWA propose that draft Site Allocation NE9 and draft Site Allocation NE11 should be combined in order for a comprehensive approach to be taken for their redevelopment to create a scheme which is both viable and deliverable and is in line with the attached CDKS Masterplan. With regards to Open Space, the draft policy currently reads as follows: "Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide open space that connects to the proposed Nine Elms Pimlico Footbridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft". This wording should be revised to the following: "Development proposals should incorporate appropriate open space and connectivity to the proposed Nine Elms Pimlico Footbridge and the Thames Path". 3. PM3 Nine Elms - As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves". We note there is a spelling mistake in 'safeguarded wharves' and therefore suggests this is corrected as set out below: As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded wharves".</p>
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The WRWA owns two waste transfer stations in the Borough, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan and also within the draft Plan. The WRWA do not find the policies in the draft Plan relating to the two sites to be sound and therefore consider it necessary, as significant landowners in the Borough, to participate in the hearing sessions at the Examination in Public. We ask to be notified about future hearing sessions in due course.
Council Response	<p>Comment noted. The emphasis of the WT9 Feathers Wharf site allocation and the Wandle Delta SPD is on the provision of mixed-use development and open space. It is considered that an open space could come forward as part of the redevelopment of the site for mixed use in some form and ultimately viability will be assessed at the application stage. The Council consider that in terms of locating open space on the site there should be an emphasis that this is appropriate at the very north of the site and that the plan could be amended to clarify this.</p> <p>The area of Site Allocation WT11 is considered to be sound. However, it is recognised that there is merit in extending the boundary to the east to include the remainder of the Safeguarded Wharf designation and the HWRC land to assist the comprehensive redevelopment of the area should that be realised in the future.</p> <p>The existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is considered not to be coherent to this approach. Also, any potential redevelopment opportunity is still uncertain at this stage. However, it is considered that the proposed approach would not prevent a comprehensive redevelopment of WT11 Western Riverside Waste Transfer Station and the Feather's Wharf Cluster if that opportunity were to arise in accordance with the site allocations.</p> <p>We consider that the cluster approach would allow for the potential comprehensive redevelopment of the two sites including mixed-use development accounting for the continued operations of both wharves. The preferred approach is to keep these two sites separate as they are two separate wharves with different functions and their future development potential as one site is still somewhat uncertain. Para 5.29 of the Reg 19 Plan emphasises the development potential of both sites having regard to their safeguarded wharf status. However, it is acknowledged that the wording of the development considerations section could be strengthened to identify the opportunity for the redevelopment of both sites as one including additional waste capacity which could be addressed in para 5.29.</p> <p>A continuation of the Thames Path is sought to the northern part of Cringle Dock which will include public realm enhancements where possible. The northern side of Kirtling Wharf will require appropriate public open space as part of the Thames Tideway access shaft, the continuation of the Thames Path, and the landing point for the proposed Nine Elms Pimlico Bridge. It is proposed that wording be amended to clarify the exact location of the open space.</p> <p>It is considered that the site allocation is sound, however, additional detail could be included to clarify that new uses do not harm the safeguarded wharf designations.</p>

Although this could potentially be supported in principle, the Council are not the arbiters of changing the boundaries of safeguarded wharves and so any agreement would need to be sought between WRWA, the Secretary of State for DLUHC / the Mayor of London.

To clarify, the buildings that front the river would be expected to be set back from the river in accordance with para 5.37 Movement (bullet point 3).

Agree that Paragraph 5.30 could be amended to remove reference to open space north of Cringle Dock (NE11).

Proposed Change

Amend Map 4.1 Strategy Area Map: Wandsworth Town as follows:

Remove 'Proposed New Public Open Space' (Green shape) from WT9 Feather's Wharf.

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Amend Map 3.2 Site Allocation Map; Map 4.1 Spatial Area Map Wandsworth Town; and Map 4.8 Western Riverside Waste Transfer Station as follows:

Updated boundary for WT11 Western Riverside Waste Transfer Station which includes the Household Waste and Recycling Centre

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Amend wording of para 4.100 as follows:

'The site lies to the north of Smugglers Way adjacent to the bank of the River Thames. To the west of the site is Feathers Wharf *and to the east is the Waterside Path and Riverside East apartments a Household Waste Recycling Centre*. The site is used as a Waste Transfer Station *and as a household waste recycling centre*. The site is operated by the Western Riverside Waste Authority (WRWA) which is the statutory body responsible for the management of the waste delivered to it by the London boroughs of Wandsworth, Lambeth, Kensington and Chelsea and Hammersmith & Fulham. The site is used as a Waste Transfer Station *and as a household waste recycling centre* which utilises its riverside position and wharf facilities for bulk transportation of waste to an Energy from Waste Facility at Belvedere in the London Borough of Bexley. The current use of the site provides an important strategic role. Site Area 3.22-49ha.'

Amend wording to para 4.101 as follows:

'*The majority of the site is designated as a Ssafeguarded wharf, except for south-east corner*, with potential for residential led mixed-use development above including commercial/ business ... Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf area.'

Amend wording to Para 5.29 (bullet point 2) as follows:

"Para 5.29 Uses ... Development proposals should maximise the development potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transshipment of freight, waterborne freight handling use and freight-related activities. Proposals

should consider the feasibility of the comprehensive and combined development of both sites. Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water."

Amend wording to Para 5.30 as follows:

'5.30 Open Space - Proposals to the north of the cluster at the Kirtling Wharf and Cringle Dock sites (NE9, NE14) will be required to provide appropriate public open space that connects to the proposed Nine Elms Pimlico Bridge and the Thames Path and subject to the operation and maintenance requirements of the Thames Tideway Tunnel access shaft. Proposals will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge. Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.'

Amend the wording of PM3 People First (5) as follows:

'PM3 People First (5): the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded ~~safe-guarded~~ wharves.'

Consultee Full Name	Mr Mark Broxup
Consultee Organisation Details	General Manager Western Riverside Waste Authority
Agent Full Name	ms niamh burke
Agent Organisation Details	Carter Jonas
Comment ID	362
Title	NE11 Cringle Dock, Nine Elms, SW8
Number	Statement 27
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes

Details of reason(s) for representation

Kirtling Street Cluster; Site Allocation NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock) - WRWA owns the Cringle Dock site that is identified as site allocation NE11 and included within the Kirtling Street Cluster. In order to understand the context of the WRWA's comments on the development potential of Cringle Dock and the adjoining Kirtling Wharf, it is important to briefly consider the history of Cringle Dock. It was built in the 1970s as a riparian waste transfer station that pulverised waste before sending it to landfill. In the 1990s the operation changed to containerisation of the waste before transport downriver to a resource recovery energy facility at Bexley. The transformation sought for the area set out in the Vauxhall Nine Elms Battersea Opportunity Area Framework included the regeneration of Battersea Power Station as a flagship element of the vision for the area. The masterplan for Battersea Power Station, which wrapped around the Cringle Dock WTS, showed that: 1. it provides an essential public service, 2. it has exceeded its design life and needs to be replaced, 3. it has to be located next to the river, and 4. its replacement is essential to the delivery of Phase 6 of the masterplan and associated 1m sq ft of mixed use development. Although it was already clear that a nearly 50 year old waste transfer station at Cringle Dock was visually, environmentally and aesthetically out of place next to Battersea Power Station, it was the grant of planning permission in 2016 for the replacement of the Cringle Dock WTS that established the site's potential to include mixed-use development. The approved proposal included construction of a new modernised WTS within an enclosed structure, provision of up to 442 residential units above the enclosed WTS and associated landscaping and parking. It was modified slightly in 2017. There were 4 main reasons why the scheme did not progress: 1. The transitional engagements were subsequently found to be unworkable owing to service disruption, increased operational costs and harmful impacts on local amenity arising from diversion of waste movement from river to road; 2. The costs of building residential over a new WTS were prohibitive; 3. The resultant constraints on the design and quality of the residential rendered the new homes to be below the standard required by homeowners, and thus the scheme became unviable and unfundable; and 4. Fire safety concerns relating to residential over an operational WTS resulted in the scheme becoming unworkable. The underlying reasons why the Cringle Dock WTS needs to be replaced have not changed. However, these has been a catalyst for change which leads the WRWA and Cory to consider that a revised scheme would be viable and deliverable on the combined sites of Cringle Dock and Kirtling Street. The catalyst is the acquisition of Kirtling Street and neighbouring land by the Thames Tideway Tunnel and the completion of those works which have reached the stage at which restoration of the site is required. The WRWA and Cory appointed a technical project team to assess the options to replace the Cringle Dock WTS and produce conditions that would support the completion of the Battersea Power Station Masterplan (Phases 5, 6 and 7). The draft site allocation proposes mixed use development in the cluster with business uses on the ground floor and residential use on the upper floors. The WRWA support the principle of mixed use development however are also aware that the redevelopment of Cringle Dock on its own is simply not viable or deliverable. In order to deliver a solution that maintains the strategic waste service, satisfies the requirements of the Mayor's Safeguarded Wharf policy and delivers the need of the wider area (including the provision of a continuous riverside walk) it is essential that the Cringle Dock and Kirtling Wharf sites are considered together in planning terms. The WRWA consider that the draft Site Allocation NE9 and draft Site Allocation NE11 should be combined in order for a comprehensive approach to be taken for their redevelopment. Appended to these representations is a Cringle Dock and Kirtling Street (CDKS) Masterplan produced by Wood plc which demonstrates how a comprehensive redevelopment of Cringle Dock and Kirtling Wharf could be achieved. The WRWA consider that, with this approach, a better arrangement of land uses can be achieved, and this would also allow for a more appropriate transition between these sites and the edge of the Battersea Power Station site. The CDKS Masterplan: • Will seek to improve the transport environment integrating public and private transport, including active travel • Will maximise opportunities for cycling and walking, including connections into the proposed Pimlico bridge • Includes a riverside walk • Acknowledges that NE9 is suitable for a landmark building • Improves frontages, streetscape, public realm and signage • Achieves active frontages onto key routes • Provides a high quality public realm • Delivers high quality open space • Enables Phase 6 of the Battersea Power Station Masterplan to be implemented. The CDKS Masterplan demonstrates that by 2026, Cringle Dock and Kirtling Wharf will have been comprehensively redeveloped and will accommodate a sympathetically designed, modern waste transfer station (WTS) capable of safely and efficiently meeting the statutory customer service obligations of Western Riverside Waste Authority (WRWA). It will also satisfy Thames Tideway Tunnel's ongoing tunnel and maintenance and emergency access safeguarding requirements at Kirtling Wharf. The aggregation of Cringle Dock and Kirtling Wharf estates, and the resultant intensification of operational floorspace and repurposing of the existing dock and jetty, will provide opportunities to increase the combined operational capacity of the waste and logistics area to exceed the current capacity. A fully enclosed WTS will be an exemplar facility, benefitting from off-street vehicle processing and holding areas, advanced waste handling and logistics infrastructure, and state of the art security, surveillance and control systems to manage emissions, energy and water consumption, ventilation, safety, pollution and fire. The WTS will be amongst the first purpose-built facilities in the country capable of supporting fully decarbonised bulk handling and river and road haulage operations, progressively contributing to improved air quality in London. Furthermore, the new facility will also increase WRWA's overall service resilience by providing flexible operational space to respond to emerging regulations requiring the separate management of waste streams (including food and green waste). Following the commissioning of the new WTS, and the demolition of the former waste facility, a major new residential mixed-use development will be developed in its place. Physically segregated from the new waste and logistics areas to safeguard the security and amenity of its occupiers, the mixed-use zone will benefit from its own vehicle and pedestrian access arrangements. The new mixed-use development will provide up to 400 residential units and a range of tenure options, including private market/owner-occupier housing, shared ownership, and affordable rental properties. The development of these sites will make a material contribution to the delivery of London Plan and Local Plan housing targets. There is also the potential to provide additional commercial space over the new facility. The intensification of industrial, logistics and commercial uses is supported by the London Plan and draft Local Plan. The proposals for the site would make a material contribution to meeting targets for the provision of this space. It is estimated that circa. 34,000 sqm of commercial office and light industrial floorspace could be developed which could support circa 1,200 – 1,500 jobs depending on the typology of commercial floorspace delivered. There are a number of key drivers for the comprehensive redevelopment of the Cringle Dock and Kirtling Wharf sites including the urgent need to upgrade critical waste management infrastructure (already well beyond its end of life) while maintaining service continuity, meeting the WRWA's ongoing statutory service obligations. The introduction of the Environment Act 2021 and the aforementioned Borough-wide waste management capacity deficiency which provide further justification for the requirement for redevelopment. The proposed replacement waste transfer facility at Cringle Dock/Kirtling Street would be internalised, thus delivering an important objective to improve air quality and enhance the general environment. The new facility will enable a greater volume of waste to be processed, thus ensuring that the identified deficit in waste management is addressed. As mentioned, there is an urgent need to address the identified shortfall in waste management and the draft proposals are a viable and deliverable solution to achieve this. It will also realise wider air quality, environmental and regeneration benefits. The proposed development will address part of the current London and WRWA waste management capacity deficiency and comply with the requirement that there be no net loss in waste management through the protection (and expansion) of an existing waste management facility. The proposed development is also consistent with the London-wide Transport Strategy set out in the London Plan to include greater use of the River Thames to reduce congestion, improve air quality and safety

(Policy SI 15). The proposed development maintains access to the river and is consistent with this important strategic objective. The proposals will also maintain access to the waterfront at all times. Redevelopment is key to facilitate the delivery of the Battersea Power Station Masterplan phases 5, 6, and 7, including a safe and efficient access and transportation system for the locality. Furthermore, imminent completion of the Thames Tideway Kirtling Wharf works, site restoration and market disposal represents a once in a generation opportunity to complete the Battersea Power Station Masterplan. This indicative scheme would involve the loss of part of the safeguarded wharf area designated at Cringle Dock (i.e. loss of 0.355ha), however the WRWA is able to offer 0.420ha of land at Smuggler's Way to compensate for this loss should be it be required because the land to the south-east of the Smuggler's Way site is not currently including in the safeguarded wharf designation. The safeguarded wharf designations for Cringle Dock and Smuggler's Way have been appended to these representations for reference purposes. The WRWA are aware of the requirement to respect the statutory safeguarding protection for Cringle Dock and Kirtling wharves and therefore with any redevelopment of the sites it is imperative that the design process has full regard to the current and future operation of the safeguarded wharves, including maintaining appropriate access arrangements and hours of operation. For example, areas of open space and balconies will have to be carefully considered for residential uses. Paragraph 5.30 of the draft Plan states "proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide open space that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft. It will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge". References to the open space are also included at paragraphs 5.27 and 5.28 of the draft Plan. Map 5.3 'Spatial Area Map: Kirtling Street Cluster' on p. 115 of the draft Plan shows an area on the eastern side of Kirtling Wharf to be the suggested location for the new public open space. The WRWA acknowledge that this is a suggested location and understand that an exact location has not yet been confirmed. The WRWA make the below comments in respect of the open space given that the policy wording explains that it is required to be provided "to the north of the cluster in the Kirtling Wharf and Cringle Dock sites". As mentioned above, in February 2021, representations were made on behalf of the WRWA to the Regulation 18. Local Plan consultation questioning the inclusion of open space in this location. The Council's response was as follows: "the site allocation wording is considered sufficient as the open space to the north is considered necessary to link into the development of the Thames Path, the Nine Elms Pimlico Bridge, and the Thames Tideway access shaft". The wording in paragraph 5.30 of the draft Plan is directly contradicted by the following wording at paragraph 5.36 "at Cringle Dock (NE11), buildings should front on to Cringle Street and the River Thames above the waste transfer station". The WRWA are unclear as to how both open space and buildings fronting the river can be achieved in the same location. Furthermore, as previously mentioned, Cringle Dock and Kirtling Wharf are safeguarded wharves and are protected by Policy SI 15 'Water Transport' of the London Plan (2021) which states "development proposals on a safeguarded wharf that include the provision of a water freight below or alongside another land use, must ensure that the water freight use is secured long-term, that the development is designed so that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced". Paragraph 5.30 of the draft Plan does not acknowledge the fact that the WRWA has a statutory duty to provide waste disposal services to four London Boroughs and Cringle Dock is an operational waste transfer station. Located at the eastern end of Cringle Street, it has frontage onto the River Thames to the north, adjoins the Battersea Power Station site to the west and industrial land to the west. There are no opportunities for riverside access at this point. Whilst the WRWA appreciate that a redevelopment solution must satisfy the Thames Tideway Kirtling Wharf maintenance and emergency access safeguarding requirements, it considers that the provision of open space in this location, as suggested by the draft policy, would result in a conflict of use with the safeguarded wharf and is therefore considered to be inconsistent with London Plan Policy SI 15. Section 20 of the Planning and Compulsory Purchase Act 2004 ("PCPA 2004") provides that the purpose of an independent examination into a development plan document is to determine, inter alia, whether it is "sound" and whether it satisfies the requirements of section 19 of the PCPA 2004. Section 19(2) of the PCPA 2004 provides that "In preparing a local development document the local planning authority must have regard to... (c) the spatial development strategy if the authority are a London Borough or if any party of the authority's area adjoins Greater London". Additionally, s.24(1)(b) PCPA 2004 requires that the Local Plan "must be in general conformity with...the spatial development strategy". Consequently, the PCPA 2004 requires the Local Plan to be prepared having regard to, and to be in general conformity with, the London Plan. Those are "legal requirements" which paragraph 35 of the National Planning Policy Framework (NPPF) (2021) requires the Local Plan to adhere to. The WRWA does not consider the Local Plan to be consistent with the legal requirements of the NPPF and therefore draft allocation NE11 is not sound. In terms of next steps, the WRWA and Cory are preparing a formal pre-application submission to the Council which will progress the emerging proposals to the next stage of design evolution. It is anticipated that this pre-application meeting could take place in the next 3 months. It is important that there is connection between the policy team and the development management team of the Council as the proposals emerge, and we reserve the right to update these representations to reflect the outcome of the pre-application process.

Change(s) considered necessary

1. Feather's Wharf / Smugglers Way Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) - As set out in the response to Question 6, the WRWA propose that Paragraph 4.90 of the draft Plan, which states "the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that contribute towards enhancement of the riverbanks", is deleted. The WRWA propose that site allocation WT11 should be extended to include the HWRC as well as the WRWTS which is currently included in the allocation. Furthermore, it is proposed that the Feather's Wharf cluster be amended by the Council to include the WRWTS and HWRC sites. 2. Kirtling Street Cluster; Site Allocation NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock) - As set out in the response to Question 6, the WRWA propose that draft Site Allocation NE9 and draft Site Allocation NE11 should be combined in order for a comprehensive approach to be taken for their redevelopment to create a scheme which is both viable and deliverable and is in line with the attached CDKS Masterplan. With regards to Open Space, the draft policy currently reads as follows: "Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide open space that connects to the proposed Nine Elms Pimlico Footbridge, the Thames Path and the open space above the Thames Tideway Tunnel access shaft". This wording should be revised to the following: "Development proposals should incorporate appropriate open space and connectivity to the proposed Nine Elms Pimlico Footbridge and the Thames Path". 3. PM3 Nine Elms - As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves". We note there is a spelling mistake in 'safeguarded wharves' and therefore suggests this is corrected as set out below: As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel

	and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded wharves".
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The WRWA owns two waste transfer stations in the Borough, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan and also within the draft Plan. The WRWA do not find the policies in the draft Plan relating to the two sites to be sound and therefore consider it necessary, as significant landowners in the Borough, to participate in the hearing sessions at the Examination in Public. We ask to be notified about future hearing sessions in due course.
Council Response	<p>Comment noted. The emphasis of the WT9 Feathers Wharf site allocation and the Wandle Delta SPD is on the provision of mixed-use development and open space. It is considered that an open space could come forward as part of the redevelopment of the site for mixed use in some form and ultimately viability will be assessed at the application stage. The Council consider that in terms of locating open space on the site there should be an emphasis that this is appropriate at the very north of the site and that the plan could be amended to clarify this.</p> <p>The area of Site Allocation WT11 is considered to be sound. However, it is recognised that there is merit in extending the boundary to the east to include the remainder of the Safeguarded Wharf designation and the HWRC land to assist the comprehensive redevelopment of the area should that be realised in the future.</p> <p>The existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is considered not to be coherent to this approach. Also, any potential redevelopment opportunity is still uncertain at this stage. However, it is considered that the proposed approach would not prevent a comprehensive redevelopment of WT11 Western Riverside Waste Transfer Station and the Feather's Wharf Cluster if that opportunity were to arise in accordance with the site allocations.</p> <p>We consider that the cluster approach would allow for the potential comprehensive redevelopment of the two sites including mixed-use development accounting for the continued operations of both wharves. The preferred approach is to keep these two sites separate as they are two separate wharves with different functions and their future development potential as one site is still somewhat uncertain. Para 5.29 of the Reg 19 Plan emphasises the development potential of both sites having regard to their safeguarded wharf status. However, it is acknowledged that the wording of the development considerations section could be strengthened to identify the opportunity for the redevelopment of both sites as one including additional waste capacity which could be addressed in para 5.29.</p> <p>A continuation of the Thames Path is sought to the northern part of Cringle Dock which will include public realm enhancements where possible. The northern side of Kirtling Wharf will require appropriate public open space as part of the Thames Tideway access shaft, the continuation of the Thames Path, and the landing point for the proposed Nine Elms Pimlico Bridge. It is proposed that wording be amended to clarify the exact location of the open space.</p> <p>It is considered that the site allocation is sound, however, additional detail could be included to clarify that new uses do not harm the safeguarded wharf designations.</p> <p>Although this could potentially be supported in principle, the Council are not the arbiters of changing the boundaries of safeguarded wharves and so any agreement would need to be sought between WRWA, the Secretary of State for DLUHC / the Mayor of London.</p> <p>To clarify, the buildings that front the river would be expected to be set back from the river in accordance with para 5.37 Movement (bullet point 3).</p> <p>Agree that Paragraph 5.30 could be amended to remove reference to open space north of Cringle Dock (NE11).</p>

Proposed Change	<p>Amend Map 4.1 Strategy Area Map: Wandsworth Town as follows:</p> <p>Remove 'Proposed New Public Open Space' (Green shape) from WT9 Feather's Wharf.</p> <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p> <p>Amend Map 3.2 Site Allocation Map; Map 4.1 Spatial Area Map Wandsworth Town; and Map 4.8 Western Riverside Waste Transfer Station as follows:</p> <p>Updated boundary for WT11 Western Riverside Waste Transfer Station which includes the Household Waste and Recycling Centre</p> <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p> <p>Amend wording of para 4.100 as follows:</p> <p>'The site lies to the north of Smugglers Way adjacent to the bank of the River Thames. To the west of the site is Feathers Wharf <i>and to the east is the Waterside Path and Riverside East apartments a Household Waste Recycling Centre</i>. The site is used as a Waste Transfer Station <i>and as a household waste recycling centre</i>. The site is operated by the Western Riverside Waste Authority (WRWA) which is the statutory body responsible for the management of the waste delivered to it by the London boroughs of Wandsworth, Lambeth, Kensington and Chelsea and Hammersmith & Fulham. The site is used as a Waste Transfer Station <i>and as a household waste recycling centre</i> which utilises its riverside position and wharf facilities for bulk transportation of waste to an Energy from Waste Facility at Belvedere in the London Borough of Bexley. The current use of the site provides an important strategic role. Site Area <u>3.22-49ha</u>.'</p> <p>Amend wording to para 4.101 as follows:</p> <p>'<i>The majority of the site is designated as a safeguarded wharf, except for south-east corner</i>, with potential for residential led mixed-use development above including commercial/ business ... Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf <u>area</u>.'</p> <p>Amend wording to Para 5.29 (bullet point 2) as follows:</p> <p>"Para 5.29 Uses ... Development proposals should maximise the <i>development</i> potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transhipment of freight, waterborne freight handling use and freight-related activities. <i>Proposals should consider the feasibility of the comprehensive and combined development of both sites</i>. Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water."</p> <p>Amend wording to Para 5.30 as follows:</p> <p>'5.30 Open Space - Proposals to the north of the cluster <i>at</i> the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide <i>appropriate public</i> open space that connects to the proposed Nine Elms Pimlico Bridge <i>and the Thames Path and subject to the operation and maintenance requirements of</i> the Thames Tideway Tunnel access shaft. <i>Proposals</i> will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway</p>
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to the area that takes into account views to and from the bridge. *Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use.*

Amend the wording of PM3 People First (5) as follows:

'PM3 People First (5): the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded ~~safe-guarded~~ wharves.'

Consultee Full Name	Mr Mark Broxup
Consultee Organisation Details	General Manager Western Riverside Waste Authority
Agent Full Name	ms niamh burke
Agent Organisation Details	Carter Jonas
Comment ID	363
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	PM3 Nine Elms - Draft Local Plan Policy PM3 has undergone substantial rewording since the Regulation. 18 Local Plan consultation in February 2021. The WRWA support the removal of the reference to "the creation of green / open space that the Tideway Tunnel access shaft presents" from this policy. Part 5. of the policy states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves". We note a spelling mistake in the above paragraph which we have suggested a correction in our response to Question 7 (below). The WRWA supports the principle of the continuity of the Thames Path and supports the wording of the text relating to the protection of the safeguarded wharves and the service access to the waste transfer station.
Change(s) considered necessary	1. Feather's Wharf / Smugglers Way Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) - As set out in the response to Question 6, the WRWA propose that Paragraph 4.90 of the draft Plan, which states "the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and be a place with distinctive character and identity for the public to enjoy. Developments must include measures that contribute towards enhancement of the riverbanks", is deleted. The WRWA propose that site allocation WT11 should be extended to include the HWRC as well as the WRWTS which is currently included in the allocation. Furthermore, it is proposed that the Feather's Wharf cluster be amended by the Council to include the WRWTS and HWRC sites. 2. Kirtling Street Cluster; Site Allocation NE9 (Kirtling Wharf); and Site Allocation NE11 (Cringle Dock) - As set out in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves". We note there is a spelling mistake in 'safeguarded wharves' and therefore suggests this is corrected as set out below: As mentioned in the response to Question 6, Part 5. of Policy PM3 states that "the continuity of the Thames Path along the riverside is key to enhancing active travel

	and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded wharves".
Wishes to attend Hearing Session	
Reason why	The WRWA owns two waste transfer stations in the Borough, one at Cringle Dock, Battersea and the other at Smugglers Way, Wandsworth. Both of the sites are 'safeguarded wharves' within the current Wandsworth Development Plan and also within the draft Plan. The WRWA do not find the policies in the draft Plan relating to the two sites to be sound and therefore consider it necessary, as significant landowners in the Borough, to participate in the hearing sessions at the Examination in Public. We ask to be notified about future hearing sessions in due course.
Council Response	<p>Comment noted. The emphasis of the WT9 Feathers Wharf site allocation and the Wandle Delta SPD is on the provision of mixed-use development and open space. It is considered that an open space could come forward as part of the redevelopment of the site for mixed use in some form and ultimately viability will be assessed at the application stage. The Council consider that in terms of locating open space on the site there should be an emphasis that this is appropriate at the very north of the site and that the plan could be amended to clarify this.</p> <p>The area of Site Allocation WT11 is considered to be sound. However, it is recognised that there is merit in extending the boundary to the east to include the remainder of the Safeguarded Wharf designation and the HWRC land to assist the comprehensive redevelopment of the area should that be realised in the future.</p> <p>The existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is considered not to be coherent to this approach. Also, any potential redevelopment opportunity is still uncertain at this stage. However, it is considered that the proposed approach would not prevent a comprehensive redevelopment of WT11 Western Riverside Waste Transfer Station and the Feather's Wharf Cluster if that opportunity were to arise in accordance with the site allocations.</p> <p>We consider that the cluster approach would allow for the potential comprehensive redevelopment of the two sites including mixed-use development accounting for the continued operations of both wharves. The preferred approach is to keep these two sites separate as they are two separate wharves with different functions and their future development potential as one site is still somewhat uncertain. Para 5.29 of the Reg 19 Plan emphasises the development potential of both sites having regard to their safeguarded wharf status. However, it is acknowledged that the wording of the development considerations section could be strengthened to identify the opportunity for the redevelopment of both sites as one including additional waste capacity which could be addressed in para 5.29.</p> <p>A continuation of the Thames Path is sought to the northern part of Cringle Dock which will include public realm enhancements where possible. The northern side of Kirtling Wharf will require appropriate public open space as part of the Thames Tideway access shaft, the continuation of the Thames Path, and the landing point for the proposed Nine Elms Pimlico Bridge. It is proposed that wording be amended to clarify the exact location of the open space.</p>
Proposed Change	<p>Amend Map 4.1 Strategy Area Map: Wandsworth Town as follows:</p> <p>Remove 'Proposed New Public Open Space' (Green shape) from WT9 Feather's Wharf.</p> <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p> <p>Amend Map 3.2 Site Allocation Map; Map 4.1 Spatial Area Map Wandsworth Town; and Map 4.8 Western Riverside Waste Transfer Station as follows:</p> <p>Updated boundary for WT11 Western Riverside Waste Transfer Station which includes the Household Waste and Recycling Centre</p> <p>See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.</p>

Amend wording of para 4.100 as follows:

'The site lies to the north of Smugglers Way adjacent to the bank of the River Thames. To the west of the site is Feathers Wharf *and to the east is the Waterside Path and Riverside East apartments* a Household Waste Recycling Centre. The site is used as a Waste Transfer Station *and as a household waste recycling centre*. The site is operated by the Western Riverside Waste Authority (WRWA) which is the statutory body responsible for the management of the waste delivered to it by the London boroughs of Wandsworth, Lambeth, Kensington and Chelsea and Hammersmith & Fulham. The site is used as a Waste Transfer Station *and as a household waste recycling centre* which utilises its riverside position and wharf facilities for bulk transportation of waste to an Energy from Waste Facility at Belvedere in the London Borough of Bexley. The current use of the site provides an important strategic role. Site Area 3.22-49ha.'

Amend wording to para 4.101 as follows:

'*The majority of the site is designated as a safeguarded wharf, except for south-east corner*, with potential for residential led mixed-use development above including commercial/ business ... Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf area.'

Amend wording to Para 5.29 (bullet point 2) as follows:

"Para 5.29 Uses ... Development proposals should maximise the development potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transhipment of freight, waterborne freight handling use and freight-related activities. *Proposals should consider the feasibility of the comprehensive and combined development of both sites*. Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water."

Amend wording to Para 5.30 as follows:

'5.30 Open Space - Proposals to the north of the cluster at the Kirtling Wharf and Cringle Dock sites (NE9, NE11) will be required to provide appropriate public open space that connects to the proposed Nine Elms Pimlico Bridge *and the Thames Path and subject to the operation and maintenance requirements of* the Thames Tideway Tunnel access shaft. *Proposals* will need to consider the Nine Elms Pimlico Bridge structure, its future access and maintenance requirements, the users of the bridge, the river walk as well as providing a welcoming gateway to the area that takes into account views to and from the bridge. *Proposals will be required to comply with London Plan Policy S115 Water transport and open space should not conflict with the safeguarded wharf use*.'

Amend the wording of PM3 People First (5) as follows:

'PM3 People First (5): the continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safeguarded safe-guarded wharves.'

Consultee Full Name	DTZ Investment Management Limited
Consultee Organisation Details	DTZ Investment Management Limited
Agent Full Name	Emily

	Disken
Agent Organisation Details	Montagu Evans
Comment ID	364
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PUBLICATION' DRAFT LOCAL PLAN (REGULATION 19) CONSULTATION REPRESENTATIONS IN RESPECT OF SHOPSTOP AT CLAPHAM JUNCTION, 1-20 ST JOHN'S HILL, BATTERSEA, LONDON, SW11 1RU</p> <p>These representations are submitted by Montagu Evans LLP on behalf of our client, DTZ Investment Management Limited in respect of the site at ShopStop at Clapham Junction, 1-20 St John's Hill, Battersea, London, SW11 1RU ('the Site').</p> <p>We refer to the client as 'DTZIM' / 'the Client' in the remainder of this letter. Representations were made on behalf of the Client in respect of the consultation exercise on the draft Regulation 18 Local Plan in March 2021. We attach a copy of these representations at Appendix 1 for reference.</p> <p>These representations are submitted on behalf of the Client in respect of the current consultation exercise on the Local Plan Publication (Regulation 19) Version as they wish to maintain their position as an interested stakeholder in the redevelopment of Clapham Junction.</p> <p>BACKGROUND AND CONTEXT TO THESE REPRESENTATIONS</p> <p>These representations relate to the Site which is located in Clapham Junction Town Centre but also consider more broadly the future of the wider Clapham Junction Town centre area.</p> <p>The Client's involvement in the Site dates back to November 2018, when the Client purchased the Site on behalf of Strathclyde Pension Fund. A red line site plan is enclosed at Appendix 1 illustrating the extent of the Client's ownership. A five storey office building occupied by the PCS Union ('the PCS Building') is adjacent to the eastern boundary of the Site but sits outside of the Client's ownership.</p> <p>The Site as existing comprises of part two, part three, part four storey buildings, providing retail, leisure, and office accommodation. The retail accommodation is split into 19 units, a number of which front on to St John's Hill. The remainder are accessed via the main shopping centre and retail entrances from St John's Hill. A gym is provided at first floor level with a separate access from the junction of St John's Hill and Prested Road. The office accommodation sits above the retail area, and is arranged over three floors. The Junction Public House is located within the western boundary of the Site.</p>

The existing commercial accommodation on the Site benefits from high occupancy rates. The main shopping centre trades well, as a result of high pedestrian footfalls generated by those walking through the shopping centre to and from Clapham Junction Rail Station. However, the poor and outdated design of the commercial accommodation means that it no longer meets contemporary retail requirements or serves the community need expected of such a prominent site within the town centre.

The Site also comprises the main entrance and ticket office of Clapham Junction Station, which is owned by Network Rail and is accessed through the shopping centre from St. John's Hill. This entrance gives direct access to the pedestrian tunnel which runs beneath the platforms. Clapham Junction Station constitutes a major transport hub on the Wessex Route of the national rail network and, with approximately 2,000 train movements a day, is the busiest interchange station in Europe.

Prior to the onset of the COVID-19 pandemic, the station suffered from congestion and overcrowding, exacerbated by the doubling of passenger numbers in the last 10 years. There is a clear incentive to redevelop the Site, to bring forward much needed improvements to the station to address pedestrian capacity issues alongside other key benefits including the provision of high-quality public realm, active retail frontages and a building of civic quality befitting of its location as gateway to the largest rail station in the Borough.

Since October 2019, a series of meetings have been held between the Client team (managed by the Development Manager, Sovereign Centros) and Network Rail to ensure that any future development on the Site does not prejudice Network Rail's long-term plans to deliver improvements to the station.

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

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	DTZ Investment Management Limited
Consultee Organisation Details	DTZ Investment Management Limited
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	365
Title	PM 4 Clapham Junction and York Road/ Winstanley Regeneration Area
Number	Policy 5
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>AREA STRATEGY FOR CLAPHAM JUNCTION AND YORK ROAD / WINSTANLEY REGENERATION AREA</p> <p>The Publication Draft Local Plan defines the boundary of the Clapham Junction Opportunity Area ('OA') to identify the areas with the greatest potential of change over the plan period. Our Client supports the inclusion of the Site within the OA boundary, and the recognition of the potential to deliver new homes and jobs in the earlier phases.</p> <p>EMERGING POLICY PM4: CLAPHAM JUNCTION AND YORK ROAD/WINSTANLEY REGENERATION AREA Emerging Policy PM4 provides guidance on how sustainable development will be delivered within the Clapham Junction and York/Winstanley Regeneration Area with a focus on Place-making, Smart Growth and People First.</p> <p>Part A. 3 of the emerging Policy PM4 explains that the Council will work in collaboration with Network Rail, TfL, the local community and other stakeholders to prepare the Urban Heart Masterplan for Clapham Junction, comprising Clapham Junction Station and adjoining Site Allocations to improve its role as a major rail and public transport interchange, and unlock capacity for new homes and jobs and to better integrate it with the wider Town Centre and the York Road/Winstanley Regeneration Area.</p> <p>The Site acts as a gateway to the largest rail station in the Borough and occupies a prominent position within Clapham Junction Town Centre, and therefore on behalf of our Client we welcome the inclusion of the Site within the proposed Urban Heart masterplan boundary to help unlock capacity for growth. Our Client has already undertaken regular engagement with Network Rail and other key stakeholders since 2019 and is keen to continue to take a collaborative approach to help facilitate the preparation of the masterplan.</p> <p>Part A, Point 9 of emerging Policy PM4 states that:</p> <p><i>"Development must be sensitive to local character by maintaining and respecting the proportions, scale and coherence of existing terraced streets, shop frontages and listed buildings and their settings."</i> (our emphasis added).</p> <p>On behalf of our Client, we are of the view that this proposed policy wording has the potential to overly constrain new development which should instead be encouraged to seek to optimise the use of previously developed land and find sensitive ways to respond to existing character. We therefore suggest that this part of Policy PM4 is re-worded. Our additional wording is set out in red below:</p> <p><i>"Development must be sensitive to local character by maintaining having regard to and respecting being respectful of the proportions, scale and coherence of existing terraced streets, shop frontages and listed buildings and their settings."</i></p> <p>Part B of Policy PM4 (Clapham Junction and York Road / Winstanley Regeneration Area) relates to inclusive growth and outlines that development within Clapham Junction and York Road/Winstanley Regeneration Area has capacity to provide 2,995 homes by 2032/2033, over the first 10 years of the Plan period. In line with the growth objective of the Clapham Junction OA, we are of the view that these figures should be stated as a minimum which the Council should seek to exceed in order to ensure that housing growth is accommodated in areas with the greatest public transport connectivity and capacity in the Borough. Our Client also seeks clarification to be provided within the policy wording as to whether the 2,995 figure will exclude the up to 2,550 homes to be delivered as part of the approved masterplan for the Winstanley and York Road regeneration (ref. 2019/0024).</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The existing wording is considered sufficiently flexible and clear.
Proposed Change	No change considered necessary.
Consultee Full Name	DTZ Investment Management Limited
Consultee Organisation Details	DTZ Investment Management Limited
Agent Full Name	Emily

	Diskan
Agent Organisation Details	Montagu Evans
Comment ID	366
Title	CJ2 Clapham Junction Station Approach, SW11
Number	Statement 37
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>SITE ALLOCATION CJ2 (CLAPHAM JUNCTION STATION APPROACH, SW11)</p> <p>The Site is allocated within the 'Publication' Draft Local Plan under emerging site allocation CJ2 (Clapham Junction Station Approach, SW11). Our Client continues to support the allocation including our Client's site and the PCS Building, which sits outside of the Client's ownership, and welcomes the revision to the site allocation boundary to incorporate the Junction Public House.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No changes considered necessary.

Consultee Full Name	DTZ Investment Management Limited
Consultee Organisation Details	DTZ Investment Management Limited
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	367
Title	LP16 Public Houses and Bars
Number	Policy 27
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>EMERGING POLICY LP16: PUBLIC HOUSES AND BARS</p> <p>Emerging Policy LP16 resists the loss of public houses and bars and seeks to protect public houses and bars of historic or architectural interest and/or community value from demolition and/or change of use.</p> <p>It is stated at Part B of the Policy that:</p> <p>1 <i>Proposals involving the loss of public houses and bars must demonstrate that:</i></p> <p>1 <i>1. no historic or architectural interest would be lost; and</i></p> <p>1 <i>2. the public house/bar has no community value and is not viable as a pub/bar or that it could not be used for another social or community use by requiring a full and proper marketing exercise for a period of at least 24 months in line with the requirements set out at Appendix 1 of this Plan.</i></p> <p>Though our Client concurs with the current thrust of emerging Policy LP16 in that the absolute loss of pubs across the Borough would be unacceptable, we would propose that the policy is amended to allow for re-provision of new high-quality replacement public houses within major regeneration sites where wider regeneration benefits can be demonstrated. In light of this, we would suggest that additional Part C within Policy LP16 as follows:</p>

	<i>"C. Where public houses fall within major regeneration sites allocated for comprehensive redevelopment within the Local Plan, the loss of public houses may be considered acceptable provided that the public house use is re- provided as part of any new scheme."</i>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is considered that the suggested change would undermine the policy. In this circumstance the merits of the proposal would be assessed in accordance with policy LP16 and the rest of the Plan and a planning decision would be made in accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004 if necessary.
Proposed Change	No change considered necessary.
Consultee Full Name	DTZ Investment Management Limited
Consultee Organisation Details	DTZ Investment Management Limited
Agent Full Name	Emily Disken
Agent Organisation Details	Montagu Evans
Comment ID	368
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>EMERGING POLICY LP4: TALL BUILDINGS AND THE COUNCIL'S URBAN DESIGN STUDY</p> <p><i>Approach to Tall Buildings</i></p> <p>Part of the Site is identified within Appendix 2 of the draft Publication Local Plan as falling within Tall Building Zone TB-B5-01, where the existing prevailing height is defined as 2-8 storeys, and appropriate heights for development defined as 7-15 storeys (21-45m).</p>

Part D of emerging Policy LP4 states that:

“Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.”

On behalf of our Client, we are of the view that this wording provides an overly prescriptive approach to the consideration of tall buildings. Applying such constraints in those areas of the borough identified for substantial growth over the plan period and beyond is likely to be harmful to meeting the Plan’s proposed objectives in particularly those of the opportunity area designations. This is because it fails to recognise that to achieve the desired growth envisaged by the Plan and meet housing targets, it will be necessary to permit buildings which are taller than their existing context. The location of the greatest density within the Borough should take into account both social and economic reasons alongside design considerations.

We note that over recent years permissions have been granted for substantially taller buildings in many parts of the borough including Battersea/Nine Elms, Wandsworth Town Centre and Lombard Road which exceed the maximum height permitted within any proposed tall building zone. It follows that further tall buildings in excess of 25 storeys in the borough are likely to be appropriate and this should be acknowledged and the potential growth directed to those locations where it will assist in achieving the Plan’s wider objectives.

In granting these consents, judgments were made as to the acceptability of tall buildings and high-density development based upon a range of factors, not just townscape considerations as suggested by the draft policy. Therefore, in our view, emerging Policy LP4 needs to provide positive guidance to landowners and developers on how other factors beyond just pre-existing townscape context will help to inform the acceptable massing of schemes in the areas where the greatest growth is expected and the role that masterplans can have in this consideration.

The plan includes some acknowledgment at supporting Para 14.26 of the Publication Local Plan where it states that *“height is not the only one consideration when assessing the acceptability of a planning application and whether it is of high-quality design and makes a positive contribution within its context”*. However, on behalf of our Client we suggest a revised policy wording which makes explicit reference to the relevant other factors to the consideration of tall buildings including ensuring that developments can viably deliver the identified public benefits that the draft plan seeks.

The revised policy wording should acknowledge the significant role of masterplans in establishing appropriate massing on relevant sites defined by the Council, particularly those in growth areas such as OAs. The limitations of relying solely on the Council’s Urban Design Study to make a judgement on appropriate heights within the Borough should be stated within the Policy.

Approach to Mid-rise Buildings

Part of the Site fronting St John’s Road is located within ‘Mid-rise Building Zone MB-B5-02’, with appropriate heights for development defined as 6 storeys (18m). Part H. of Emerging Policy LP4 states that: *“Proposals for mid-rise buildings should not exceed the appropriate height identified within the relevant mid-rise building zones as identified at Appendix 2 of this Plan.”*

On behalf of our Client, we re-iterate the comments made in relation to the approach to tall buildings above, in that the emerging policy should make explicit reference to the planning balance for a sounder approach to the acceptability of mid- rise buildings.

Emerging Policy LP4 goes on to state that:

"F. Proposals for mid-rise buildings will be supported in tall and mid-rise building zones identified at Appendix 2, where the development would:

- 1. be located and designed in order to create a step down between the proposed development and buildings within the surrounding area;*
- 2. respond appropriately in height, scale and massing to existing buildings in the surrounding area, and protect or enhance heritage assets, including their settings;*
- 3. respect the scale, width and proportion of adjacent buildings, streets and watercourses, and local character, and avoid adverse effects on key characteristics, valued features and sensitivities as identified in the relevant character area profile set out in the Council's Urban Design Study (2021); and*
- 4. provide a varied and interesting roofline, respond to surrounding architectural styles, avoid the creation of long homogeneous blocks of development and create active frontages at ground floor level.*

- 1 G. Proposals for mid-rise buildings will not be permitted outside the identified tall and mid-rise building zones."*

On behalf of our Client, we note that emerging Policy LP4 has become more restrictive since the 'Pre-Publication' (Regulation 18) version of the Plan was published. Our client considers that this new addition to the tall building controls should again include recognition especially in relation to Part H that there will be some sites where a more flexible approach will be required to ensure that appropriate development that achieves the wider objectives of the plan can be supported.

SUMMARY

These representations are submitted on behalf of DTZIM in respect of ShopStop at Clapham Junction, 1-20 St John's Hill, Battersea, London, SW11 1RU which is located in Clapham Junction Town Centre ('the Site'). DTZIM are currently exploring options to redevelop the Site.

DTZIM have requested that we make representations on the 'Publication' Draft Local Plan to assist with assessing the development potential of the Site and to ensure its development is consistent with the vision and objectives of the Area Spatial Strategy for Clapham Junction and the growth envisaged by the Opportunity Area.

On behalf of our Client, we welcome the greater recognition of the OA designation within the Publication Draft Plan and support the Site's inclusion within the defined OA boundary. Our Client also welcomes the emphasis within the Plan of the master-planning exercise in setting out a clear strategy for accommodating the growth envisaged by the OA designation. DTZIM are keen to continue to work collaboratively with Network Rail and other key stakeholders to facilitate the master-planning process and support the inclusion of the Site within the Urban Heart Masterplan boundary.

However, the principle points in respect of these representations are in respect of the approach to tall buildings which our Client notes has become more restrictive following the Regulation 18 consultation. As outlined in our previous representations, the Plan should make clear that it seeks a planning balance that examines the potential for townscape harm set beside other significant benefits that a development might offer, and also take into account the visions for areas and key planning objectives and direct development where it will assist in delivering these objectives.

The Plan should provide sensible criteria to assess the acceptability of tall buildings, and acknowledge the significant role of masterplans in establishing appropriate massing on relevant sites defined by the Council if the growth envisaged by the Plan and OA designations is to be achieved.

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

012 424) in the first instance.

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	369
Title	Paragraph
Number	3.4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	3.4. We do not accept the claim (repeated at 3.20) that the process of developing the area strategies 'has been informed by also been informed by community engagement to ensure that the classification reflects those 'Places' recognised by local people'. We are not aware of any such engagement beyond a consultation in 2020 on an Urban Design Study undertaken by Arup.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	The development of this Local Plan has been informed by three public consultations: one undertaken between December 2018 and February 2019 on a Local Plan issues scoping document, one undertaken between January and March 2021 on an earlier draft of the Local Plan (Regulation 18 version) and the Regulation 19 submission version in January to February 2022. The Statement of Consultation 2022 details the publicity and engagement undertaken at each stage.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	370
Title	Paragraph
Number	3.7
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>3.7. We presume that the reference to the Policies Map for each area strategy is intended to refer to what are in each of the area strategies termed 'Spatial Area Maps'. We note that these maps do not include information of the kind indicated in other parts of the Plan which refer to the Policies Map (see our earlier comment on Chapter 2). The qualification that the indicative areas on the Policies Map (sic) for each area strategy should be understood in general terms rather than defining precise boundaries is important, especially in relation to Clapham Junction, with its oddly-defined boundaries for the town centre, and then the much larger area indicated for the nascent Opportunity Area. However, the statement is in tension with the first sentence of 3.21: "The boundaries for the Area Strategies have been drawn to ensure that these areas of planning focus are functionally and visually integrated".</p> <p>We note also that the 'spatial strategy area linkages' shown on Map 2.1 Key Diagram, which seem to show linkages between, for example, Clapham Junction and Nine Elms, are nowhere explained or even referenced in the rest of the Plan. If the linkages exist, or are intended to do so, they must be explained.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Policies map shows the indicative boundaries for each Area Strategy Area. These are also contained in the Area Strategy maps (Spatial Area Maps) within the Plan. The policy text of each placemaking policy i.e PM2-PM10 corresponds to the area within the indicative Area Strategy boundaries albeit as stated in paragraph 3.7: '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.'</p> <p>The Spatial Strategy Area Linkages shown on Map 2.2 Key Diagram are illustrative only and intended to show how each area strategy relates to one another as set out within each area strategy placemaking policy. These linkages are intended to show illustrative general planning connections such as the development of Cycle Superhighway 7 between Balham and</p>

	<p>Tooting - to show that each area is not to be developed in isolation of the other areas, as mentioned in paragraph 3.7. The Overarching Spatial Area are to read in conjunction with the individual Spatial Areas they cross over with.</p> <p>It is not considered that paragraph 3.7 and 3.21 are in conflict. It is expected that there will be a visual and planning consistency within each spatial area but the boundary is illustrative.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	371
Title	Place Approach Themes and Principles
Number	Table 3.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Table 3.1. The fourteen themes and principles set out here seem to relate to issues discussed in Chapter 2 paragraphs 2.59-102; but it is unfortunate that this link is nowhere made explicit, and in some cases ('built identity' 'economic development') they are expressed differently. And as we noted in our comments on Chapter 2, there appears to be no relationship at all with the eighteen elements of the Vision for 2038 (text box following para 2.58) or the then following list of 25 environmental, social and economic objectives. Despite the prominence given to several issues in those lists, there's nothing here, for example, about distinctive neighbourhoods, or about social integration, or reducing barriers and social inequalities, or about public services and their location, or about employment and the need for affordable and flexible employment spaces. There are many other examples.</p> <p>Even more worryingly, in the area strategies in Chapters 5-12 which follow, we find that many of the key principles set out here are not referenced at all.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Local Plan should be read as whole and therefore duplicating and referencing the plan throughout is not considered necessary.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	372

Title	Paragraph
Number	3.28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	3.28. This largely repeats what's already been said (paragraph 3.12; Policy PM1 B and C; and paragraph 3.27).
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The background text to the policy is considered necessary.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	373
Title	Paragraph
Number	3.26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	3.26. The statement that proposals that do not meet the fourteen principles (themes?) will not be supported raises the question of why the assessment of proposals will not include reference to the significantly different list of 25 environmental, social and economic objectives set out as part of the spatial vision in Chapter 2. If not, what is the intended status of those objectives?

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The objectives set out in the Local Plan have been used in compiling Vision and place-based policy framework
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	374
Title	Area Strategy for Nine Elms
Number	5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Chapter 5. Area Strategy for Nine Elms We believe that several aspects of this Strategy - including travel, transport and permeability; the balance between density and liveability; and the provision of affordable housing – do not meet the needs of the population of Nine Elms and its neighbouring areas, which will grow rapidly during the currency of the Plan. Nor does it take proper account of some recent developments within the area.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The plan is considered to be sound and is based on a robust and credible evidence base.
Proposed Change	No changes considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	375
Title	Paragraph
Number	5.6
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	5.6. It is curious to note in a Plan that will come into force in 2023 that the Embassy Quarter Heating Network (EQHN) will start to provide low carbon heating to new developments by 2021.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. A District Heat Network was installed in May 2021 to connect buildings in Embassy Gardens and The Residence to the energy centre at the US Embassy.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	376
Title	Paragraph
Number	5.8

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	5.8. The statement that Apple are expected to move into Battersea Power Station in 2021 has been overtaken by events. The move is now expected in 2022, before the Plan comes into force.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is proposed to update the year as suggested.
Proposed Change	Amend wording in paragraph 5.8 as follows: 'Apple announced their intention to make Battersea Power Station their new London campus and are expected to move in 20212.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	377
Title	Paragraph
Number	5.9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	5.9 and 5.11. These paragraphs fail fully to acknowledge Policy E5 in the London Plan which requires the Council to explore opportunities to intensify and make more efficient use of land in Strategic Industrial Locations (SILs). They also fail to recognise that the Queenstown Road Battersea SIL includes Parkfield Industrial Estate. Although it lies outside the Opportunity Area, we believe that the estate, which is located between railway lines with arches, and has highly constrained access, merits inclusion either here or in Chapter 13 as a site allocation, with specific guidance about suitable industrial activity in the area.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Parkfield Industrial Estate is identified as being part of the Queenstown Road, Battersea Strategic Industrial Location (SIL) in paragraph 5.9.</p> <p>The policy approach for SIL is set out in LP34 Managing Land for Industry and Distribution. This sets out permissible uses in part A. Part B.3. states that "the intensification of sites for industrial purposes through increased floorspace will be strongly encouraged". Paragraph 18.28 explicates this, noting "this could be achieved through the introduction of smaller units; the development of multi-storey schemes; the addition of basements; and the more efficient use of land through higher plot ratios". The designation of this land as SIL is considered to provide an appropriate spatial planning framework, and the allocation of the wider site is not necessary.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	378
Title	Paragraph
Number	5.13
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	5.13. The statement that the PTAL rating for the area will improve following the opening of the Northern Line extension should surely be in the past tense; and a revised PTAL rating should be provided. On the other hand, it is unsatisfactory that there is no reference to bus routes through Nine Elms, the importance of Vauxhall Bus Station as an entry point, or to any concern about capacity as development is completed. There is only one bus route (344) which runs from Vauxhall along the whole length of Battersea Park Road, and no direct route at all to the York Road area. Moreover, while the increase in provision for cyclists mentioned here is welcome, it is unsatisfactory that there is no parallel specification of better provision for pedestrians. Indeed, there is no recognition of concerns that in many parts of the area, including the linear park, pedestrians and cyclists are likely to come increasingly into conflict with each other.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The PTAL is expected to continue to change and increase as the frequency of trains at Battersea Power Station continues to increase over the plan period.</p> <p>Paragraph 5.15 references that the Council is funding a TfL scheme which provides a consistent and coherent design approach along the whole Nine Elms Lane corridor, making improvements for pedestrians, cyclists and bus users.</p> <p>Vauxhall Bus Station is outside the borough and would be inappropriate to reference.</p> <p>Improvements to the transport infrastructure will require careful design to prevent conflict between cyclists and pedestrians.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	379
Title	Paragraph
Number	5.17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	5.17. We have strong reservations about these placemaking scores, which we do not believe reflect those of the increasing number of residents or those working/using facilities in Nine Elms. The area has changed so much since the Placemaking exercise was undertaken, and the methodology may not be suitable for a rapidly developing and populating OA such as this.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The placemaking scoring exercise was used, alongside the evidence base to inform the development of each area strategy.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	380
Title	Creative Clusters
Number	Map 5.1

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Map 5.1 Creative Clusters</i> We are puzzled by the purpose of this map, for which there is no supporting text and which has no equivalent in any of the other area strategies. The categorisation of some sites – including the temporary Flower Market and Arch 42 - as 'cultural uses' overstates the provision for creative and cultural uses.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	PM3(C)1 sets out the purpose of the Creative Clusters.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	381
Title	Paragraph
Number	5.19
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	5.19. It is unsatisfactory that the seven elements in the vision make no mention of traffic management or of public transport connectivity, despite these being the first of the Plan's Placemaking principles.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Public transport is captured under the aim of creating mixed-use neighbourhoods for Nine Elms. The Council is also funding a TfL scheme which provides a consistent and coherent design approach along the whole Nine Elms Lane corridor, making improvements for pedestrians, cyclists and bus users.
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	382
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy PM3 Nine Elms</i></p> <p><i>Placemaking.</i> There are no policies here relating to two of the placemaking principles: traffic management; and built resilience including digital connectivity</p> <p><i>Placemaking 4a.</i> The requirement that developments should protect and enhance views of Battersea Power Station has, from any viewpoints other than the north, not been respected in recent consented schemes including those at the former gasworks site and at Palmerston Court. For most of the residents of Battersea the Power Station and its chimneys are becoming increasingly invisible, since measures to ensure visibility from the north have not been matched by similar measures to east, west and south.</p> <p><i>Inclusive Growth 1.</i> It is unsatisfactory that nothing is said here about the principle of sustainable housing, or its reference to the environmental, social and economic objectives set out in Chapter 2, including crucial matters such the forms of housing tenure, or affordable housing.</p> <p><i>Inclusive Growth 2.</i> The circular reference here to developments on estates that must be 'subject to the policies of the Local Plan' makes no sense.</p> <p><i>Inclusive Growth 6 and 7.</i> These policies fail fully to meet the commitment in Policy SDS1 E3 that the Council will seek a net increase in the provision of industrial floor space. The same can be said of the suggestions of mixed development in the following site allocations, some of which, such as the Kirtling Street Cluster and NE2, could result in a significant net loss of floor space.</p> <p><i>Inclusive Growth 11.</i> While we welcome this policy, we note that despite the reference to LP49, there is no mention of urban logistics hubs in Chapter 20 on sustainable as a more general objective for wider areas of the borough, or emphasised as something which will be actively pursued and required for development in local employments area.</p> <p><i>People First.</i> There are no policies here relating to the people first principles of accessible day-to-day facilities; or lifestyle choices..</p>

	<p><i>People First 6.</i> This policy fails adequately to meet the principle of promoting ease of movement and active travel across the area, especially throughout the disconnected sections of the BDTQ. There should be a requirement to take forward the suggested feasibility studies set out in the BDTQ Economic Appraisal and Design Framework (p 37) to provide direct links through railway arches and, where appropriate, over the rail lines. The delays and uncertainties (not acknowledged here) about the timescale for the scheme to make Nine Elms Lane and Battersea Park Road more people-friendly are unacceptable. So too is the failure to mention here (or anywhere in this chapter) the proposals to modify Ponton Road set out in the Infrastructure Delivery Plan (IDP).</p> <p><i>People First 7, 8 and 10.</i> There is a need to improve accessibility to Battersea Park and Queenstown Road Stations not just externally but also within the stations themselves. The delays and uncertainties about these schemes (again not acknowledged here but in the IDP) are unacceptable.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Inclusive Growth 1 - the plan should be read as a whole. Issues of sustainable and affordable housing are dealt with in other parts of the plan.</p> <p>Inclusive Growth 2 - the criterion ensures, for the avoidance of doubt, that policies apply to the Council's own house-building programme.</p> <p>Inclusive Growth 6 and 7 - These policies relate to the designated Strategic Industrial Location at Queenstown Road, Battersea. The loss of industrial land is not permitted in this location, and indeed, within the BDTQ area, redevelopment proposals must deliver intensified industrial floorspace (see part 6.c). A number of site allocations within Nine Elms have already been de-designated as industrial land as part of the long-term strategic regeneration of the area (set out in the VMEB Opportunity Area Planning Framework, 2012). These no longer form the designated industrial or economic areas identified in SDS1.E.3.</p> <p>Inclusive Growth 11 - LP49 Sustainable Transport and its supporting text include specific reference to urban logistics hubs.</p> <p>People First 6 - placemaking, including improvements to walking and cycle access within the BDTQ area, are included as part of Placemaking 2 (PM3.A.2), which refers to the BDTQ EADF.</p> <p>PM3 C (1) and (3) is considered to address improvement of lifestyle choices and promotion of day to day facilities.</p> <p>People First 7, 8 and 10 - The IDP is to be read in conjunction with the Local Plan and the projects referenced there will be developed in line with the policies prepared in this plan.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	383
Title	NE1 Cable and Wireless, Ballymore Site 6, Unit 2a, Battersea Park Road, SW8
Number	Statement 23
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Kirtling Street Cluster.</i></p> <ul style="list-style-type: none"> • 27 See our comment about mixed use development and the potential loss of industrial land under Inclusive Growth policies 6 and 7. • 27 and 5.36. The references in 5.27 to residential use and in 5.36 to developments above the waste transfer station might suggest that housing might be built in that location. We have grave doubts as to whether that would be acceptable. • 31. It is unacceptable that the proposals for modifying the junctions with Nine Elms Lane focus almost wholly on the needs of commercial vehicles. The reference to Kirtling Street should properly be to Pump House Lane. • 37. It is not clear why the policies on movement in paragraph 5.37 do not include the requirements relating to public transport on Nine Elms Lane that are set in other site allocations (see for example the requirements for site allocation NE2, paragraph 5.47).
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Residential development at this site is considered possible.</p> <p>Maintaining the wharves functions is important for the continued sustainable management of waste in the borough and will be protected.</p> <p>Due to an administrative error it is considered that paragraph 5.31 could be updated to reflect the correct street name.</p> <p>Paragraph 5.33 specifically sets out the public transport requirements for this cluster.</p>
Proposed Change	<p>Amend wording in paragraph 5.31 as follows:</p> <p>5.31 Access - Any improvements to the Kirtling Street <u>Pump House Lane</u> or Cringle Street junction with Nine Elms Lane (NE1, NE3) should maintain appropriate highway access for commercial vehicles to the safeguarded wharves.</p>

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	384
Title	NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8
Number	Statement 28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.</i></p> <ul style="list-style-type: none"> • 43. See our comment about mixed use development and the potential loss of industrial land under Inclusive Growth policies 6 and 7. • 43. The proposed requirement for a boulevard pleasant for all users and providing links further north has not been consolidated with the proposals for junction improvements in 5.31. Nor is it compatible with what is said at paragraph 5.49. • 53. This paragraph is confused. The reference to the north-east of the site should presumably be to the north-west; and the reference to the Park Side neighbourhood should be to the Nine Elms Park development. We do not understand the reference to 'the Thessaly area to the west and to the Thessaly neighbourhood'.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The Council considers it to be possible for the boulevard referenced in the site allocation to be designed in a way that is compatible with junction improvements to the north and Covent Garden Market and the police station to the south.</p> <p>Paragraph 5.53 is considered clear and consistent with the wider plans for the Nine Elms Spatial Area.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	

Comment ID	385
Title	NE4 Metropolitan Police Warehouse Garage, Ponton Road, SW8
Number	Statement 29
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>NE4 Metropolitan Police Warehouse Garage, Ponton Road</i></p> <ul style="list-style-type: none"> • This site has a long history as a site allocation. See our comments on delivery at paragraph 22.13. • 57 and 5.58. See our comment about mixed use development and the potential loss of industrial land under Inclusive Growth policies 6 and 7.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Responses are set out to the specific comments identified separately.
Proposed Change	No change required.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	386
Title	NE6 Havelock Terrace, SW8
Number	Statement 30
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Battersea Design and Technology Quarter</i></p> <ul style="list-style-type: none"> • 64. Development of a Masterplan must not be left to landowners and developers, but should involve full community engagement in line with the requirements of the NPPF and NMDC. • 72. The proposal to 'reduce potential conflict between vehicles, pedestrians and cyclists at the junction with Queenstown Road' is wholly unclear, since there is no junction from the Silverthorne Road site direct to Queenstown Road. • 74. The reference to the NLE station 'currently expected to open in Autumn 2021' is otiose. • 77. The statement that Havelock Terrace is opposite the NLE station at Battersea Power Station is false. Rather, it is opposite the Dogs Home, more than 200 metres from the current station entrance, and 100 metres from any future western entrance.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The Council will conduct all necessary consultation as part of any masterplanning approach.</p> <p>The north west corner of the Silverthorne site is adjacent to the junction between Silverthorne Road and Queenstown Road and could create space to ensure safe and easy vehicle movements at this junction.</p> <p>The date of completion of the Northern Line extension was not updated after the Regulation 18 Consultation due to an administrative error and it is proposed that they could be amended.</p> <p>With the anticipated opening of the second western entrance to the underground station Havelock Terrace will face the station.</p>
Proposed Change	<p>Amend wording in paragraph 5.74 as follows</p> <p>'5.74 Active Travel - Contributions to upgrade pedestrian routes to/from Battersea Park Station and Queenstown Road Station and improve accessibility to the new Northern Line station at Battersea Power Station, currently expected to open in Autumn 2021 will be required.</p>

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	387
Title	NE12 New Covent Garden Market (NCGM), SW8
Number	Statement 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>NE12 New Covent Garden Market</i></p> <ul style="list-style-type: none"> • 5.92. The proposed active travel link to Ponton Road can be achieved only if the proposed cycle (and pedestrian?) route in NE4 (paragraph 5.59) is provided. And the link to Ascalon Street can be achieved only if the links in NE2 (paragraph 5.48) as well as NE4 are provided. • 5.95. See our comments on paragraph 5.53. In order to avoid confusion, the same language should be used in both paragraphs. • 5.97. See our comments on paragraph 5.43. • 5.125. The reference to 'strong east-west pedestrian and cycle connections with the wider Nine Elms area to the north' is at best confusing.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Paragraph 5.53 is considered clear and consistent with the wider plans for the Nine Elms Spatial Area.</p> <p>The Council considers it to be possible for the boulevard referenced in the site allocation to be designed in a way that is compatible with junction improvements to the north and Covent Garden Market and the police station to the south.</p> <p>Paragraph 5.125 is considered clear in requiring greater permeability between the site and the part of the spatial area to the north of the trainline.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	

Agent Organisation Details	
Comment ID	388
Title	NE13 Battersea Park Road (between Stewarts Road and Thessaly Road), SW8
Number	Statement 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>NE13 Battersea Park Road (between Stewarts Road and Thessaly Road)</i> The inclusion of this site is very difficult to understand. Very little is said about it, and it is already heavily built up, mainly with social housing owned by the Council. Further justification is needed for identifying this area as a potential future development site, given its current settled residential character and the listed pub building.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. This site forms part of the Councils 'Homes for all project' which aims to deliver 1000 homes. A reference to this is contained in PM3 B. 2 - 'Development proposals as part of the Council's 'Housing for All' project which aims to deliver 1000 homes to buy or rent, will be supported within the Savona, Patmore and Carey Gardens Estates subject to the policies of the Local Plan. Development will be expected to provide new homes, and community and play facilities, and improve accessibility to and within the estates.'
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	389
Title	Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area
Number	6

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 6. Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area.</p> <p>While we welcome the new commitment to develop a masterplan for a core part of the area, there are several aspects of the strategy that we believe are unsound.</p> <ul style="list-style-type: none"> • There is no discussion of whether or how the vision or the strategy might be delivered during the Plan period. • Some of what is said about the area is simply wrong, mistaken, inconsistent or confusing • There is no reference to the town centre's designation in the London Plan as a centre of regional importance for the night-time economy. • We are disturbed by the implication that work has already started on the masterplan for the area around the station, in contradiction of the requirements of the NPPF and NMDC that community engagement should be a central part of all stages of the process, from scoping and analysis onwards.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The vision and strategy will be brought forward through developments and will be important considerations when proposals are assessed. The masterplanning process for the area is in its infancy and public engagement will take place over the course of the work.</p> <p>Paragraph's 6.3 references Clapham Junction's classification as NT2; PM4 (B)4 also sets out the importance of the night time economy uses in town centres.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	390
Title	Paragraph
Number	6.2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.2. The statement that 'There is a good selection of comparison and convenience shopping, with several high-quality 'national multiple' retailers' is mistaken. There are currently (January 2022) nine national multiples on St John's Road (other than food shops); three in the main entrance to the station; two on Northcote Road; and none on the other streets.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	This statement was based on the Retail Needs Assessment (2020) and the Town Centre Health Checks which informed it. At the time, 12 national multiple retailers were identified, which the study noted was 'reasonable and reflects Clapham Junction's size and role'. The statement is considered to remain applicable.
Proposed Change	No changes considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	391
Title	Paragraph
Number	6.4
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.4. The reference to an office building at 7-11 St John's Hill is false. The upper floors, above Barclay's Bank and two shops on the ground floor, were converted into flats in 2017, following planning consent granted by the Council. Moreover, substantial parts of PCS House are used for other than office purposes.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is suggested that reference to 7-11 St John's Hill is removed.
Proposed Change	Amend paragraph 6.4 as follows: "Given the retail and leisure focus of Clapham Junction, there is currently limited office provision within the centre, except for PCS House and the 7-11 St John's Hill building, as well as some smaller offices on Lavender Hill. "
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	392

Title	Paragraph
Number	6.3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.3. The reference to artists' studios on Lavender Hill, many of which are located in the Battersea Business Centre is misleading, since the Centre is a considerable distance from the town centre and indeed beyond the are covered by the Spatial Area Map 6.1.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is suggested that this text is removed.
Proposed Change	Amend paragraph 6.3 as follows: "...The area also hosts a number of cultural organisations and large venues, notably the Battersea Arts Centre and the Clapham Grand, and is also renowned for its artists' studios on Lavendar Hill, many of which are located in the Battersea Business Centre. Due to its excellent..."
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	393
Title	Paragraph
Number	6.8
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.8. The claims that the approved Masterplan for the York Road/Winstanley Regeneration Area includes measures to ensure that the area is well connected to Clapham Junction, that local people can access the station and town centre by foot or by cycle, and that it focuses on integration of the area with the area to the south of the railway are at the best misleading. The Master Plan includes no measures at all to improve access to the town centre.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. PM4 contains a number of placemaking criteria to improve connectivity and access which is supported by the vision for Clapham Junction. The York Road/ Winstanley master plan forms an important part of this with plans to improve legibility, connectivity and sense of place.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	394
Title	Paragraph
Number	6.9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.9. The claim that Clapham Common and Wandsworth Common are within 300 metres of the town centre is again misleading. The two commons are at least 500 metres away from what the Plan terms the focal centre of Clapham Junction. Similarly, the claim that the town centre provides 'some small public open spaces' that provide seating and amenity is also misleading. There are only two very small public spaces, both at the junctions of residential streets with St John's Road, that provide any seating in the town centre.
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Both Common's are within 300m of the town centre boundary. The town centre does provide small public open spaces with seating but as is stressed in paragraph 6.9 this a limited amount and should be improved upon.
Proposed Change	No changes considered necessary

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	395
Title	Paragraph
Number	6.10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.10. The statement that a third of businesses on Northcote Road are restaurants, cafes or bars is misleading. Approximately a half of the protected secondary frontages are currently occupied by such businesses.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is suggested that this text is removed.
Proposed Change	Amend paragraph 6.10 as follows: "...The ground floor predominantly consists of smaller units, many of which continue to be occupied by independent businesses, often of a specialist nature with a growing presence of hospitality/food retail. Around a third of businesses along Northcote Road are now restaurants, cafes or bars which add to the varied offer and vitality of the centre. The weekend pedestrianisation..."
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	

Comment ID	396
Title	Paragraph
Number	6.12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	6.12. The scores for open space and nature in the town centre in particular are gross over-estimates.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Both Open Space and Nature scored quite low in the place performance assessment and would benefit from improvements.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	397
Title	Paragraph
Number	6.13
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	6.13. Almost nothing is said in the rest of this chapter about delivery of key elements of the vision, including the provision of supporting infrastructure, development of social and community uses, improvements to north-south access and to public transport, reductions in traffic congestion, or creation of a network of open spaces. Similarly, there is nothing about delivery of the proposals for any of the site allocations. This is especially worrying since the Government has pushed into the very far future what this chapter terms the anchor and the catalyst for change: the much-needed comprehensive redevelopment of the station and surrounding railway land.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The vision is intended to help guide applicants and the development management team in the council, the delivery of the vision will rest with them not with the Local Plan itself. The delivery of several of the issues you've raised are answered in the local plan in chapters Providing for Wandsworth's People, Sustainable Transport, and Green and Blue Infrastructure and the Natural Environment.
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	398
Title	Paragraph
Number	6.16
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>The Anchor for Change</i> While we welcome the commitment that a masterplan for the area around the station will be prepared in collaboration with stakeholders including the local community, we are disturbed to find that work on the masterplan has already started with the boundaries already set. This is not in compliance with the requirements of the NPPF and the NMDC.
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	Comment noted. The masterplanning process for the area is in its infancy and public engagement will take place over the course of the work.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	401
Title	PM 4 Clapham Junction and York Road/ Winstanley Regeneration Area
Number	Policy 5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy PM4 Clapham Junction and York Road/ Winstanley Regeneration Area</i></p> <p>While we recognise that this strategy covers the nascent Opportunity Area in the London Plan, it fails adequately to acknowledge that the town centre and the York Road/Winstanley Regeneration Area are physically separated by the railway. Non-specific and probably non-deliverable suggestions that access and permeability between the two will be improved do not begin to address this problem.</p> <p>There are no policies here relating to the core placemaking principles of efficient infrastructure and built resilience; or of engagement with nature to support biodiversity and climate change management. Nor is there any explicit reference to meeting local environmental, social and economic objectives and needs as set out in Chapter 2.</p> <p><i>Placemaking 1c.</i> The requirement to improve connectivity with direct and attractive routes to Clapham Junction can be implemented only to a highly-limited extent without complete redevelopment of the station, to include new routes under it and the railway.</p> <p><i>Placemaking 3.</i> See our comments under Anchor for Change</p> <p><i>Placemaking 9.</i> The first sentence rightly belongs in Placemaking 8, rather than in a policy relating in the main to the proportions, scale and coherence of the existing streetscape. The requirement that developments will be expected to increase the quantity of trees in the public realm and on movement corridors fails to take account of repeated studies reported to the Clapham Junction Business Improvement District and other local groups that underground services severely limit the locations in which trees can be planted, and that the scope for increasing their number is extremely limited. This policy is therefore unlikely to be implemented.</p> <p><i>Inclusive Growth 3b.</i> The policy against the amalgamation of units should be accompanied by one against the division or reduction in size of units at the risk of undermining their economic viability.</p> <p><i>Inclusive Growth 4.</i> The policy to support leisure and night-time uses should be qualified by reference to the preceding Policy 3, with its requirement to protect and enhance retail provision.</p> <p><i>People First 1.</i> The reference to a north-south route connecting to Cycle Superhighway 8 cannot be implemented without major redevelopment of the station; and the reference to additional cycle parking should take account of the need to avoid locations where – as it does in some cases at present - it adds to congestion for pedestrians on narrow and busy pavements.</p> <p><i>People First 3.</i> It is unacceptable that the Cultural Strategy refers only to the York Road Winstanley Regeneration Area and not to the Opportunity Area as a whole.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	<p>The introductory paragraphs to the chapter set out several times that the spatial area is separated by a railway.</p> <p>PM4 provides suitable flexible and clear directions and requirements to improve access and permeability in the spatial area.</p> <p>The Local Plan should be read as a whole and policies are established in the Local Plan which address infrastructure, biodiversity and climate change.</p> <p>Policy PM4.B.3.b. concerns particularly directed at supporting smaller independent retailers which contribute to the distinctive character of the frontages on Northcote Road, Battersea Rise and Lavender Hill, and therefore is focused on resisting the amalgamation of units. The Council do not wish to see the converse happening, however, and Policy LP42.F includes a more general policy provision that applies borough-wide which stipulates that where planning permission is granted, the Council may use conditions “to prevent subdivision or amalgamation”. This is intended to protect from the possibility that units will be subdivided such that their operational viability is compromised.</p> <p>Policy PM4.B.4 (relating to the support for leisure and night-time economy uses) should be read alongside PM4.B.3 (relating to the support for the protection and enhancement of retail provision), and does not need to be qualified by reference to it. To note, the former also references LP45, of which part A.3. requires that any night-time economy use must “not detract from the character of the surrounding shops and services during the day-time by creating an agglomeration of blank frontages”.</p> <p>Improvements to connectivity in Clapham Junction and cycle infrastructure to Cycle Superhighway 8 are deliverable without redevelopment of the station but that option cannot be ruled out either.</p> <p>Due to an administrative error the last sentence of Placemaking 8 was added to the beginning of Placemaking 9.</p> <p>The policy can be implemented through ground planting, planters or other means of increasing the number of trees in the public realm and along movement corridors.</p> <p>Any new cycle parking will need to be in accordance with LP51 Parking, Servicing and Car Free Development which sets out guidance to be considered.</p> <p>As Winstanley/ York Road is undergoing a significant regeneration project it will benefit most from a focused cultural strategy aimed primarily at their changing cultural needs.</p>
Proposed Change	<p>Amend and shift wording in policy PM4 as follows:</p> <p>'...Imaginative landscape design can should contribute to the greening of these spaces. 9: Development proposals will be expected to maintain and increase the quantity of trees of an appropriate species as part of a site’s public realm provision and along key movement corridors.</p> <p>9. Development must be sensitive to local character by maintaining and respecting the proportions, scale and coherence of existing terraced streets, shop frontages and listed buildings and their settings.'</p>
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	402
Title	Clapham Junction Spatial Area Map
Number	Map 6.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<i>Spatial Area Maps 6.1 and 6.2.</i> The viewpoint indicated under Falcon Road bridge would give a close-up view of dirty walls. It is surely mistaken. The reference on the two maps to the 'Clapham Junction Station Masterplan' is confusing. We presume the area shown on the maps covers what is referred to elsewhere in the Plan to the 'Urban Heart Masterplan'
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. Yes, the Urban Heart Masterplan Masterplan referred to in the Anchor for change is the same as the Masterplan boundary shown in the spatial area map. The view referenced is an important view for those coming towards Clapham Junction by train and would be an important consideration for any development of surrounding site allocations and developments.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	403
Title	CJ1 ASDA, LIDL and Boots sites, Falcon Lane, SW11
Number	Statement 36
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>CJ1. CJ1 ASDA, LIDL and Boots sites, Falcon Lane</i> This site includes, in addition to the three retail premises named in the title, a Network Rail signalling centre whose future is uncertain. Network Rail has also recently bought the Boots building. The site as a whole has featured as a site allocation for many years, and no significant development has taken place. Nothing in the Plan suggests that there has been any progress towards the 'redevelopment and intensification through a mixed-use development' suggested here, or that it is likely to take place in the foreseeable future. See our comments on delivery at paragraph 22.13. <ul style="list-style-type: none"> • 20. The reference to a frontage to St John's Hill is mistaken. It should refer to frontages to Lavender Hill, Falcon Lane and Falcon Road. • 24. Given the acknowledged and acute shortage of high-quality public space in the town the proposal to develop a small urban square on the Lavender Hill frontage should be pursued as a matter of urgency, with full community engagement in the development of the proposal. • 26. It would critically damage the whole town centre if the significant amount of car parking space currently provided free for up to two hours were to be substantially reduced. But in any redevelopment parking space should be provided behind buildings, alongside the railway, rather than on street fronts.

	<ul style="list-style-type: none"> 28. What might be meant by providing "space for the pedestrian route to continue" from the southern portal of the Falcon Road bridge is wholly unclear. Even more important, there is a critical and urgent need to improve pedestrian facilities in Falcon Lane, which is at present highly dangerous for pedestrians seeking to cross at either end, at the right-angle bend, or indeed at any point along its length. 30. It is unacceptable that Tall Building Zone TB B5b 01 extends all the way up the slope to Lavender Hill. 15-storey buildings would be wholly unacceptable there, and incompatible with Placemaking Policy 1a that proposals should 'respectful of existing character and scale and well- integrated with the surrounding townscape'. and with Policy LP1 A1 that developments should 'ensure a high level of physical integration with their surroundings'.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The masterplan process is intended to assist improve the deliverability of sites and address the shortage of high quality public realm. The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. Development proposals exceeding the appropriate height will not be supported on design grounds.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	404
Title	CJ2 Clapham Junction Station Approach, SW11
Number	Statement 37
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>CJ2 Clapham Junction Station Approach</i></p> <ul style="list-style-type: none"> This site also has a long history as a site allocation. See our comments on delivery at paragraph 22.13. 32. There is different and unacceptable terminology used here in relation to the Urban Heart Masterplan as compared to that in the CJ1 site allocation (6.21), where it is stated that the site 'should be considered as' part of the masterplan. Any work that has already started on the masterplan is incompatible with the NPPF and NMDC requirement for community engagement at every stage from scoping onwards.

	<ul style="list-style-type: none"> • 36. The reference to St John's Road is wrong. It should be to St John's Hill. • 40. See our comment on 6.28 • 43. It is unacceptable that tall building zone TB-B5-01 would allow buildings up to 15 storeys high. That is incompatible with Placemaking Policy 1a that proposals should 'respectful of existing character and scale and well- integrated with the surrounding townscape'.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. For clarification, it is agreed that there should be consistency of wording between CJ1 and CJ2 in this regard and therefore it is proposed that the wording of this part of the site allocation in CJ2 is replicated in CJ1. The process of the producing the Masterplan is yet to be commenced but would include public engagement in accordance with the relevant legislation and Statement of Community Involvement. It is considered that the legend of maps 6.1 and 6.2 could also be changed to clarify masterplan naming consistency.</p> <p>It is recommended that paragraph 6.36 be amended to rectify a typographical error.</p> <p>The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. Development proposals exceeding the appropriate height will not be supported on design grounds.</p>
Proposed Change	<p>Amend wording to paragraph 6.21 as follows:</p> <p>The site provides the opportunity to deliver comprehensive redevelopment and forms should be considered as part of the Urban Heart Masterplan.</p> <p>Amend legend of Maps 6.1 and 6.2 to retitle as follows:</p> <p>'Clapham Junction <u>Urban Heart</u> Station Masterplan Boundary'</p> <p>Amend wording to paragraph 6.36 as follows:</p> <p>6.36 Public Transport - Enhanced pedestrian areas should be provided around the new station entrance and on the St John's Hill Road and Falcon Road frontages.</p>

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	405
Title	CJ3 Land on the corner of Grant Road and Falcon Road, SW11
Number	Statement 38
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>CJ3 Land on the corner of Grant Road and Falcon Road</i></p> <ul style="list-style-type: none"> • This site also has a long history as a site allocation. See our comments on delivery at paragraph 22.13. • 50. See our comments on 6.28 and 6.40 about the provision of 'space for the pedestrian route to continue. • 51. The requirement to strengthen links with the town centre is not deliverable without providing another public access tunnel under the railway; and that is not feasible without major redevelopment of the station.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Access improvements to the town centre would be considered as part of the redevelopment of the station.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	406

Title	CJ4 Land at Clapham Junction Station, SW11
Number	Statement 39
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>CJ4 Land at Clapham Junction Station</i></p> <ul style="list-style-type: none"> • 53. This site allocation fails to take account of the implications of the Station Master's House being a listed building. • 56 Access to the site is via the narrow Plough Road, and cycle infrastructure needs to be improved there as well as on St John's Hill. • 58. Since the ground level of the site is 20 feet or more below St John's Hill, it is difficult to see how the permeability referred to here is to be achieved. And the cross reference to links between the Winstanley regeneration area CJ5 and the station/town centre does not work. Paragraph 6.68 says even less than is said here.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Appendix 1 of the Site Allocation Methodology Paper identifies the Station Master's House as a listed building. It also sets out that any proposed development on this site should ensure that these buildings, as well as other locally listed buildings surrounding the site will not be negatively impacted, and local character is enhanced.</p> <p>LP51 Parking, Servicing and Car Free Development sets out the cycle parking infrastructure requirements for any development including this site allocation. As York Road is a busier road it is considered that particular attention should be paid to it.</p> <p>Access improvements to the town centre would be considered as part of the redevelopment of the station. The wording of paragraph 5.58 is considered sufficiently flexible and clear to ensure the Council's ambitions are met.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	407
Title	CJ5 Winstanley / York Road Regeneration Area, SW11
Number	Statement 40
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>CJ5 Winstanley / York Road Regeneration Area</i> Since a masterplan has already been approved, and work is already under way to implement it, we see little point in this site allocation.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The site allocation includes several stages which have not begun development.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	408
Title	CJ6 Peabody Estate, St John's Hill
Number	Statement 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>CJ6 Peabody Estate, St John's Hill</i> Phase 2 of the development of this site is now nearing completion, and planning applications have been submitted for the final Phase 3 and will be determined before this Plan comes into force. Again, we see little point in this site allocation.
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	The final stage has still not been approved and typically site allocations remain included until construction has begun.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	409
Title	CJ7 36-46 St John's Road and 17 Severus Road
Number	Statement 42
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>CJ7 36-46 St John's Road and 17 Severus Road</i> While we welcome the inclusion, of this site allocation, albeit at a late stage, it is unsatisfactory that the Council has refused to accept the case for including in the strategy for Clapham Junction a site allocation for the nearby, similar-sized and under-used Territorial Army Centre.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The Site Allocation Methodology Paper sets out that this site was considered but dismissed on deliverability grounds.
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	410
Title	Area Strategy for Riverside
Number	11

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 11. Area Strategy for Wandsworth's Riverside</p> <p>This strategy is misnamed and incoherent. It has little to say about the vast majority of the riverside between Beverley Brook and Vauxhall, apart from one policy relating to the riverside at Putney. Rather, it focuses on the area between Wandsworth Bridge and the Cremorne Railway Bridge. Although it is described as an “overarching” strategy, it has nothing to say about the riverside aspects of the strategies for Putney (section 7), Wandsworth Town (4), or Nine Elms (5). Moreover, only one of the site allocations (RIV 6) actually extends to the riverside; and others, including RIV 9, 10 and 11 are a significant distance away from it.</p> <p>At no point in this Chapter is there any reference to the London Plan Policy D9 requirement that developments along the river should protect and enhance the open quality of the river and the riverside public realm. Nor does it refer to the Thames Policy Areas identified in Chapter 9 of the London Plan. Just as unacceptable is the failure to make any attempt to cross refer to the overlapping Policies LP58 and 59 which deal respectively with river corridors and with riverside uses, including river-dependent, river-related and river adjacent uses. The policies are differently worded, and it is far from clear that they are consistent.</p> <p>The Section should be divided into two, providing</p> <ul style="list-style-type: none"> • a comprehensive overview of the public realm, and general development management strategies and policies for the waterfront from Putney to Vauxhall, including Policies LP58 and LP59. Site specific and other issues such as employment could be dealt within this strategic framework, but also in the relevant chapters with cross referencing as appropriate. • strategies and policies covering the York Road/Lombard Road area, including much more emphasis on the traffic and transport issues than included in the current draft. These should include the need for a pedestrian and cycle bridge at Cremorne (the so-called Diamond Jubilee Bridge, which as we noted at paragraph 2.90 the Council believes has little prospect of being built); and plans for a study into the desirability and feasibility of re-opening the station at Battersea High Street.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Wandsworth Riverside Spatial Area is shown on Map 11.1 and is considered to be clear and appropriate for this Local Plan. As an Overarching Spatial Area it overlaps with several individual spatial areas and should be read in conjunction with them as many front onto the Thames River as well.</p> <p>The Placemaking Policies and site allocations in the Wandsworth Riverside chapter should be read in conjunction with the other policies in the Local Plan and where relevant the London Plan.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	411

Title	Paragraph
Number	11.6
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	11.6. The statements here about promoting the 'type of provision [that] would sit more comfortably alongside new residential development' fail fully to meet the commitment in Policy SDS1 E3 that the Council will seek a net increase in the provision of industrial floor space.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The policy approach to industrial land along Wandsworth's Riverside supports the intensification of existing industrial uses locations, and the loss of industrial land is not accepted. In certain locations, such as the Economic Use Intensification Areas (EUIAs), the intensification of industrial land is required. Industrial intensification is also encouraged in the borough's Strategic Industrial Locations (existing and proposed) and in the Locally Significant Industrial Areas, and intensification is required in the Battersea Design and Technology Quarter if office uses are being introduced as part of a redevelopment scheme. These locations have been selected on the basis of evidence compiled in the Employment Land and Premises Study. This paragraph is therefore not considered to be inconsistent with the ambitions of SDS1.E.3.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	412
Title	Paragraph
Number	11.11
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	11.11. The claim that there is a colonnade connection between Ransome's Dock and Elcho Street is false, the colonnade actually links through to Parkgate Road. Elcho Street, although a through route to the river, does not connect directly with Ransome's Dock at present. And the claim that the proposed Diamond Jubilee Bridge will be erected is incompatible, as we noted at 2.90, with the Council's recent statement that there is <i>Currently limited prospect of pedestrian bridge to link riverside with Imperial Wharf given current TfL finances and DfT's priorities.</i>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Reference to Elcho Street should be amended to read Parkgate Road. The active travel bridge between Battersea and Fulham is still being considered and may potentially come forward in the future.
Proposed Change	Amend paragraph 11.11 as follows: "...access to the Dock has been achieved by way of a new colonnade connection to <i>Parkgate Road Elcho Street</i> . The ultimate aim..."

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	413
Title	Paragraph
Number	11.18
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	11.18. The Vision point 4 is again incompatible with Policy SDS1 E3, since it would result in a loss of industrial land. And it is at best in tension with Policy PM9 Inclusive Growth 4.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The aspiration, set out in paragraph 11.18.4, to 'promote residential-led redevelopment to provide new housing, with a mix of small-scale commercial uses in Focal Points of Activity' would need to be applied in the context of the detailed policy requirements for such areas, which is set out in Policy LP35 Mixed-Use Development on Economic Land, Part A.3. This states that 'where the site accommodates existing industrial uses, proposals should fully replace this and should seek to provide for an intensification in industrial floorspace'. This approach is consistent with Policy PM9.B.4.</p> <p>It is noted, however, and is identified in the representation from Heliport London Ltd (#604) that there is a lack of consistency to the approach to the re-provision of office floorspace between LP35.A.3. (which requires that development schemes 'seek to maximise the re-provision of existing office floorspace') and PM9.B.4, which requires the 'protection' of economic land. In response to that representation the Council have promised an amendment.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	

Agent Organisation Details	
Comment ID	414
Title	RIV3 11-25 Chatfield Road and 41-47 Mendip Road, SW11
Number	Statement 58
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>RIV3 11-25 Chatfield Road and 41-47 Mendip Road.</i> It is difficult to understand why this site, which is shown incorrectly on the map, is included as a site allocation. Following a planning consent (2019/5484) awarded in 2020, building work is already well under way. Ideally the site should have included numbers 27-39 Chatfield Road as well. This failure to secure agreements between landowners is a classic example of the Council's inability to maximise the possibilities for high-quality development.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Non-material amendments and the discharging of planning conditions are still in process at this site and therefore it is considered that it should be retained.
Proposed Change	Amend Map 11.1 Overarching Spatial Area: Wandsworth's Riverside as follows: Change the third site allocation under the Growth Locations heading from "41-47 Chatfield Road, SW11 (Ref: RIV3)" to "11-25 Chatfield Road and 41-47 Mendip Road, SW11 (Ref: RIV3)" See appendix 1 for illustration of proposed amendment.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	415
Title	RIV5 York Road Business Centre, Yelverton Road, SW11
Number	Statement 60
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>RIV5 York Road Business Centre</i>. The definition of this space is most odd. On the corner of Holman Road and Lombard Road, Phase 1 of the development was completed in 2020, with self-storage facilities, artists' studios and office space. Building is now under way on the site facing Yelverton Road, following permission granted in 2020 (2019/2295). Only Phase 2 of the Business Centre development remains to be completed. Consent was granted for a 20-storey residential tower on the corner of York Road and Lombard Road in 2019 (2018/3776), but it has not yet been built. A new application has now been submitted for a 23-storey co-living development, which is not compliant with the policies set out in this draft Plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. As this site allocation is still considering live applications and meeting the requirements of the S106 agreement it is considered that it should be retained.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	416
Title	RIV7 Travis Perkins, 37 Lombard Road, SW11
Number	Statement 62
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>RIV7 Travis Perkins, 37 Lombard Road</i>. This site has a long history as a site allocation. See our comments on delivery at paragraph 22.13. The building supplies business on this site is busy, and it is difficult to believe that it could be combined with the mixed-use development proposed. Nor is it clear where Travis Perkins could find a similar well-connected site elsewhere in the borough.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The site allocation description would need to be met for development to be considered acceptable unless other evidence was provided to suggest an alternative use was better suited.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	417
Title	RIV9 The Chopper P.H., 58-70 York Road, SW11
Number	Statement 64
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>RIV9 The Chopper P.H., 58-70 York Road.</i> This site, on which a fourteen-storey building is now nearly complete, should be removed from the site allocations.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. As this site allocation is still discharging of planning conditions it is considered that it should be retained.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	418
Title	PM9 Riverside
Number	Policy 10

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy PM9 Wandsworth's Riverside</i></p> <p>As with the policies set for other area strategies, there is no clear relationship between these policies and the 14 principles set out in Chapter 3, or to the other themes in the spatial strategy in Chapter 2. There is no reference, for example, to the placemaking principles of traffic management and the provision on good public transport, or to the delivery of efficient and resilient infrastructure; or to the inclusive growth principle of promoting work and opportunity; or to the people first principles of maximising health and well-being, or facilitating lifestyle choices. The Plan's failure - despite repeated requests to the Council – to consider the impacts on traffic in general, and public transport in particular, of the intense development of the York Road/Lombard Road area is unacceptable. The policies set out here also fail to acknowledge the noise pollution associated with the heliport. They are thus in tension with the environmental objective set in Chapter 2 and what is said in paragraph 15.85 about measures being taken to reduce or mitigate such pollution.</p> <p>It is also unacceptable that these policies make no reference to the recommendation of the Urban Design Study that “building form must strike a balance between achieving optimal riverfront views without creating a dense wall of development that blocks visibility from buildings and public spaces behind it”. Perhaps this is because many existing developments have failed to strike that balance. The policies are not consistent with London Plan Policy D9 C 1f. We note also that there is no reference to the policy under LP 52 B1 that the Thames Path should be at least six metres wide, an aspiration that is not met at present on many parts of the Path in Wandsworth.</p> <p>As we have already noted, the weakness and inconsistency of the policies relating to industrial – as distinct from the broader ‘economic’ – floorspace is unacceptable. The York/Road Lombard Road area is identified in Chapter 18 as an Economic Use Protection Zone, and the site allocations include several sites (RV1, 4, 6, 7 and 8 for example) currently operate successfully at present for industrial uses, but nothing is said about protecting or enhancing that use. The policies and the site allocations are thus not consistent with Policy SDS1 E3, or with the further policies set out in Chapter 18. It is also unclear how the encouragement of arts and cultural activities (as mentioned in PM9, People First, 4) sits alongside the industrial activity. This further argues for separate treatment of this dynamic part of the Borough.</p> <p><i>Site allocations</i></p> <p>Most of the site allocations are relatively small (some very small). Many of them – RIV1, 2, 4, 7 and 8, for example – were identified in earlier Plans, but have seen little or no development, even where planning consents have been granted (in many cases for buildings considerably taller than the 7-10 storeys indicated as appropriate for tall buildings zones TB B2 02, TB B2 05 and TB B2 06 in Appendix 2). But there is no attempt to suggest measures to make the sites more attractive to developers, for example by creating the kinds of clusters suggested in Chapter 3 (cf the clusters identified for Nine Elms and Wandsworth Town). It would seem obvious, for example, that the RIV2 Dovercourt site might useful be combined with the contiguous RIV6 Lombard Road site; and it is baffling that the RIV4 Gartons Industrial Estate site is not combined with the adjoining RIV10 Travelodge site.</p> <p>This is despite the Council's adoption in December 2015 of Supplementary Planning Guidance (SPG) for the Lombard Road/ York Road Riverside Focal Point and the commitment in the 2016 SSAD to develop an Area Spatial Strategy, to provide further detailed consideration of this area. The current Plan seems to represent, without explanation, a highly-regrettable step back from that SPG. This is made worse by the exclusion of some sites where proposals have been submitted to the Council, including the York Road petrol station and the Access Storage sites. See our comments on delivery at paragraph 22.13.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Wandsworth Riverside Spatial Area Chapter is to be read alongside the other chapters of the plan.</p> <p>Development of York Road/ Lombard Road will be required to meet the transport policies set out in the Local Plan.</p>

	<p>Paragraph 15.85 supports the Placemaking Policy as it sets out that the heliport is a source of noise pollution.</p> <p>The site allocations (RIV1, 2, 4, 7 and 8) are not considered to be inconsistent with the Local Plan policies on economic land (e.g. LP35) nor with the aspirations set out in SDS1.E.3, which supports the protection and intensification of economic uses in certain designated locations. The allocations for RIV2, 4, 7 and 8 all make reference to the need for 'replacement economic uses' (which is defined as including office and industrial land), while RIV1 establishes the requirement for development proposals to adhere to LP35, which requires the re-provision or intensification of industrial floorspace. The policy further clarifies that existing industrial uses must be fully replaced.</p> <p>Where the Council has determined it necessary reference has been included in site allocations to help promote collaborative relationship with adjacent sites (see paragraphs 11.40 and 11.67).</p> <p>The Lombard Road/ York Road SPD should be read alongside the Placemaking Policy and site allocations.</p> <p>Policy LP4 contains criteria regarding the design of tall buildings near the riverfront and is not considered necessary to repeat in PM9.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	419
Title	RIV11 Battersea Church Road / Crewkerne Court Garage, Somerset Estate, SW11
Number	Statement 66
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>RIV11 Battersea Church Road/Crewkerne Court Garage, Somerset Estate.</i> The extremely confusing statements at 11.76, and the mapping of tall buildings zone TB B1 05 along with mid-rise building zone MB B1 10 in Appendix 2 are unacceptable.
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	Comment noted. The description of the building heights appropriate to the site are consistent throughout the document and is considered to be effective in describing how the site relates to the tall and mi-rise building maps.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	420
Title	OUT2 259-311 Battersea Park Road, SW11
Number	Statement 69
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> OUT2 259-311 Battersea Park Road: This site also has a long history as a site allocation. See our comments on delivery at paragraph 22.13. So little is said about this linear site and its design requirements that it is difficult to discern the point of this site allocation. There is no reference to the new Eden Court retirement development; and piecemeal retail, commercial and public service development is likely to continue across the site. The statement that a new library 'could' be provided is unacceptably weak. The area lacks social infrastructure and facilities, and a new library certainly should be <i>provided</i>. While a street frontage would be desirable, it would make sense to divide the site up into its constituent parts.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The site allocation has been included as the Council would like to see it come forward in line with the development consideration and design principles outlined. It is considered that a social infrastructure will likely be needed on the site and that a library could be a good option but there may be other suitable alternatives too.
Proposed Change	No change considered necessary

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	421
Title	OUT4 Randall Close Day Centre and adjacent Surrey Lane Estate Car Park, SW11
Number	Statement 71
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>OUT4. Randall Close Day Centre and adjacent Surrey Lane Estate Car Park.</i> The boundaries of this site inexplicably exclude the adjoining Mission Hall, for which the Council has approved an application for redevelopment. The Society also has strong reservations about the proposals, recently approved, for three new buildings on the site with no detailed consideration of how they might be more effectively integrated with the rest of the Surrey Lane Estate and the redeveloped Mission Hall.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Local Plan is not able to amend existing planning applications.
Proposed Change	No change considered necessary
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	422
Title	OUT6 Hazel Court, Haydon Way, Battersea, SW11
Number	Statement 73

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>OUT6 Haydon Way</i>. The reference here to 'retention' of a care home that was abandoned as unsuitable many years ago is difficult to understand, and incompatible with the proposed co-living development approved at appeal in 2021.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Recent consent for the co-living scheme without any care home element renders the reference redundant. Residential in the form of a care home is not excluded by removing specific reference to it.
Proposed Change	Amend para 13.33 to read, 'Residential-led development including retention of care home facility , and open space'.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	423
Title	OUT5 Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London SW11 3AD
Number	Statement 72
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<ul style="list-style-type: none"> • <i>OUT5. Bridge Lane Medical Group Practice</i>. It is difficult to understand why this small site is included as a site allocation. Any proposed development will be small in scale and readily assessed according to the generic policies in this Plan. And the site fronts on to Battersea Bridge Road, not Cambridge Road.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The site allocation methodology paper sets out the reason for inclusion of the site. The site is in a location that would benefit from site-specific policy to secure the best development outcome with a particular opportunity for intensification retaining health services.</p> <p>The allocation text provides advice on any future development.</p> <p>Cambridge Road merges with Battersea Bridge Road to the front of the site.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	424
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP1 Urban Design</p> <p>A.6. This policy's reference to 'spaces with their edges defined by buildings' provides a green light to developers who wish their buildings to cover their entire site, and thus to sit uncomfortably close to narrow pavements and roads.</p> <p>A.9. This policy on access makes no reference to the need for off-road provision for servicing, deliveries, set down and pick up and for disabled parking. Most roads in Battersea are heavily trafficked and the Council's aim should be to avoid all on-street stopping and parking along main roads.</p> <p>B. The policies and actions outlined here do not go far enough. Transparency – including making public any pre-application advice and responses to it - is essential if the faults of the past are to be avoided. The policy also fails to acknowledge that masterplans have frequently been subverted by the submission of large numbers of reserved matter applications, and by the selling on of sites with no requirement to respect a masterplan. This problem is exacerbated by the lack of transparency and regular review – especially of the <i>cumulative</i> effect of changes - and lack of support for community engagement with respect to amendments.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. LP1 should be read as a whole which contains criteria to prevent buildings covering the entire site. An example of this is LP1 A (4) which requires appropriate set back of buildings.
Proposed Change	No changes considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	425
Title	LP2 General Development Principles
Number	Policy 13
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP2 General Development Principles</p> <p>A. The blanket requirement for developments to provide for a mix of uses is incompatible with Policy SDS1 E3 that the Council will seek a net increase in the provision of industrial floor space.</p> <p>B. While we support the principles relating to the effects on neighbours as well as on current and future occupiers and users it is unacceptable that many developments in the borough over the past decade - at Nine Elms and elsewhere - fail to meet the standards outlined in paragraphs 14.10-14.12. Without enforcement, this policy will not be delivered.</p> <p>C. This policy fails to recognise the constraints on adding to transport infrastructure: lack of space and lack of funds from TfL and Network Rail to ease congestion and overcrowding in a comprehensive manner.</p> <p>F. This policy fails to recognise that the new town centre at Battersea Power Station will have an inevitable negative impact on Clapham Junction and other local centres in Battersea.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP2 is an overarching policy that should be read in the context of the Local Plan as a whole, and alongside other policies where they are sited within particular policy designations. It is not considered to be incompatible with the delivery of a net increase in industrial floorspace, as required by Policy SDS1.E.3, as the policies associated with the policy designations listed would also apply (LP34 for Strategic Industrial Locations and Locally Significant Industrial Areas, and LP35 for Economic Use Intensification Areas, Economic Use Protection Areas, and Focal Points of Activity).</p> <p>Comments about the past performance of the borough's policies (in particular on neighbouring buildings) and the importance of enforcement are noted.</p> <p>Part C of this policy requires developments to take account of planned infrastructure (social and transportation), and where appropriate to contribute to the provision of this. It is recognised that in London transportation infrastructure is often constrained, however it is not within the purview of an individual development to address this. The policy approach is considered sound.</p>

	The development of a new town centre at Battersea Power Station formed a regional and strategic decision, which is set out within both the Local and the London Plans. The impact of the Vauxhall Nine Elms Battersea Area is considered within the Council's Retail Needs Assessment, as well as through impact assessments relating to many of the individual developments being brought forward within that area.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	426
Title	LP3 Historic Environment
Number	Policy 14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP3 The Historic Environment</i></p> <p>While we support these policies, they will prove to be nugatory unless the Council has an adequate number of specialist conservation officers and that their advice is fully respected (as it has not always been in the past). We also note that reviews of the appraisals of many conservation areas are long overdue; and that on current plans many will not be reviewed for several years.</p> <p>14.19. It is unsatisfactory that Heritage Statements or Design and Access Statements are not required to support any significant development in conservation areas.</p> <p><i>Local Views 4, 5 and 6</i></p> <p>The claimed views have not been protected. There are very few parts of Battersea Park or Queenstown Road from which one can see the four chimneys of the Power Station; and none on Chelsea Bridge south of the central span.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	427
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP4 Tall and Mid-rise Buildings</i></p> <p>The policies outlined here do nothing to guard against developers routinely paying a price for land which assumes the Council will find persuasive their need for height and density to provide viability. They thus carry the danger that they will perpetuate the vicious circle of over-priced land and over-tall and dense buildings.</p> <p><i>B, and Appendix 2.</i> The tall building zones identified in Appendix 2 cover large parts of Battersea and - despite the qualifications at paragraphs 14.29-14.31 about not covering the whole zone with tall buildings - they are far too extensively drawn and would allow for unacceptable over-development of excessive height in their context. This applies especially to Zones TB-B3a-01, near Battersea Park Station; TB-B3a-02, south of Queenstown Road Station; and TB-B5-01, TB-B5a-01, and TB-B5b-01, around Clapham Junction. In all these cases, the heights proposed would result in developments incompatible with Placemaking Policy 1a that proposals should 'respectful of existing character and scale and well- integrated with the surrounding townscape'. and with Policy LP1 A1 that developments should 'ensure a high level of physical integration with their surroundings' (see also Policy LP B7).</p> <p>B5. The requirement for 3D modelling should specify that it should show the bulk of the proposed building, not simply a red outline. It should also state that views taken with wide-angle, short-focal-length cameras are not acceptable.</p> <p>B9, 10 and 11. The thrust of these policies may be welcome. But too much has been lost already, and they come too late. Their application would have prevented many of the buildings erected along the Thames over the past decade. Policy B11 on set-backs from the Thames Path is meaningless unless the width of the Path is specified (see Policy LP 52 B1 which specifies that the Thames Path should be at least six metres wide).</p> <p>B15. Shade analysis should include the effect of shade on planting.</p> <p>14.36. The suggestion that adverse effects might be 'appropriately mitigated' gives too much away and is unacceptable. Adverse effects should be <i>avoided</i>, not <i>mitigated</i>.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	General support welcomed. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.

	The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	428
Title	LP6 Basements and Subterranean Developments
Number	Policy 17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP6 Basements and Subterranean Developments</i> It is unacceptable that the Policy makes no reference to the need to avoid damage to neighbouring properties, or the need to avoid neighbour nuisance such as noise from lower-level extensions, light nuisance from subterranean roof-lights etc. A8. The provision of pumps to 'mitigate against' the risk of flooding should be reworded to 'avoid' that risk.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The plan should be read as a whole. General development principles are set out at LP2, and do not need to be repeated in LP6. Wording in respect of the mitigation of flood risk recognises that avoidance is the goal but may not possible in every circumstance.

Proposed Change

No changes considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	429
Title	LP5 Residential Extensions and Alterations
Number	Policy 16
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP5 Residential Extensions and Alterations</i> The reference in A7 to the need for hard-standings to conform to the relevant Conservation Area Appraisal Strategies (CAAS) should be made applicable to all aspects of the policy.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Policy LP3 deals with the historic environment, and will need to draw in advice contained within relevant documents, including CAAs, in the determination of all relevant proposals. There is no need to repeat this in Policy LP5. Criterion A.7 reiterates advice on a common minor household development which requires special consideration.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	430
Title	Paragraph

Number	15.2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Chapter 15 Tackling Climate Change 15.2 The target 'to become a carbon neutral/zero carbon <i>organisation</i> is unclear. Does it refer to development and planning across the borough or is it limited to the carbon footprint of council buildings and in house activities such as vehicle fleets or staff transport policies. Some elements of the WESS Action Plan imply the latter but the Local Plan surely addresses the former. The target to "establish Wandsworth as the greenest borough in inner London" is meaningless unless clear criteria are set against which it will be measured.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comments noted. The policy is considered to be sound and based on a robust and credible evidence base. LP10 Climate Change relates to development and planning across the borough and the policy sets out further how this will be achieved. The WESS is referenced in LP10 as this also sets out measures of how the Council will achieve the targets. The policies within the plan and the actions within the WESS state how it will achieve to become the 'Greenest Borough'
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	431
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p>LP10 Responding to the Climate Crisis</p> <p>The first two sentences of this policy are simply repetitive.</p> <p>A4. The aim to 'maximise the use of river for freight' could be in tension with LP59 A4 which states development will be supported that 'protects and enhances the habitat value of the river and shoreline, promotes the naturalisation of the riverbanks where feasible, and does not cause harm to the operation of the river regime, or its environment, biodiversity or archaeology (including to its banks, walls and foreshore)'.</p> <p>B1 and 2: The requirement for high standards such as meeting BREEAM 'Outstanding' is unacceptably weakened by saying 'unless it can be demonstrated that this would not be technically feasible.' This caveat is symptomatic of many policies throughout planning documentation. Moreover BREEAM is a measure of what <i>is</i> technically possible so the caveat is effectively an oxymoron and actually means 'unless it there is no aspiration to meet this standard'</p> <p>B3: That the BRE Home Quality mark to 'will be expected' is too weak, and should be replaced by 'required'.</p> <p>The great majority of the houses and other buildings that will exist at the end of the Plan period, and even in 2050, already exist. The policy's reference to 'support' for retrofitting, along with the statements in paragraph 15.10 about retrofitting the buildings responsible for the great majority of emissions, is unacceptably passive and weak.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Both Policy LP10 and LP59 will need to be read in conjunction with each other requiring the maximisation of the river for freight to consider the requirements set out in LP59 as well as all other policies.</p> <p>BREEAM Outstanding in some instances may not be achievable depending on the shape and size of the site. The developer must still demonstrate why it can not be achievable to the satisfaction of the Council. HQM and Passivhaus are also encouraged but it is not always possible to apply the standards and therefore it has not been made a mandatory requirement.</p> <p>Agree - wording to be strengthened and updated in relation to rep ID 86.</p>
Proposed Change	<p>Amend policy to include wording to Policy LP10.G as follows:</p> <p>'.....Retrofitting of existing buildings, through the use of low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported. <i>However, there are risks of maladaptation and it is important that right retrofit and adaption of buildings is undertaken.</i>'</p>
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	

Comment ID	432
Title	LP11 Energy Infrastructure
Number	Policy 22
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP11: Energy infrastructure:</p> <p>This policy does not fully meet the requirements of the London Plan Policy SI 3 C, that the Plan should identify proposed locations for future heat and cooling networks; or SI 3 D, that major development proposals within Heat Network Priority Areas – or even in what this Plan calls Decentralised Heat Opportunity Areas - should have a communal low-temperature heating system.</p> <p>The requirement 'to consider' the installation of low, or preferably ultra- low NOx boilers is unacceptably weak.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. LP11 Energy Infrastructure refers to London Plan SI.3D and the requirement to adhere to the energy hierarchy. LP11.D is considered to be acceptable as it is not viable to request all applicants introduce low NOx boilers.
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	433
Title	LP12 Water and Flooding
Number	Policy 23
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP12. Water and Flooding</p> <p>It is unsatisfactory that the references to Zones 1-3b are not supported by a map illustrating those zones; in its absence, the Map 15.2 illustrating surface water flooding risk is potentially confusing.</p> <p>B. The reasons for excluding areas covered by an Area Strategy plus a 400m buffer around town centres is not clear. Indeed, the statement in paragraph 15.32 that 'it is not reasonable for future development within the borough's key growth and investment areas to be located within areas of lower flood risk elsewhere' is as drafted nonsensical. And the statement in the same paragraph that developments 'will need to follow a sequential approach for the final layout and design <i>where possible</i>' is unacceptably weak.</p> <p>Overall, this section of the Plan, and the SFRA, seriously under-estimate the likely frequency and risks associated with flooding, as the current London Flood Review is demonstrating.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Council considers that the use of map 15.2 is clear. As set out in LP 12 for reference on the latest flood zones the most up to date SFRA should be used.</p> <p>LP12 sets out at paragraph 15.32 that; 'The NPPF requires a sequential risk-based approach to steer development to areas of low flood risk both at the plan making and applications stages of the development cycle.' As the Local Plan needs to accommodate growth it is in line with the NPPF that it a sequential test is not required but an exception test will be for the boroughs main investment areas.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society

Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	434
Title	LP13 Circular Economy, Recycling and Waste Management
Number	Policy 24
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP13 Waste management</p> <p>Wandsworth has a poor record on recycling with only around 22% of Local Authority Collected Waste being currently recycled when the London Plan sets out a target of 65%. by 2030.</p> <p>While the Local Plan adequately addresses requirements for provision of recycle <i>facilities</i> themselves, there is insufficient provision in the Plan to ensure that the proportion of recyclable waste actually reaching these facilities can be increased e.g. through requiring on-site recycle collection facilities in privately owned blocks or adding recycling sections to on-street waste bins. The Council should carry out a study of best practice in other London boroughs and set out a programme designed to achieve the target of 65% within the next nine years.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Wandsworth's different roles and responsibilities related to waste are explained in para 15.58 of the Local Plan. The Local Plan is a planning document and can only deal with the issue of waste in land use terms (ie the provision of capacity through built facilities).</p> <p>Wandsworth has separate responsibilities for waste collection and disposal, which includes preparing strategies for waste prevention, reuse and recycling. Wandsworth's plan to ensure waste is reduced and that recycling is increased can be found in the Reduction and Recycling Plan.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	

Comment ID	435
Title	LP14 Air Quality, Pollution and Managing Impacts of Development
Number	Policy 25
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP14 Air Quality, Pollution and Managing Impacts of Development</p> <p><i>A-D Air quality.</i> The Plan recognises (paragraph 15.79) that there are 'several areas of the borough that do not comply with air quality targets and action must be taken to control, minimise and reduce the contributing factors of poor air quality' But this policy falls far short of meeting the requirement to provide strategic, site-specific and area-based policies, should seek opportunities to identify and deliver improvements to air quality. For it specifies only passive responsive action by the Council; and the Council's Air Quality Action Plan falls far short of the action required.</p> <p>Policies D3 and D4 seem to say much the same thing.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The borough is an Air Quality Management Area, which has set out Air Quality Focus Areas which sets out strict mitigation for any development proposals in or around these areas. The Air Quality Action Plan is currently being revised and was out for consultation earlier this year in January 2022
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	436
Title	Providing for Wandsworth's People
Number	16
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>Chapter 16 Providing for Wandsworth's People</u></p> <p>It is unacceptable that there is in this chapter no mention of the objective in the Joint Health and Well-Being Strategy (see paragraph 2.47) to reduce 'the differences in health and life expectancy between the wealthiest and most deprived people'. Nor indeed does it mention the deficiencies in social infrastructure noted at paragraph 2.66, or any of the social objectives set out in Chapter 2, which aim to 'reduce poverty and social exclusion'; to 'ensure' the provision of suitable homes for people in various circumstances, along with community and social facilities, education and training facilities, and healthy environments; and to 'review' poorly performing buildings. The language in this chapter talks instead of supporting and promoting various developments, or guarding where possible against loss, with little or no positive action required by the Council. The whole chapter is therefore incompatible with the strategies and objectives set out in Chapter 2. It is also deficient in failing to say anything about health, social care and educational infrastructure and services; or about sports facilities, or the provision of public toilets. In all these respects it does not meet the requirements of the London Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. LP15 sets out the Council's policy to address health and well-being inequalities. In the background text to LP 15 paragraph 16.7 this highlights the issue of social determinants of health inequalities. LP15.B.4 cross refers policy LP15 and LP17 to ensure that new or improved facilities or loss of health and social care facilities accord with the requirements of Policy LP17.</p>
Proposed Change	<p>No change required.</p>

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	437
Title	LP15 Health and Wellbeing
Number	Policy 26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP15 Health and Wellbeing</i></p> <p>It is unacceptable that there is no mention here of measures to reduce differences in health. Nor is there any mention of the use of health impact assessments for new developments, or the loss of existing facilities and services.</p> <p>B1-6. We note that the Council's record over the past decade in guarding against loss of services including community spaces, medical and health facilities, and pubs is at best mixed.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. LP15 Part A sets out that; The Council will promote and support development, particularly within priority neighbourhoods including in Tooting, Battersea, Queenstown and Roehampton. This will help residents to lead healthy and active lifestyles by including measures to reduce health and well-being inequalities and LP15 Part A details how the inequalities will be tackled. LP15 Part B a requires a Health Impact Assessment for new developments over 50 . LP17 Part B Social and Community Infrastructure relates to loss of facilities.</p>
Proposed Change	No change required.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	

Comment ID	438
Title	LP17 Social and Community Infrastructure
Number	Policy 28
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP17 Social and Community Infrastructure</i> This policy is unsatisfactory since it says nothing about the Council's role and responsibilities in providing social and community infrastructure, beyond supporting and enabling developments proposed by others. It does not even mention any of the issues and problems relating to the delivery of such infrastructure set out in the Infrastructure Development Plan (IDP). Nor does it say anything about health and social care infrastructure, or address the issues set out in Policy S2 of the London Plan relating to health and social care facilities.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is considered that policy LP17 is sufficiently worded and reflects the Council's intention to protect and enhance existing facilities. The Council has consulted and worked closely through the Local Plan consultation stages with the relevant health providers to ensure their comments are considered within the policy.
Proposed Change	No change required.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	439
Title	LP19 Play Space
Number	Policy 30
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>L19 Play Space</i> Neither this policy nor LP 20 says anything about the borough's deficit in places for sport, as acknowledged in the IDP.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	LP54 Open Space, Sport and Recreation and the Playing Pitch Strategy set out the Council's existing capacity and deficit in places for sport.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	440
Title	LP20 New Open Space
Number	Policy 31
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP20 New Open Spaces</i> The statement at paragraph 16.49 that "New open space should be green space such as a local park, however (sic), civic spaces can be considered" is nonsensical, and incompatible with statements elsewhere in the Plan about the provision of new open spaces (for example in Chapter 6, paragraphs 6.24, 6.34 and 6.84; such examples could be multiplied).
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	LP20 New Open Space sets out requirements for open spaces in the borough and sets a preference for them to be green spaces but acknowledges that there are circumstances where hardstanding civic spaces may be more appropriate, such as in site allocations CJ1 ASDA, LIDL and Boots sites, Falcon Lane and CJ2 Clapham Junction Station Approach as has been mentioned
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	441
Title	LP21 Allotments and Food Growing Spaces
Number	Policy 32
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP21 Allotments and Food Growing Spaces</i> A and C. While we welcome the requirement for food-growing spaces to be included in major developments and for fruit trees to be considered in any new development, it is very odd that these requirements are not mentioned in Policies LP1 and/or LP2. And it is unacceptable that the policy, like the Infrastructure Development Plan (IDP), requires no action from the Council to tackle the acknowledged huge deficit in the provision of allotments.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Policy LP21 Allotments and Food Growing Spaces sets out the requirements for allotments and does not require replication in LP1 or LP2. The Council aims to tackle the deficit by requiring developers to provide community spaces for growing food.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	442
Title	LP22 Utilities and Digital Connectivity Infrastructure

Number	Policy 33
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP22 Utilities and Digital Connectivity Infrastructure</i></p> <p>This policy is seriously deficient and unacceptable, not least because there is no clear relationship between it and Policies LP 11 (energy infrastructure), LP12 (water and flooding) and LP13 (waste), or to the IDP.</p> <p>The IDP refers (page 27) to this policy stating that it 'outlines how new infrastructure to support a proposed development will be required'; but that is at the best only very partially true. It then goes on to claim that 'This will ensure that any new proposals ... will bring forward additional provision to meet the new demand', which is an obvious non-sequitur: outlining a requirement does not ensure that it will be met, particularly by an enabling approach. This applies to infrastructures as a whole, where we note that the IDP identifies no major infrastructure projects.</p> <p>Given the importance attached to digital infrastructure here, as well as in the goals for 2038 set out in Chapter 2 and in the Placemaking principles in Chapter 3, it is unacceptable that it features so little (if at all) in the area strategies in Chapters 4-13; and that even in this policy the Council proposes only an 'enabling approach', rather than active measures to improve digital connectivity while minimising any negative impact on the environment.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>LP22 Utilities and Digital Connectivity Infrastructure is to be read in conjunction with the policies referenced in your comment and the IDP.</p> <p>The IDP identifies several major infrastructure projects and is a living document that is expected to change over the course of the Local Plan period. There are many stakeholders involved in planning for infrastructure. The IDP and the Local Plan form part of the consideration in infrastructure delivery.</p> <p>The policy is considered to be sufficient for the entire borough as it is not considered necessary to prepare a bespoke approach to digital infrastructure for each spatial area. The supporting text provides sufficient detail to ensure digital connectivity is brought forward in an acceptable way.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	443

Title	Providing Housing
Number	17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 17 Providing Housing</p> <p>The policies set out in this chapter do not meet the test of soundness because they take as a given – something about which the Council believes nothing can be done – Wandsworth's recent and current high levels of inward and outward migration by young adults. But these very high levels of migration - amongst the highest in the country - are unsustainable and result in a population highly skewed by age, especially in Battersea, which has the highest proportion of 25-34 year-olds in the UK. They are also incompatible with the Council's aims, set out at several points in Chapters 2 and 3 (2.58, 2.81-82, 3.16) and in the area strategies, to establish what are variously described as cohesive, inclusive, mixed, balanced, settled, blended and stable local neighbourhoods and communities. Those aims are repeated regularly throughout this chapter, and they have implications for all aspects of housing provision, especially in relation to affordable housing and housing mix. But the Plan fails to recognise that the policies outlined here will exacerbate rather than easing the problem.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The Local Plan needs to be based on demographic data. The policies of the plan aim to provide for the housing needs of a wide range of the borough's population based on the data available.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	444
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP 23 Affordable Housing</i></p> <p>This policy fails the test of soundness because it does not meet the borough's needs. The Local Housing Needs Assessment (LHNA) notes that there are 8,800 households on the Council's Housing Register, and it estimates that there is a need for nearly 3,600 affordable homes each year over the Plan period, nearly twice the overall target for new homes. In that context, LP23A's statement that the Council will 'seek to maximise the delivery of affordable housing' and 'contribute' towards the London Plan's target that 50% of all new homes should be affordable is far too weak. The Council has a long record of failure in seeking to meet even its current targets of 33% affordable homes across most of the borough and a deplorable 15% in Nine Elms. The Council's record over the past decade suggests that viability assessments repeatedly conclude that even the minimum thresholds are unachievable.</p> <p>The 50:50 tenure split between low-rent and intermediate products represents a significant and damaging change from the 60:40 split in favour of affordable rent in the current Plan, and it is not justified by evidence of the need for low-rent housing. The justification offered in paragraph 17.11 is convoluted and unconvincing, since it is based on the argument that the Council will not be able to meet the demands of people whose objective need is for social housing, but who will not be high enough up its priority list. For many of those people, the intermediate products will be unaffordable, especially since London Affordable Rents have tended to be set at a higher level in Battersea than in neighbouring boroughs. Moreover, for those who can afford intermediate products, evidence suggests that tenures such as equity sharing have not met the policy goal of providing a route to home ownership.</p> <p>17.16. It is unacceptable that the Plan does not fully accept the London Plan policy that that the proportion of affordable housing in a scheme should be measured by habitable rooms, in order to ensure that affordable homes are delivered in a range of sizes, including family-sized homes. Its hedging around this provision by requiring developers to provide measurement by units and by floorspace seeks to retain comparisons that offer incentives to provide too many small units, especially studio accommodation and one-bedroom flats.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Viability and deliverability are key factors in meeting housing needs, particularly for affordable housing.</p> <p>The tenure split reflects the policies in the London Plan and is based upon the evidence gathered for the Local Housing Needs Assessment.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	445
Title	LP24 Housing Mix
Number	Policy 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP 24 Housing Mix</i></p> <p>We have noted above that the current levels of inward and outward migration, especially by young adults, are incompatible with the Council's aim to establish stable local neighbourhoods and balanced, cohesive communities. But both the LHNA and the figures in this policy fail to recognise that the current and projected over-provision of small units stimulates inward migration of younger adults, while the under-provision of family-sized units stimulates outward migration by people seeking such housing. Wandsworth, and more especially Battersea, have a higher proportion of one-bedroom units, and a lower proportion of three-to-four-bedroom units, than the London average; and the dearth of family-sized housing, available at prices that young adults can afford, is a key driver of outward migration and militates against the creation of stable and cohesive communities. The policy of focusing new housing provision, both for the market and (even more so) for the affordable housing sectors, on one-bedroom and two-bedroom units is thus perverse. It is also incompatible with the Vision at paragraph 2.58 which specifies greater choice in the type, size and tenure of housing, particularly for families.</p> <p>The provision of new family-sized housing should be a priority for the Council; but it has not in recent years met even the limited proportions of three-four-bedroom-units set in previous Plans. The new Plan's reliance on limited measures set out in LP 25 and LP26 to guard against the sub-division of existing family-sized houses, concentrated among the Victorian and Edwardian terraces typical of many parts of south Battersea, is simply unacceptable. It will exacerbate existing imbalances and inequities between different parts of Battersea, with similar effects in the rest of the borough.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The tenure mix reflects the policies in the London Plan and is based upon the evidence gathered for the Local Housing Needs Assessment The plan contains policies to aim to meet need, including meeting the borough's need for family housing.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society

Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	446
Title	LP25 Protecting the Existing Housing Stock
Number	Policy 36
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP25 Protecting the Existing Housing Stock</i> Policy C, and paragraph 17.24, fail to address the problems caused by the rapid expansion of AirBNB and related services, and the related reductions in housing for permanent residents. They say nothing about the enforcement of the 90-day rule, under which houses can be used for overnight accommodation with damaging consequences for residents nearby.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Local Plan proactively protects existing family housing. Policy LP46 deals with visitor accommodation, but permitted development falls outside the remit of planning policy.
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	450
Title	LP29 Housing with Shared Facilities
Number	Policy 40

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP 29 Housing with Shared Facilities</i></p> <p>While we support the proposed resistance to large-scale purpose-built shared living accommodation, we note that even as this Plan was being prepared, the Council has approved applications for such developments in direct contravention of the proposed new policy C1.</p> <p>17.44. The wording of the first sentence here represents a significant weakening of Policy LP29 C1, and it is not acceptable.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy aims to strike a balance between the London Plan policy which allows co-living within the scope of its criteria, and Wandsworth's stance, which is more resistant. This is not to say that all schemes will be refused; the criteria set in LP29 aim to define the circumstances under which schemes may be acceptable.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	451
Title	LP30 Build to Rent
Number	Policy 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP 30 Build to Rent</i></p> <p>The requirement to provide where possible a separate core and/or block to provide low cost rented housing to be managed by a registered provider contravenes the London Plan Policy H11 which requires 'unified ownership and unified management of the private and Discount Market Rent elements of the scheme'. It is also incompatible with Policy LP27 in this Plan, which requires that housing must be designed to be 'tenure blind' to ensure that dwellings across all tenures are indistinguishable from one another in terms of quality of design and materials, space standards and access'. It is therefore unacceptable.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The supporting text sets out the Council's preference, where possible, to secure low cost rented housing through BtR schemes, allowed for by London Plan para 4.11.10. Under these circumstances, criterion A.1 would apply, and reference to an RP is relevant and necessary, alongside the reference, in design terms, to a separate block which is designed to aid management.</p> <p>The policy is considered to be clear in its approach to the BtR sector and positively worded. London Plan policy H11 is clearly referenced as a starting point, but the Council seeks to determine locally relevant criteria as allowed for within the London Plan.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	452
Title	LP31 Specialist Housing for Vulnerable People
Number	Policy 42
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP 31 Specialist Housing for Vulnerable People</i></p> <p>This policy fails to refer to Policies H12 and H13 of the London Plan, or to meet some of those policies' key requirements, relating for example to inclusive design, or the need for drop-off and pick-up points.</p> <p>The LHNA shows a huge under-provision of specialist housing compared with the guidelines suggested by the Housing Learning and Improvement Network (LIN). But no measures are indicated here to remedy that imbalance between need and supply. The LHNA also suggests that adapting existing homes should be a priority for disabled people under 65. This is reflected at paragraph 17.55 in the Plan, but it is not included in the policies set out here. It should be.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Whilst there is no specific reference to London Plan policies H12 and H13, the supporting text picks up elements of these policies demonstrating a clear link (such as the targets for the borough in policy H13). Provisions of the London Plan do not need repeating in the Local Plan. The Plan seeks to respond to the requirements set out in the LHNA.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	

Agent Organisation Details	
Comment ID	453
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 18: Building a Strong Economy LP33. Promoting and Protecting Offices</p> <p>Although there have been some mentions of Economic Use Intensification Areas (EUIAs) and Economic Use Protection Areas (EUPAs) earlier in the Plan, it is unsatisfactory that up to and including this point, there has been no explanation of what they are., or where they are located. It is thus also unsatisfactory that they are included here as suitable locations for offices, with no explanation, for which we have to wait until paragraphs 18.49 to 18.54. The same might be said of Focal Points of Activity (paragraphs 18.55ff), which are inexplicably missing from among the suitable locations for offices in this policy.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>In accordance with the NPPF (paragraph 23), the location of land use designations, such as Economic Use Protection Areas and Economic Use Intensification Areas, will be set out on a separate policies map. This formed part of the consultation. All of these designations are also included on Map 18.1 Economic Land, which immediately precedes Policy LP33.</p> <p>It is agreed that references to these designations could be introduced earlier in the supporting text in paragraph 18.11, which should also be amended to correct an inaccuracy, however that these are most clearly addressed in the context of Policy LP35 (Mixed Use Development on Economic Land), which sets out the criteria for development.</p>
Proposed Change	<p>Amend paragraph 18.11 to read:</p> <p>"The local/sub-regional office market in Wandsworth comprises approximately 382,000 sqm of floorspace dispersed across the borough (as of 2019). Premises are mostly small and are primarily located <i>in and around many of the borough's town centres (in particular in Wandsworth Town Centre)</i>, along the River Thames in Focal Points, <i>and in small clusters of economic use (identified through the designation of Economic Use Protection Areas and Economic Use Intensification Areas, see Policy LP35 for more detail)</i> in Wandsworth Town Centre, and – to a lesser extent – within the Queenstown Road SIL and the borough's LSIs; with some medium-sized premises also located in Putney Town Centre. Occupiers are generally split between the more traditional SMEs and sole traders, ranging from legal, accountancy and small consultancy firms, through to creative and cultural industries, and public organisations."</p>
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society

Agent Full Name	
Agent Organisation Details	
Comment ID	454
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP34. Managing Land for Industry and Distribution</p> <p>The policies here focus on protecting and retaining existing industrial land; and they are therefore at best in tension with Policy SDS1 E3, which seeks an <i>increase</i> in industrial floorspace. There is no indication of how the net requirement identified in the Employment Land and Premises Study 2020 (ELPS) - 8.6 hectares of industrial land, or an additional 35,700 sqm (a land equivalent of 5.5ha), required to accommodate demand for core industrial uses - will be delivered. Reliance on the oft-repeated 'intensification' of the use of existing sites is completely unrealistic. There are no details of the amounts of additional floorspace that could be provided in specific locations, either in the area strategies or in this chapter.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Policy LP34.B.3. clearly states that the Council will support the intensification of sites for industrial purposes, which has been well received by landowners in the corresponding designated industrial areas, the Locally Significant Industrial Areas (LSIA) and Strategic Industrial Locations (SIL). Further detail on how this might be achieved is included in paragraph 18.28 of the supporting text, including the development of multi-storey schemes, the addition of basements, and the more efficient use of land through high plot ratios. This approach is consistent with the London Plan and is supported by the borough's evidence base (the same document which identifies the need). Furthermore, industrial intensification is required as part of the mixed-use redevelopment of the Battersea Design and Technology Quarter area of the Queenstown Road, Strategic Industrial Location (alongside SME office and technology uses) and on existing non-designated industrial land outside of the borough's LSIA and SIL (see Policy LP35 Mixed Use Development on Economic Land). Area-based guidance has been published which provides further detail on how these approaches are to be realised in the Wandle Delta Masterplan SPD and the Battersea Design and Technology Quarter Economic Appraisal and Design Framework. Further information on how the borough intends to meet the identified need is also set out in the borough's Housing and Economic Land Availability Assessment. This identifies that the supply of core industrial capacity over the period to 2037/38 (of c.45,000sqm) exceeds the identified floorspace need (of 35,700sqm).</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	

Agent Organisation Details	
Comment ID	455
Title	LP35 Mixed-Use Development on Economic Land
Number	Policy 46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP35 Mixed Use Development on Economic Land</i></p> <p>Mixed use development is specified in all the Area Strategies (Chapters 4-12). It is unacceptable that none of them includes a cross-reference to the requirements set out here. It is odd and unacceptable that town centres and the nine local centres are not specified here as locations suitable for mixed use development.</p> <p>18.49-55. The distinctions between Economic Use Intensification Areas (EUIAs), Economic Use Protection Areas (EUPAs) and Focal Points of Activity are not well-articulated, nor are their roles made clear.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The requirements set out within Policy LP 35 Mixed Use Development on Economic Land relate to specific policy designations and to 'economic land' as defined within the Local Plan (broadly composing of office and industrial uses, see the Glossary for the full definition). They do not therefore preclude mixed-use development from coming forward in other appropriate locations, such as town centres. The policy requirements for development in these locations are set out in LP42 Development in Centres, which notes that development should provide a 'suitable mix of uses' and permits high-density residential-led mixed-use development in appropriate locations. This policy provides reference to the Area Strategies, although it is noted that the Local Plan (including the Area Strategies and the topic-based policies) should be read as a whole.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	456
Title	LP52 Public Transport and Infrastructure
Number	Policy 63
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	It is essential that all new and existing routes along and across the river are designed and surfaced to minimise conflict between different users, especially between those on bike and on foot. This also needs to be addressed in Policy LP52 B and be supported by similar text to that supporting a riverside walk along the Thames (paragraph 20.41). We commend the pedestrian priority and approach developed for towpaths by the Canal and River Trust
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>We note the Canal and River Trust guidance which could be used as a material consideration, however, Para 20.7 refers to TfL and DfT guidance which is considered sufficient.</p> <p>LP52 is considered sound but there have been several administrative errors which led to the deletion of two paragraphs (A2 and A3) from LP52 which it is considered could be reinserted as minor amendments. This could also necessitate a small reshuffling of paragraphs to ensure it reads coherently. The policy would then address this concern that riverside walks should where possible allow for provision of cycling, ensuring pedestrian safety. It is not the remit of the Local Plan to redesign and resurface existing riverside paths, however, if they were to be enhanced in the future this policy would apply.</p> <p>It is not considered necessary to introduce supporting text for enhancements to the Wandle riverside as the new policy for LP52 (B) wording is considered sufficient.</p>
Proposed Change	<p>Amend policy to include wording in policy LP52 after part A(1)(c) as follows:</p> <p><i>2. Land will be safeguarded for future transport functions where necessary. New and additional land for transport functions and infrastructure will be sought to address deficiencies in provision and/or to accommodate expected future demand. Financial contributions to public transport improvements and other transport infrastructure can be made in lieu of provision in special circumstance.</i></p> <p><i>3. The Thames and Wandle riversides will be protected as they are key routes for walking and cycling in Wandsworth but also important natural resources. It will be expected of development on riverside routes that:</i></p>

	<p>Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)) and:</p> <p>a. provision is made for riverside walks and access at least six metres wide (Thames) or at least three metres wide (Wandle), and appropriate to the scale of development, along the entire river frontage except for safety, operational or nature conservation reasons;</p> <p>b. any new accesses linking the riverside walk to the surrounding area are at least three metres wide;</p> <p>c. riverside walks should where possible allow for provision of cycling, ensuring pedestrian safety; and</p> <p>d. the Environment Agency has been consulted for all developments adjacent to a watercourse.</p> <p><i>B. Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)).</i></p>
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	457
Title	Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres
Number	19
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 19: Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres</p> <p>The policies set out in this chapter will need urgent review in the light of the changes since the pandemic, which has had a catastrophic effect on many businesses in the borough's town centres: there must now be huge uncertainty about the projections set out in the Retail Needs Assessment (RNA) completed in the first half of 2020. Supporting the recovery of town centres and businesses must now be a key strategic aim for the Council, working with other bodies including the Business Improvement Districts and the GLA's London Recovery Programme. Some of the policy objectives set out in this chapter, including the promises of protection for the key characteristics of the borough's town centres, do not take full account of recent changes in Government policy, such as the creation of Class E, and the extension of PDRs to allow the conversion of any Class E premises to residential use.</p> <p>But there is little evidence in the Plan of the kind of innovative thinking emerging from the High Streets Task Force and other sources: developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management. These and other things are essential if the Council is to work effectively with others in re-imagining what high streets might be.</p> <p>The policies also fail adequately to recognise the relevance and impact of policies set out elsewhere in the Plan. While we recognise that the Plan must be read as a whole, it is unsatisfactory that several policies - including LP 17 on social infrastructure; LP 19 on play spaces; LP20 on open spaces; LP35 on mixed use developments; and LP37 on requirements for new economic development – make no reference to the needs and the potential of town centres and local centres. By contrast, other policies that do focus on town and other centres, such as LP 18 on arts and entertainment, are not considered in this chapter at all.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The draft Local Plan recognises that the Coronavirus pandemic has already - and will continue to have - a significant impact on the borough's centres and parades, and will likely result in an increase in vacancies (particularly over the shorter-term). The Retail Needs Assessment is predominantly based on spending projections, and the Council consider that the broad conclusions about likely spend still provide a good indication of potential demand over the course of the Local Plan period (the longer-term). It is recognised that there may be greater 'local spend', as a result of a trend towards working from home; however this may seek to counter some of the vacancy caused by the enforced closure of town centre uses during periods of lockdown. The Council will, in the review the Local Plan, commission more research at the appropriate time and once more reliable data is available, and the policies will be adjusted accordingly as part of future reviews of the Local Plan.</p> <p>The draft Local Plan does, contrary to these comments, introduce some quite significant changes to its approach to town centre management, in particular with respect to land use (the core issue for a Local Plan), permitting a much greater degree of flexibility over the use of retail units in core and secondary frontages. This accords with the Government's broader initiatives through the introduction of a more diverse 'Commercial, business and services uses' Use Class E , which has amalgamated various former distinct town centre uses, and was introduced directly as a response to COVID. The Council has liaised with business representatives through the Chamber of Commerce and via meetings with the BIDs. Broadly, the flexibility over land use has been welcomed by businesses, and is recognised as reflecting broader trends within centres that pre-dated the pandemic.</p> <p>That notwithstanding, the Plan continues to advocate for the protection of certain uses - such as offices and, where possible, retail units. It is important to note that despite Class E, certain applications will still require planning permission, and in such cases that Council consider that it is important to afford appropriate protection for the replacement of retail facilities, or to prevent against over-crowding of uses.</p> <p>The introduction of new Permitted Development Rights (PDR) enabling the change of use of properties in Class E to C3 (dwellinghouses) poses risks to the protection important uses in key locations (such as centre and clusters of economic uses), and the Council has taken forward an Article 4 Direction to limit the extent of the PDR.</p> <p>The representation refers to the 'need to make reference to the needs and the potential of town centres and local centres' with regards to various other chapters within the Local Plan. If a development proposal is located in (or impacts upon) a town or local centre, then these policies will be considered as part of the assessment of that policy. It is noted that certain policies, such as LP35 (Mixed Use Development on Economic Land) concern designations that are not located within town or local centres.</p>
Proposed Change	No changes are considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	458
Title	LP41 Wandsworth's Centres and Parades
Number	Policy 52
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP41 Wandsworth's Centres and Parades</i>

	<p>The RNA suggests that the Council should review its town centre and other boundaries, and its strategic approach to designated frontages, which have not been reviewed for many years. But the Council has not done so, and this policy is thus unsound and unacceptable. The many oddities in Battersea include, for example,</p> <ul style="list-style-type: none"> • the failure to designate any part of St John's Hill west of the railway bridge either as part of Clapham Junction town centre or as a local centre (the designation of nos.115-141 as an important local parade ignores the important commercial premises at nos. 91-111 and 143-171, as well as nos. 110-142 on the north side of the road); • the failure to provide any designation for the commercial premises at nos. 83-175 Lavender Hill, or to include them in the Queenstown Road/Lavender Hill local area; • the exclusion of nos. 324-356 in the Battersea Park Road local area; and • the failure to provide any designation for the commercial premises on Falcon Road north of the railway bridge. <p>The distinction between those properties and others which are designated, such as nos.35-56 and 65-71 Webb's Road is incomprehensible. There are many other unexamined peculiarities relating to town and local centre boundaries, and to the distinctions between core, secondary and other frontages across the borough. The current designations are not fit for purpose, which may lead to perverse decision-making.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Retail Needs Assessment recommended a limited number of changes to main town centre boundaries, all of which were considered as part of the review of the Local Plan. In Clapham Junction the retail and food and beverage projections suggest "there is no capacity for new Class A1 to A5 floorspace for the foreseeable future up to 2035". Given this, and in the context of changes to the NPPF, it is therefore difficult to justify (and would, in fact, be unsound) the extension to the town centre / local centre boundaries.</p> <p>Changes made to the Use Class system during the development of the Local Plan through the introduction of a new Class E have meant that borough's approach to designated frontages - founded on the identification of a unique 'shop' class - can no longer be applied and meant that a comprehensive review of these was not cost-effective. The Council consider that they remain a useful hierarchy which are appropriate to inform decision-making with respect to main town centre uses and to the implementation of Class E. That notwithstanding, it is noted that amendments to certain boundaries have been proposed as part of the Local Plan draft in response to specific representations - including those by the Battersea Society.</p>
Proposed Change	No changes are considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	459
Title	LP42 Development in Centres
Number	Policy 53
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p>LP 42 Development in Centres</p> <p>Key aspects of this policy may be desirable, but non-deliverable as a result of the introduction of the unified commercial Use Class E and the permitted right to change any Class E premises to residential use.</p> <p>Policy LP42 B is unsound and unacceptable. The designation of core, secondary and other frontages as set out at paragraph 19.17 has not been reviewed as recommended by the HNA; and in many cases, such as the Lavender Hill/ Queenstown Road local centre, the designations are irrational.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP42 has adapted the policy approach within the adopted Local Plan (based on a threshold approach for the number of retail units) to account for the introduction of Class E. This is necessary to account for consistency with national policy, and is considered appropriate given the greater diversity of (non-retail) uses within town centres. The policy is considered to be deliverable.</p> <p>The introduction of new Permitted Development Rights (PDR) enabling the change of use of properties in Class E to C3 (dwellinghouses) poses risks to the protection important uses in key locations (such as centre and clusters of economic uses), and the Council has taken forward an Article 4 Direction to limit the extent of the PDR.</p> <p>Please see the Council's response to comment #459 with regards to designated frontages.</p>
Proposed Change	No changes are considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	460
Title	LP45 Evening and Night-Time Economy
Number	Policy 56
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP 45 Evening and Night-Time Economy</i></p> <p>While we acknowledge that the Council is currently developing a night-time strategy for the borough's town centres, it is at best disappointing that in the policies neither for Clapham Junction nor for town centres generally (Chapter 19) is there any reference to Policy HC6 in the London Plan, or to key issues that it covers, including the integration of planning and licensing; diversifying the range of services; or the use of the public realm. The policy also underplays the role of Clapham Junction as a regional hub.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Alongside the Council's commitment to develop a Night Time Strategy (as in part A), various other aspects of Policy HC6 in the London Plan have been incorporated in Policy LP45. These include references to the diversification of night-time economy uses (see LP45.A); improving access, inclusion and safety, including with respect to travel to and from the venues (LP45.A.2); and considering how to mitigate the potential negative impact on amenity (LP45.A.3). It is agreed that this latter point should be amended to also refer to the cumulative impact of night-time economy uses, as referenced in the London Plan (HC6.B.4).</p> <p>Policy considerations relating to the public realm and the appropriate location of town centre uses (whether they form part of the night-time economy or not) are addressed elsewhere in the Local Plan, in Policies LP1 The Design-led Approach and LP42 Development in Centres, respectively. It is not considered that they need to be repeated in Policy LP45. Issues relating to the management of the night time economy, such as the integration of licensing and planning, will be addressed in the Night Time Strategy.</p>
Proposed Change	<p>Amend LP45.A.4 to read:</p> <p>"do not result in a negative impact on the amenity on the surrounding residential and non-residential uses, as a result of the use itself or from those travelling to and from the use, taking account of the cumulative impact. Conditions may be used, including limits on hours of operation, in order to ensure this."</p>
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society

Agent Full Name	
Agent Organisation Details	
Comment ID	461
Title	LP46 Visitor Accommodation
Number	Policy 57
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP 46 Visitor Accommodation</i> While the policy to restrict new visitor accommodation to town centres and to avoid undesirable impacts elsewhere is welcome, it fails to acknowledge the number of hotels that have already been approved elsewhere, along with new proposals now being considered. It also fails to recognise the highly damaging impacts of the growth and concentration of AirBNB and similar services in other parts of the borough. The failure to monitor or enforce the 90-day rule exacerbates these problems, and it needs to be tackled as a matter of urgency.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The policy approach set out in the draft Local Plan is more restrictive than that within the adopted Local Plan. Comments on the enforcement of the 90-day rule have been passed on to the relevant team. Policy LP25 includes a limit on short term holiday lets where consent is required.
Proposed Change	No changes are considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	462
Title	LP47 Markets
Number	Policy 58
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP 47 Markets</p> <p>This policy fails to recognise the extent to which street markets in Northcote Road, Battersea High Street and elsewhere have declined in recent decades, for reasons including the loss to approved development of the necessary off-street yards for storage; or the need for active measures to sustain and revivify them. Promises to protect what remains, along with passive measures to support proposals for expansion do not go far enough.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. It is agreed that consideration should be given within the Local Plan to the impact of adjacent development on the operation of existing markets.</p> <p>The policy does sets out a framework of support for the "enhancement and/or expansion of existing markets". It is not within the remit of this document, however, to put forward more 'active measures' for their operation or expansion.</p>
Proposed Change	<p>Amend policy to add a new clause ('D') to LP47 Markets to specify that:</p> <p><u>"Proposals for development on sites adjacent or in close proximity to existing markets must not negatively impact on the operation of those markets, giving particular consideration to operational storage requirements."</u></p>
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	463
Title	LP48 Meanwhile Uses
Number	Policy 59
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP 48 Meanwhile Uses</p> <p>We believe meanwhile uses are important and should be both encouraged and supported. On major development sites initiatives such as that of Westminster Council's in Ebury Bridge Road has both enlivened the street and provided a valuable community resource. We have already recommended that the new school site in Nine Elms should follow this excellent example and are pleased that CGMA are also receptive to meanwhile uses.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change required.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	464
Title	Sustainable Transport
Number	20
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 20 Sustainable Transport</p> <p>The policies set out in this chapter are unsatisfactory because they do not address the major barriers created for cyclists and pedestrians by overloaded junctions and through routes. These have been exacerbated in recent years by new developments with poor provision for public transport and other forms of active travel. This chapter states (20.10) that 'The Council's key transport challenge is therefore to ensure the provision of the additional sustainable transport capacity that is needed to support its housing objectives and deliver economic recovery, regeneration and growth'. But despite the acknowledgment at paragraph 2.73 and in the IDP that congestion and overcrowding of public transport is a major problem – which will be worsened if the shift from cars to active travel and public transport specified at several points in the Plan actually occurs - nowhere does this chapter state how the additional capacity is to be achieved.</p> <p>The policies make no reference to key issues outlined in many documents such as TfL's <i>Streetscape Guidance</i>, including footway and carriageway materials, interfaces and transitions; the use of tactile paving; controlled and uncontrolled crossings; footway amenities including street furniture; traffic signs and barriers; or street lighting. And the treatment of bus and train services and infrastructure is so slight as to be worthless.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>This chapter is focused on the impact of new development on the transport network and transport related issues.</p> <p>The Local Plan does not provide for additional public transport capacity in the borough which is the responsibility of TfL and other public transport providers. The Local Plan does set out in LP49 Sustainable Transport that the Council support proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users.</p> <p>The Local Plan refers to the Mayor of London Transport Strategy and TfL and DfT's most current guidance with regards the design of infrastructure. Including additional detail from these guides is considered unnecessary.</p> <p>LP52 Public Transport and Infrastructure captures the Council's considerations for public transport and infrastructure.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	465
Title	LP49 Sustainable Transport
Number	Policy 60
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP49 Sustainable Transport.</p> <p>This policy is very poorly drafted. The final clauses of LP49 A have only an indirect relationship with transport. And LP49 1-5 demand of developers not so much provisions that they might reasonably be asked to make, but the delivery of policy objectives and outcomes that neither they nor the Council can guarantee to meet.</p> <p>B: The policies here and in the explanatory paragraphs 20.13-15 refer to the Mayor's 'Healthy Streets' policy which is said to be 'at the centre of transport planning'. It is thus very odd indeed that the policy and its objectives are not mentioned at all in Chapter 3's discussion of Placemaking, or in any of the area strategies when they come to discuss active travel. But nowhere in the Plan (or in the Council's draft Walking and Cycling Strategy) is there any reference to the Disability Discrimination Act (DDA) requirement (transgressed in many parts of Battersea and the rest of the borough) that a minimum of 1200mm width of footway should be provided and kept free of obstructions such as street furniture.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>LP49 Sustainable Transport is focused directly on transport. It is expected that developers will meet the requirements of LP49 B 1-5 but where it may not be possible this will be decided through the development management process.</p> <p>Healthy Streets is central to Policy LP49 and the Sustainable Transport Chapter. The Local Plan's Area Strategies and Placemaking guidance are intended to be read in conjunction with the Policy Chapters and the Healthy Streets Approach will apply to the Area Strategies.</p> <p>The Disability Discrimination Act is set out in law and not required to be referenced in the Local Plan.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society

Agent Full Name	
Agent Organisation Details	
Comment ID	466
Title	LP50 Transport and Development
Number	Policy 61
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP50 Transport and Development</i></p> <p>A central flaw undermines this policy, since it assumes that existing public transport and road capacity is adequate and working well. That is not true in many parts of Battersea and the rest of the borough, where capacity in footways and carriageways, and bus and train services, is demonstrably inadequate.</p> <p>A.1. The reliance on PTALs of 4 or higher unsatisfactory, since it assumes that a high PTAL implies that there is sufficient capacity. The requirement in paragraph 20.21 that major developments should be located where there is both a high PTAL and demonstrably adequate capacity should be made explicit in this policy. Moreover, it is crucially important that assessments should be made of the cumulative effect, on footways and carriageways as well as bus and train services, of many new planned developments each of which individually may have only a relatively small impact.</p> <p>A 4. This policy needs to specify that the improvements to the transport network can be delivered in a reasonable timeframe.</p> <p>D. This policy is so poorly drafted as to be non-understandable. It is not clear whether it is intended to set a requirement that provision for improved transport is made, or a hope that the requirement once made will be honoured.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>LP50 Transport and Development does not assume the existing public transport network is adequate across all of the borough. The Council is undertaking a major redevelopment of the Wandsworth Town Gyrotory to improve how it functions along with many other projects to improve the transport network.</p> <p>Part A2 of the Policy does require that development that will generate a large volume of trips must demonstrate that they have sufficient transport capacity.</p> <p>A transport assessment, if required, will provide all the information about the cumulative impact a development would have on footpaths and the required improvements to the transport network and their timeframe for delivery if required.</p> <p>Part D is considered to be clearly written and sets a requirement on the developer to bring forward any provision or contribution to the transport network.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society

Agent Full Name	
Agent Organisation Details	
Comment ID	467
Title	LP52 Public Transport and Infrastructure
Number	Policy 63
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP54 Public Transport and Infrastructure</i></p> <p>The policies here are unsatisfactory because they say nothing that might fulfil the objective set in Chapter 2 (page 22) of contributing to ‘the efficient operation of London’s overall transport system, with improved access by foot, bicycle or public transport to and from surrounding areas, particularly central London’. Nor do they take account of the requirements set in several of the area strategies – including Nine Elms and Clapham Junction - for new developments to make contributions towards not only improvements public transport infrastructure such as station improvements and stabling facilities for buses, but also enhanced bus services.</p> <p>A. This policy fails to acknowledge that CrossRail 2 has in effect been cancelled, or that the Northern Line Extension has actually opened.</p> <p>B.1. This policy fails to acknowledge that faulty planning decisions in the past mean that the Thames Path in several parts of the borough is not six metres wide. The requirement that riverside walks should where possible allow for provision of cycling, ensuring pedestrian safety needs modification. Where cycling is allowed it should be within managed space rather than a free-for-all of shared space.</p> <p>C. This policy fails to acknowledge the noise pollution associated with the heliport, and it is thus in tension with the environmental objective set in Chapter 2 that measures should be taken to reduce or mitigate such pollution.</p> <p>D. 2 The requirement that minicab offices will be allowed only where “at any time” parking restrictions are in place will be effective only if it is properly enforced. Practical action is needed to avoid the environmental harm and street congestion caused by private hire and delivery vehicles awaiting calls.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The policy sets requirements that will help achieve the objectives established in Chapter 2.</p> <p>LP54 (A) sets out that the Council will promote major transport infrastructure schemes including Crossrail 2, Clapham Junction expansion, the Northern Line Extension to Battersea, improved rail links between South London and Heathrow, suburban rail services, highway improvement schemes, and new pedestrian and cyclist bridges.</p> <p>The Area Strategies and the Policies should be read in conjunction and it is considered that there is no need to cross-refer in this instance.</p> <p>Crossrail 2 is suspended currently but TfL expect for it to come forward in the future. There are final works to be completed on the Northern Line Extension including opening the proposed second entrance at Battersea Power Station, which is why it is still included in the list of projects.</p> <p>Due to the limited space in the borough and along the Thames Path managed cyclist spaces cannot be guaranteed.</p> <p>LP14 Air Quality, Pollution and Managing Impacts of Development sets out the Council’s guidance and requirements for preventing and mitigating noise pollution.</p>

Proposed Change

No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	468
Title	LP51 Parking, Servicing and Car Free Development
Number	Policy 62
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>LP51 Parking, Servicing, and Car Free Development</i></p> <p>This policy is unsatisfactory in failing to set a requirement for off-street space for set-down and pick-up. It also fails to meet the requirement in Policy H6 in the London Plan that all applications that include off-street parking should submit a parking design and management plan. Nor does it set the requirement that parking spaces in residential developments should be leased rather than sold.</p> <p>A2. The cross-reference to Policy LP1 is unclear; for that policy makes no reference to parking.</p> <p>F. The policy that on-street parking permits in CPZs will not be available to residents in new developments does not deal adequately with the acknowledged pressure on parking places, especially at evenings and weekends, when existing residents compete with residents of new car-free developments. Consideration should be given to extending the hours of parking control where pressure on spaces is high. And the policy that that the threshold for withholding access to parking permits should be developments of more than 10 units should be set out explicitly in Policy LP51 rather than being hidden in paragraph 20.35.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>LP51 does require developments to provide adequate off-street servicing arrangements are made for commercial vehicles and general servicing where necessary. There is no requirement for the Council to see targets for set-down and pick-up spaces.</p> <p>LP1 The Design-led Approach sets out guidance for design which should be considered when planning for parking.</p> <p>The Local Plan is not responsible for extending the hours of parking controls in the borough. The supporting text is considered adequate for this policy to be enforced.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society

Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	469
Title	Green and Blue Infrastructure and the Natural Environment
Number	21
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<u>Chapter 21 Green and Blue Infrastructure</u> This chapter is unsatisfactory since it fails to take account of the policies and requirements of the London Plan. Important issues such as geodiversity and the requirement to undertake an open space needs assessment are not even mentioned.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Local Plan includes where it is considered relevant policies from the London Plan, however, all other policies and guidance from the London Plan not included in the Local Plan are to be considered part of the Local Plan. Paragraph 3.19 sets out that the Local Plan is supported by an Open Space Study (2021).
Proposed Change	No change is considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	470
Title	LP53 Protection and Enhancement of Green and Blue Infrastructure
Number	Policy 64

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	It is unsatisfactory that the promised Open Space Strategy which would, as stated in the Pre-Publication version (paragraph 21.8), 'provide details as to how open spaces in Wandsworth can be enhanced and made more accessible', has been dropped. Neither the Open Space Study and Report (which have now been added to the Evidence Base), nor the policies set out here constitute a strategy. This is especially regrettable since the Infrastructure Delivery Plan (IDP) acknowledges that Wandsworth falls far short of Field in Trust (FIT) Guidelines on amounts of Natural and Semi-Natural, and Amenity Greenspace, and that several wards fall short of the Guidelines for Parks and Gardens
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The sentence referenced to was removed as the Strategy, whilst anticipated at the time to have been finalised, is still being drafted. The Open Space Study provides several recommendations for how Wandsworth can help improve its area of open space deficiency and the Local Plan, through it's policy requirements aims to address these deficiencies.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	471
Title	LP54 Open Space, Sport and Recreation
Number	Policy 65
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP54 Open Space, Sport and Recreation</i>

	<p>The Policy relies for its evidence base on the Playing Pitch Strategy, which dates from 2013 and has not been updated. But the IDP makes clear that provision for sport and recreation is deficient across the borough, and that in many cases what is provided is unsatisfactory in quality and poorly maintained. Nothing is said either here or in the IDP as to how those deficiencies are to be addressed.</p> <p>21.25. This paragraph simply repeats what is said in 21.13 with a few additions. One of the paragraphs should be deleted.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>An updated Playing Pitch Strategy is scheduled to go to the September Committee for approval.</p> <p>Local Plan SPD Planning Obligations sets out how the Council will acquire greater and better amounts of open space to help it become the Greenest Inner London Borough.</p> <p>Paragraph's 21.13 and 21.25 are considered appropriate.</p>
Proposed Change	No change considered necessary

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	472
Title	LP55 Biodiversity
Number	Policy 66
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP55 Biodiversity</i> This policy fails to mention Policy G6 in the London Plan and its requirements for actions on deficiencies in access to nature. And while we recognise that the Environment Act did not receive the Royal Assent until November 2021, the provisions relating to Biodiversity Net Gain have been known for a considerable time. It is disappointing that steps have not been made in preparation.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The London Plan is part of the Local Development Plan and Policy G6s requirements will apply in Wandsworth development management. Paragraph 21.32 sets out the Council's intentions with regards Biodiversity Net Gain and the Environment Act.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	473
Title	LP56 Tree Management and Landscaping

Number	Policy 67
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP 56 Tree Management and Landscaping</i> Neither the policy nor the succeeding paragraphs refer to London Plan Policy G7, or to the requirement for the use of a recognised tree valuation method such as CAVAT145 or i-Tree Eco. We share the view of Wandsworth Tree Wardens that the report on trees issued last autumn was neither a policy nor a strategy.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	It is not considered necessary to refer to London Plan Policy G7 as part of LP56 as the emerging policy is considered to be both in conformity with the Policy G7 and is a more detailed policy appropriate for a Local Plan. Within Policy LP56 C(3) there is reference to CAVAT tree evaluation method.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	474
Title	Paragraph
Number	22.9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	22.9. The claim here that the London Plan includes proposals to increase capacity on SouthWest Rail routes is misleading. No such scheme is included in the London Plan's list of transport schemes at Table 10.1. It is true that Network Rail's South West Main Line Strategic Study notes the constraints around Queenstown Road and the potential for increasing capacity and resilience there; and that a further phase of its Wessex Suburban Strategic Study which will focus on the inner part of the suburban network. But no specific proposals have been developed.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Paragraph 22.9 explains that Crossrail 2 will provide underground improvements and increase the capacity on south-west rail routes, they are not individual projects.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	475
Title	Paragraph
Number	22.5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	22.5. The statement here that the 'community and voluntary sector will have a key role to play' is meaningless unless it states how they will be involved and engaged. The same applies to the statement in 22.13 about community involvement.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Council's Statement of Community Involvement sets out how the public, businesses and local groups can get involved in local and neighbourhood planning and the planning application decision-making process, and how the council will consult with them.

Proposed Change

No change considered necessary.

Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	476
Title	Implementation, Delivery and Monitoring
Number	22
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 22: Implementation, Delivery and Monitoring</p> <p>The policies set out in this chapter are unsatisfactory because they are far too thin to meet the claim in paragraph 22.1 that it provides 'an overview of the ways the Council will deliver and monitor the delivery and of the Local Plan's vision, objectives, area strategies and policies'. Our concerns on this are heightened by our long experience of how many developments have been approved in direct contravention of the policies set out in previous Plans.</p> <p>It is unsatisfactory also that the chapter has been padded out with paragraphs, such as 22.3, 22.16 and 22.17, that have nothing of relevance to say about either implementation, or delivery, or monitoring. They should be deleted.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Local Plan is considered sound. LP61 is a robust policy which sets out in detail how the Local Plan will be monitored and introduces the monitoring framework which was published alongside the Draft Local Plan. The background text is required to help provide further information.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	

Comment ID	477
Title	LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses
Number	Policy 70
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>LP 58 and 59 River Corridors; and Riverside Uses, including River-dependent, River-related and River Adjacent Uses</i> It is unacceptable that there is no attempt in either of these policies to cross-reference to the policies set in the London Plan; nor is there even any attempt to cross-refer to the Area Strategy for Wandsworth's Riverside.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	The London Plan is part of the Local Development Plan it is not considered necessary to include a cross reference to it. The Area Strategies and the Policies should be read in conjunction and there is no need to cross-refer.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	478
Title	Paragraph
Number	22.13
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	22.13. It is clearly correct that the site allocations in the area strategies are the key mechanism for delivery of the Plan as a whole; and that it is therefore crucial that landowners and developers engage with the Council as soon as possible. But as we have noted our comments on the area strategies, several of the site allocations are long-lived, and have featured in previous Plans, with no progress in their development. It is therefore unsatisfactory that the Plan makes no proposals as to how landowners and developers might be persuaded to engage with the Council in order to expedite proposals for development in accordance with the Plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is not the responsibility of the Local Plan to expediate development more so than it has.
Proposed Change	No change considered necessary.
Consultee Full Name	Battersea Society
Consultee Organisation Details	Battersea Society
Agent Full Name	
Agent Organisation Details	
Comment ID	479
Title	LP61 Monitoring the Local Plan
Number	Policy 72
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	LP61. Monitoring the Local Plan The monitoring arrangements outlined here are far too non-specific to be satisfactory. Precisely what will be monitored, and with what frequency, is not made clear. A monitoring framework is mentioned, but its nature and what it will cover are not specified. Similarly, there is no clarity as to what will be covered in the Council's Annual Monitoring Report (delivery of which has often been delayed in the past). The monitoring arrangements specified in the Plan must make clear that delivery of the goals, aims and objectives set out in Chapter 2 will be regularly monitored, and on what timescale; and that compliance with the policies and objectives set out in the rest of the Plan will be monitored similarly. Otherwise, neither the Council nor Wandsworth's residents will be able to judge whether the Plan is being delivered, if it is indeed sound, or whether amendments are needed.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy and the supporting text reference a number of means of monitoring the plan, many of which are already in place as required by Regulations.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	483
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Consultation on the Draft Local Plan: Publication Version Southside Limited Partnership</p> <p>Background</p> <p>We are instructed by our client, Southside Limited Partnership, a Joint Venture between Landsec and Invesco, to formally submit representations to the London Borough of Wandsworth ('LBW') consultation on the Draft Local Plan: Publication Version (Regulation 19).</p> <p>These representations follow on from the representations submitted on behalf of Southside Limited Partnership on the 'Pre-Publication' Draft Local Plan (Regulation 18) consultation, in March 2021. However, in accordance with national guidance, these representations focus on the Draft Local Plan's legal and procedural compliance, including the 'soundness' of the plan. Where relevant, reference is made to the four different tests of soundness, which require the Local Plan to be:</p> <ul style="list-style-type: none"> • Positively prepared - it provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities; • Justified - it is based on an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence; • Effective - it is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters; and • Consistent with national policy - to enable to delivery of sustainable development. <p>Our client has a long leasehold interest in the Southside Shopping Centre ('Southside') in Wandsworth Town Centre. The Freehold is held by the London Borough of Wandsworth. Southside was originally constructed in the late 1960s and launched as the Wandsworth Arndale in 1971. At the time, it was the largest indoor shopping space in Europe. Since then, the Centre has been expanded and the most recent major redevelopment was completed in October 2015, creating an additional 100,000 sq ft of retail and leisure space and delivering 14 modern double-height retail and restaurant units, a Debenhams department store, a new multiplex cinema and a second gym along Garratt Lane and Wandsworth High Street.</p> <p>Southside occupies 5.78 hectares of Wandsworth Town Centre, fronting Garratt Lane and Wandsworth High Street. It sits above the culverted River Wandle and adjacent to St Georges Park. The centre itself consists of over 600,000 sq ft of retail and leisure space across 90 units, including a large Waitrose, Gravity Active Entertainment and Cineworld. There are four residential towers located around the perimeter of the site. There is also a medium-rise residential building (known as Eliot and Wentworth Court) running along the spine of the centre, which contains approximately 200 residential homes which are all leased back to the London Borough of Wandsworth.</p> <p>Priorities & Objectives</p> <p>As set out in the March 2021 representations, our client's primary objective is to ensure that Southside remains fit-for-purpose in the short, medium and long-term and can continue to thrive as Wandsworth's Town Centre. In doing so, there will be an opportunity to deliver significant long-term, local community benefits to Wandsworth.</p>

	<p>Given Southside's highly accessible, sustainable and urban location, it is considered that the site has the potential to strengthen the Town Centre environment, with the provision of new homes, flexible retail, leisure and other town centre uses which are capable of responding to the changing nature of retailing and working.</p> <p>We welcome the opportunity to comment on the Draft Local Plan: Publication Version (Regulation 19) as a key stakeholder within the area. We support the strategic vision of the Local Plan and in particular, the policies that seek to support smart growth and redevelopment within Wandsworth Town Centre. The Draft Local Plan acknowledges the significant opportunities for transformation in the Town Centre and we agree with this approach. We wish to see greater flexibility to support continued growth and adaptation in this location.</p> <p>These representations begin by focusing on the Site Allocation for Southside, as set out on Pages 93-95 of the Draft Local Plan. We then comment on some of the more general policies set out in the Draft Local Plan. In accordance with paragraph 35 of the NPPF, these representations consider whether the Draft Local Plan has been prepared in accordance with legal and procedural requirements, and whether the policies are sound.</p> <p>Summary</p> <p>We welcome the opportunity to comment on the Draft Local Plan Publication Version (Regulation 19) as a key stakeholder within the area.</p> <p>Southside's highly accessible, sustainable and urban location offers the potential to deliver new homes, flexible retail, leisure and other town centre uses which are capable of responding to the changing nature of retailing and working. The amendments to the allocation within this Draft Local Plan proposed are considered critical to the successful future of Southside and thereby the continued economic growth and long-term sustainability of Wandsworth Town.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	484
Title	Paragraph
Number	4.158
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No

If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>i. This site description is appropriate and reflects the land title ownershi However, the full extent of the site ownership extends to 5.78ha and this should be updated.</p> <p>ii. We support the extension to the policies map site allocation boundary to include the southern portion of Southside</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Due to an administrative error this was not corrected and could be amended.
Proposed Change	<p>Amend the wording in paragraph 4.158 as follows:</p> <p>Site Area: 5.3978ha</p>
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	485
Title	Paragraph
Number	4.159
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	

	<p>iii. Adapting to the changing market is key to the long-term success of Southside as a town centre location. This change is being driven by a number of key macro trends, such as: urbanisation, climate change and the rapid rise of e-commerce. The pace of change, further accelerated by the Covid-19 pandemic, means that our existing retail spaces need to adapt to remain relevant as attractive places for people to spend time. Planning policy must allow sufficient flexibility to respond to these changing market conditions.</p> <p>iv. We are supportive of the re-wording of the site allocation, which is supportive of flexible retail, leisure, residential and other town centre uses.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changes required
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	486
Title	Paragraph
Number	4.160
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>v. We are supportive of the development considerations set out in this site allocation and feel the land uses identified will assist in ensuring the long-term success of Southside.</p> <p>vi. It is noted that the site allocation has been amended to remove the word 'inclusive' and this is supported.</p> <p>vii. We are supportive of the flexible approach to retail space. This is important to support the long-term success of the Town Centre.</p> <p>viii. We request that the development considerations are also accepting of the comprehensive redevelopment of the site, should this be required in order to facilitate development opportunities in the long-term, whilst supporting Southside as a town centre location.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. The current wording is considered sound and would allow for comprehensive redevelopment of the site.
Proposed Change	No change considered necessary.

Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	487
Title	Paragraph
Number	4.161
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>ix. We are generally supportive of this design requirement and would seek to provide enhanced public realm and active ground floor uses as a component of any future redevelopment proposal.</p> <p>x. It should be clarified within the policy text that the requirement to provide a new public square within the site will only be required where it is commensurate to the scale of development proposed, for example through large scale, comprehensive redevelopment. Therefore, the following amendment to the wording is recommended:</p> <p><i>“Development should respond positively to the site’s proximity to King George’s Park through improved public realm and creation of active ground floor uses. Where commensurate to the scale of development proposed, a new public square to the north of the site should be provided, which will build off the opportunities presented by the proposed improvements to the Wandsworth Gyratory system and the regeneration of the Ram Quarter. This public space will provide a key focal point for the town centre.”</i></p> <p>xi. Active frontages are vital to successful placemaking and we are supportive of the principle of this design requirement.</p> <p>xii. It is important that this policy does not stifle potential future redevelopment of Southside, to provide alternative active, outward facing town centre uses across the site. We recognise that, as suggested in our previous representations, an amendment has been made to reflect the distinction between the primary frontages of Garratt Lane and Wandsworth High Street, and the existing internal frontages of the Shopping Centre.</p> <p>xiii. We recognise that a balance should be achieved between the introduction of further tall buildings and minimising visual disturbance on the surrounding Conservation Area. This includes giving careful consideration to building heights across the site and ensuring that street frontages are articulated to minimise bulk, scale and massing.</p> <p>xiv. In accordance with national planning policy, new development should seek to maximise the scale, form and density of the site given the town centre location. There are already tall buildings in this location (Sudbury House, for example, extends to 70.85m in height), so the introduction of further tall buildings here will not fundamentally change the character of the area, or detrimentally impact the townscape (please refer to paragraphs xix to xxi below).</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	<p>Comments noted. The existing wording is considered sufficiently flexible to allow a new public square to come forward as part of a redevelopment but not necessarily as part of minor improvements. The details of which would be assessed at the development management stage.</p> <p>The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'restore' area as per the characterisation assessment of the UDS. The character profile notes that the Southside area has a low sensitivity and potential for taller buildings around King George's Park, as long as they positively address the park and are softened with trees. The strategy for the area is to restore the existing character and ensure future growth reinforces existing character. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	488
Title	Paragraph
Number	4.162
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xv. We are supportive of this requirement and would relish the opportunity to further strengthen links across the site and improve the relationship with the River Wandle, where possible. Public realm and permeability through the site should be considered imperative to any emerging development proposals and should be considered on a site by site basis, as, the planning benefit should be commensurate with the achievable scale of development.</p> <p>xvi. We are supportive of improvements to the pedestrian environment and would seek to improve links to neighbouring streets as part of any future redevelopment opportunity. However, in accordance with national policy, consideration should be awarded to the likely deliverability of pavement widening along a key route on the gyratory system. The policy should therefore be amended to clarify that an increase in pavement width should be sought, "if possible".</p> <p>xvii. The planning benefit should be commensurate with the achievable scale of development.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. The wording of para 4.162 is considered sound. An increase in the width is stated as being sought and not required. An increase in pavement width in this location would be important to deliver the improved active travel environment which is a key part of the vision and Anchor for Change.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	489
Title	Paragraph
Number	4.163
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	xviii. We are supportive of this requirement and would seek to improve the living conditions of existing and future residents as part of any future comprehensive redevelopment proposal; this would include the appropriate provision of both private and public amenity space.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	

Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	490
Title	Paragraph
Number	4.164
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xix. We are supportive of Southside being identified as an area with opportunities for tall buildings. However, we question the appropriateness of only part of the site being identified, as the approach does not seem to take into account the existing tall buildings to the north of the site where buildings extend to 70.85m in height (Sudbury House), and where the site is most connected to public transport.</p> <p>xx. Further, there are tall buildings immediately to the north of the site including one (outside of the land ownership boundary) with planning permission for 36 storeys (Ram Brewery). Therefore, the introduction of further tall buildings here will not introduce new elements that fundamentally change the character of this area.</p> <p>xxi. The image shown below on page 8 indicates the built and consented tall buildings on the site and in the immediate vicinity. It is clear that a number of these tall buildings have not been taken into account within the urban design analysis and subsequent heat map (which is also set out on page 8). The proposed 20 storey maximum has not taken into account the existing environment and is unreasonably restricting in a location suitable for tall buildings.</p> <p>xxii. In addition, we do not believe the inclusion of a cap on tall building heights is in accordance with the London Plan. The policy is inflexible and in its current format, precludes taller buildings irrespective of appropriate justification, such as the facilitation of regeneration opportunities.</p> <p>xxiii. As emphasised in the London Plan, tall buildings can facilitate regeneration opportunities, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are wellconnected by public transport and have good access to services and amenities. The London Plan recognises that tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. We do not feel this approach is reflected in the current Draft Local Plan. In order to be consistent with London Plan policy, we request that the approach to tall buildings is applied flexibly here, taking into consideration the way in which tall buildings can facilitate regeneration opportunities, contributing to new homes and economic growth.</p> <p>xxiv. In addition, the urban design analysis undertaken to inform this policy has not taken into account influential external factors such as Daylight, Sunlight and Overshadowing and the fact that there are already tall buildings on the site. Given a full analysis is yet to be undertaken makes it apparent that applying cap heights in this location, almost certainly rendering any redevelopment proposal unviable, would be highly inappropriate at this stage.</p>

	<p>xxv. As such, we request that the heights identified within the relevant policies are used as a guide in these locations. This would be in line with the approach taken by other London boroughs where the Local Plan has recently been adopted.</p> <p>xxvi. As noted in paragraphs xxii to xxv, we do not believe that the application of a building height cap is in accordance with the London Plan. The policy is inflexible and in its current format, precludes taller buildings irrespective of appropriate justification, such as the facilitation of regeneration opportunities.</p> <p>xxvii. In addition, the urban design analysis undertaken to inform this policy has not taken into account influential external factors such as Daylight, Sunlight and Overshadowing and the fact that there are already tall buildings on the site. Given a full analysis is yet to be undertaken makes it apparent that applying cap heights in this location, almost certainly rendering any redevelopment proposal unviable, would be highly inappropriate at this stage. The policy wording should be amended to allow for consideration of factors when determining maximum building heights.</p> <p>xxviii. Furthermore, Policy D3 of the London Plan states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The London Plan states that where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. We would question, therefore, the appropriateness of applying the mid-rise policy to the north of the site, where there is greatest connection to jobs, services and infrastructure, and where there are existing tall buildings.</p> <p>xxix. The proposed approach to define mid-rise buildings reflects a new approach and methodology in informing the tall buildings policy. As such, it is considered that further consultation on this draft policy is undertaken prior to adopting the Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'restore' area as per the characterisation assessment of the UDS. The character profile notes that the Southside area has a low sensitivity and potential for taller buildings around King George's Park, as long as they positively address the park and are softened with trees. The strategy for the area is to restore the existing character and ensure future growth reinforces existing character. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p> <p>Design-led optimisation means ensuring that development is of the most appropriate form and land use for the site that responds to a site's context and capacity for growth. The sites context has been reviewed in the UDS, that has informed the HELAA, and the massing shows the Council's preferred approach as a result.</p> <p>Extant permissions and existing buildings have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	491
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	xxx. We are supportive of the principle of Policy PM2 which sets out the Wandsworth Town based policy. We are supportive of future linkages between King Georges Park, Garratt Lane and the Ram Brewery, as well as the overall enhancement of the pedestrian environment at Southside. xxxi. We are highly supportive of the Council's ambitions to work with TfL and other infrastructure providers to improve the overall pedestrian environment surrounding Wandsworth Town Centre and particularly the proposed implementation of the Wandsworth Gyrotory System and supporting public realm improvements.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby

Agent Organisation Details	Partner Montagu Evans
Comment ID	492
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xxxii. Policy LP4 identifies locations suitable for tall buildings in Appendix 2. We are supportive of Southside being identified as an area with opportunities for tall buildings.</p> <p>xxxiii. We wish to express concern towards part D of Policy LP4, which states that “proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area”.</p> <p>xxxiv. As noted in paragraphs xxvi to xxix, we do not believe that the application of a building height cap is compliant with the approach encouraged by the London Plan. The policy is inflexible and in its current format, precludes taller buildings irrespective of appropriate justification, such as the facilitation of regeneration opportunities. It is essential that there is sufficient flexibility within policy to consider the potentially far-reaching benefits of regeneration, including through improvements to existing housing stock for example.</p> <p>xxxv. To be consistent with London Plan policy, we request that the approach to tall buildings takes into consideration the way in which tall buildings can facilitate regeneration opportunities, contributing to new homes and economic growth, particularly in order to make optimal use of sites. It may be appropriate for the heights currently proposed within the Draft Local Plan to be considered as a guide for developments, however, it is not appropriate to apply a height cap, immediately disregarding the wider site specific considerations outlined above. The policy wording should be changed accordingly.</p> <p>xxxvi. In addition, the urban design analysis undertaken to inform this policy has not taken into account influential external factors such as Daylight, Sunlight and Overshadowing and the fact that there are already tall buildings on the site (please refer to paragraphs xxii to xxv). Given a full analysis is yet to be undertaken makes it apparent that applying cap heights in this location, potentially rendering any redevelopment proposal unviable, would be damaging at this stage.</p> <p>xxxvii. Furthermore, Policy D3 of the London Plan states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The London Plan states that where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. We would question, therefore, the appropriateness of applying the mid-rise policy to the north of the site, where there is greatest connection to jobs, services and infrastructure, and where there are existing tall buildings.</p> <p>xxxviii. The proposed approach to define mid-rise buildings reflects a new approach and methodology in informing the tall buildings policy. As such, it is considered that further consultation on this draft policy is undertaken prior to adopting the Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.

	The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA).
Proposed Change	No changes considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	493
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xxxix. We are supportive of mixed and balanced communities; however, it is imperative that the quantum and mix of affordable housing is determined on a site by site basis. Consideration should be awarded to site context, local housing need and viability when determining the appropriate provision, as well as the benefits of regeneration.</p> <p>xl. It is noted that the London Plan supports flexibility for tenure mix provided it includes a minimum of 30% Low-Cost Rent and 30% Living Rent or Shared Ownership. This same flexibility should be applied in the Wandsworth Local Plan to maximise affordable housing delivery on appropriate sites. It is also considered that the thresholds set out in this policy should relate to habitable room measures, in accordance with the London Plan, to incentivise the delivery of larger affordable homes where appropriate.</p> <p>xli. It is recognised that Policy LP23 has been amended to limit the requirement for viability evidence to those circumstances which are specified in the London Plan and to measure affordable housing in habitable rooms.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy clearly sets out the Council's requirement for a provision of 50% low cost rented housing in accord with the London Plan ambition, and its tenure split, set out at policies H4 and H6. Evidence suggests that this is a realistic target. Changes are made to the policy to seek a balance of intermediate products based on the low-cost rent element achieved.</p>

	Further, the plan should be read as a whole. Criterion (e) of LP24 ensures that the policy is applied on a site by site basis and considers context, need and viability. First Homes are required to be sought through national guidance. The housing mix sought in policy LP23 is in accordance with the London Plan. Habitable rooms are mentioned in para 17.16.
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	494
Title	LP24 Housing Mix
Number	Policy 35
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xlii. We are supportive of mixed and balanced communities; however, it is important that housing mix is determined on a site by site basis, taking into account site context, housing need and market demand and viability when determining the appropriate mix.</p> <p>xliii. We acknowledge that the Local Plan Consultation Statement clarifies that this policy will be applied flexibly to ensure the schemes appropriately respond to the specific circumstances of the site.</p> <p>xliv. It is also acknowledged that the policy has been updated to take into account current evidence in relation to housing need. This is supported.</p> <p>xlv. Consideration should also be given to the proposed mix of uses, range of tenures included and strategic aims to optimise housing potential on all sites in accordance with Policy H10 of the London Plan. In particular, this policy should acknowledge the need for an alternative mix in Build-to-Rent schemes (which are better suited to smaller unit sizes as set out in Para 4.31 of the GLA's SPG). It should also acknowledge the need to ensure larger 3 and 4 bed affordable homes ownership products can be made genuinely affordable to intermediate households. In view of the above, this policy may be more effective if prescriptive target mixes for Market and Affordable Home Ownership are removed in accordance with the approach set out in the Publication London Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	<p>Comment noted.</p> <p>Criterion (e) ensures that the policy is applied on a site by site basis and considers context, need and viability.</p> <p>The target mixes in the policy are derived from the Local Housing Needs Assessment and reflect the requirements of the borough for a range of housing. The other policies in the housing suite of policies seek to achieve the right mix of smaller and larger houses both for sale and rent. The tables in policy LP24 are not intended to be rigid (as explained in the supporting text) and decisions will be informed by criterion (e) of the policy.</p>
Proposed Change	<p>No change considered necessary</p>

Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	495
Title	LP30 Build to Rent
Number	Policy 41
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xlvi. We welcome the Council's support for Build to Rent as a tenure, however, it is imperative that the provision of affordable housing and housing mix within this tenure is considered on a site by site basis, considering the factors set out in Policy LP24 whilst also acknowledging that Build-to-Rent schemes are best suited to smaller unit sizes (as confirmed in of the GLA's SPG).</p> <p>xlvii. It is also important that there is flexibility for some or all of the on-site affordable housing to be provided as Discounted Market Rent (DMR) where appropriate. The inclusion of DMR can enhance management efficiency and the overall viability and deliverability of Build-to Rent schemes. It also provides opportunities to meet a wider range of housing need (for example, including those who are unable to rent privately but are unlikely to be prioritised for Affordable Rented or Living Rent housing) and to enhance equality and inclusiveness through integration of housing types. The inclusion of DMR in Build to Rent schemes accords with the National Planning Policy Framework, National Planning Practice Guidance, the Publication London Plan and the GLA's Affordable Housing SPG (the policies of which were developed following extensive consultation with the Build to-Rent development and investment industry). Enabling some or all the affordable housing to be provided as Discounted Market Rent will not prejudice the ability for discounts to be set at a range of genuinely affordable levels, including that equivalent to London Living Rents.</p> <p>xlviii. Policy should include flexibility for the range of discounts to be agreed on a site-by-site basis, considering the factors set out in Policy LP24. If a target tenure mix is prescribed in policy, this should reflect the widely accepted notion that Build to Rent is less viable than conventional sale due to its improved affordability and long-term maintenance/placemaking investment. In view of this, the Publication London Plan provides flexibility for the rental levels to be agreed provided at least 30% of homes have rents equivalent to (or lower than) London Living Rents. This approach should be considered in the Wandsworth Local Plan. As currently reflected, the affordable housing requirements set out in Draft Policy LP30 would have a larger financial cost than those required for higher value private sale by Policy LP24. The target level of affordable housing may, therefore, need to be reduced to ensure Build to Rent schemes can remain viable in delivery, unless greater flexibility is included for a site by site approach.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.

	<p>Policy LP30 has a direct link to Policy LP24, where criterion (e) specifically refers to contextual information which may indicate deviation from the policy requirements. Sufficient flexibility is provided in the criterion A.3 by the word, 'should'. This allows for deviations to exist where they can be justified.</p> <p>Part A.3 of the policy provides a cross reference to LP24 which seeks the same housing mix in new housing developments. Sufficient flexibility is provided in the criterion by the word, 'should'. This allows for deviations to exist where they can be justified.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Ms Janet Kidner
Consultee Organisation Details	Development Director Landsec
Agent Full Name	Guy Bransby
Agent Organisation Details	Partner Montagu Evans
Comment ID	496
Title	LP42 Development in Centres
Number	Policy 53
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>xlix. We are supportive of Southside's allocation as a Core frontage, whereby proposals for new retail uses and active frontages. We are supportive of the amendment to permit a greater degree of flexibility over the use of retail units in core and secondary frontages. We believe in the long-term success of retail, however, where part F.3 suggests conditions may be applied to planning permission to restrict specific uses, it should be noted that this should be subject to demand and commercial viability.</p> <p>I. We are broadly supportive of the proposed policy wording. We are supportive of part D which stipulates that high-density mixed-use development, including residential, will be supported in appropriate locations as identified within the associated Site Allocations. We are also supportive and agree that development in the Town Centre must ensure that the unit is fit for purpose and viable in the long-term.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	Support noted. The use of conditions will be subject to specific sites and their context and will necessarily include consideration of commercial viability, alongside various other factors (e.g. the performance of the frontage as a whole, more up-to-date data on the needs of the borough, etc), as part of the legal agreement which underpins them. It is not considered necessary to add such reference within the Local Plan.
Proposed Change	No change considered necessary
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	497
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Consultation on the Wandsworth Publication Draft Local Plan (Regulation 19) Representations made on behalf of SGN Mitheridge</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012</p> <p>Quod is instructed by SGN Mitheridge to submit representations to the Wandsworth Publication Local Plan Regulation 19 (hereby the "Reg 19 Plan"). These representations are submitted within the consultation period that runs from 10th January to 28th February 2022.</p> <p>SGN Mitheridge Limited are the site owner and developer of the Wandsworth Gasworks and Calor site. Common Projects are managing the project on their behalf. Where reference is made to Common Projects within these representations, Common Projects is acting on behalf of SGN Mitheridge Limited.</p> <p>1 Scope of the Representations</p> <p>Common Projects has been in pre-application discussions with the Council, Greater London Authority and Council Design Review Panel since 2020 relating to the submission of a hybrid planning application to redevelopment the Wandsworth Gasworks site and land currently occupied by Calor.</p> <p>The land which will be subject to a planning application is identified in Figure 1 below, and we refer to this site as the Gasworks site within our representations.</p> <p>The representations consider the soundness of the Wandsworth Publication Draft Local Plan (Regulation 19) and specifically those policies that relate to the Gasworks site. Our comments also relate to the wider Site Allocation WT4 which includes the Gasworks site and adjacent land.</p> <p>2 Executive Summary</p>

Quod raises several concerns with the Reg 19 Plan as policies within it do not meet the tests of soundness. We have identified mitigating measures, through modifications, to make the policies sound, and would welcome the opportunity to work with Wandsworth Council (the 'Council') to address these prior to submission to the Secretary of State.

The principal concern is that the Council has taken an overly mechanistic approach to building heights across the borough without undertaking the necessary evidence-based assessment required by London Plan Policy D9. The restrictive approach that the Council is undertaking is summarised within the 2021 Whole Plan Viability Assessment "***The revised tall buildings policy is intended to strictly apply so that proposals exceeding the appropriate height range will be refused on design grounds***"¹. This approach could render site allocations undeliverable and therefore additional flexibility to the application of policy is required.

The very detailed and intricate tall and mid-rise building zones and buildings heights proposed are not justified. Further, in respect of the proposed heights and tall building zone applied to Site Allocation WT4 Gasholder Cluster, it is apparent that the limited evidence-based assessment has not been carried across into the maps contained within Appendix 2. These maps are also inconsistent with the pre-application advice received from the Council since 2020.

Policy LP4 Tall Buildings requires forty criteria to be assessed for tall building proposals (seven storeys and above) which is not a succinct approach. It results in duplication. The policy does not recognise that there may be some circumstances, where compliance with the plan (when read as a whole) requires flexibility to be applied for building heights and zones at the determination stage of a planning application. Without modification, the approach to building heights may undermine the deliverability of the plan as a whole.

Policy

Reason for non-conformity

Strategic Policies

We believe that Policy LP4 Tall Buildings and Appendix 2 should be included within the strategic policy schedule due to the strategic implications that this has on the plan as a whole. The deliverability of the housing capacities resulting from LP4 should be viability tested taking into account other strategic policies of the Reg 19 Plan.

Succinct Plans

The NPPF requires succinct plans which avoid duplication. The Reg 19

Plan contains duplication across several policies. It is an important planning principle that the development plan should be read as a whole and therefore duplication across policies should be avoided. Design guidance duplication occurs in Chapter 8 Placemaking – Area Strategies; Chapter 4 to 12 Area Strategies including the Site Allocations; and Chapter 14 Achieving Design Excellence. Inconsistencies also occur between the Reg 19 Plan, the Council's 2021 Arup Urban Design Guide (the 'UDS 21') and the Wandle Delta Masterplan SPD 2021.

Early and Effective

Engagement

The NPPF requires plans to be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees. The Reg 19 Local Plan consultation is the first opportunity that stakeholders have been able to review and comment on the Council's proposed approach to tall buildings (LP4 and Appendix 2). The main source of engagement we have had to date is through the pre-application process, where feedback we have received from officers as well as the council's expert design panel is entirely in contradiction to the draft plan. Given the wider implications of this policy, it is considered that earlier and more effective engagement should have been undertaken.

A summary of our objections is set out in Table 1 below. Table 1: Summary of Reg 19 Plan Objections

SDS1 - Spatial

The policy has not been positively prepared or justified. The housing target for the plan period should be revised to 29,250 homes to accord with Table 4.1 of the London Plan.

There is no explanation how the Council has estimated its housing capacity for Wandsworth Town of 3,510 homes and what role Site WT4 Gasholder Cluster plays in contributing to this capacity.

Development Strategy

2023 - 2038

Chapter 3 PM1

Whilst Common Projects support the statement at paragraph 3.11 and PM1 (B) Area Strategy and Site Allocation compliance, there is no explanation whether this policy applies to LP4 and Appendix 2. Further clarification is required.

PM2, Map 4.1 Spatial

The policy is not justified due to inconsistencies with the Council's evidence base.

Area Map

Map 3.2

Site

Common Projects supports the allocation of the Gasworks Cluster as a development plan allocation.

Allocations

Site Allocation WT4

Unlike the recently adopted Wandle Delta Masterplan SPD, the Reg 19 site allocation fails to recognise the significant constraints of the site which must be addressed prior to bringing the site forward. The GLA have agreed that these costs (c.£20M) are onerous and meet the policy tests of the London Plan Footnote 59.

LP4 - Tall Buildings

The policy is not justified or effective. It is inconsistent with Policy D9 of the London Plan. Whilst it proposes very detailed tall and mid-rise building zone boundaries and heights which must be adhered to, it has not been subject to the analysis required by LPD9 Part (c) to justify such a restrictive approach. The zones and heights are not therefore justified by the UDS 21. Unlike the recently adopted Wandle Delta Masterplan SPD, the Reg 19 approach is inflexible as it does not permit heights beyond those prescribed or buildings at heights outside of the prescribed zones. Flexibility is necessary given the broad assumptions undertaken in the evidence base, and the overly constrained zones and heights applied in policy – particularly as a result of the Council's additional layer of control in respect of the introduction of Mid-Rise buildings which unnecessarily apply the controls of London Plan D9. Site Allocation WT4, the most significant urban site in the town centre of 2.81ha is subject to two different height parameters of 6 and 7-10 storeys. The heights and zones are based upon the high-level design analysis of the UDS21. LD4 does not allow for alternative design solutions to be considered which overly constrains the site. Common Projects has been engaged in pre- and Appendix 2

4

application discussions with the Council since 2020 regarding

redevelopment of site WT4. The site has been subject to detailed

townscape and heritage analysis; design reviews and officer reviews. It has been agreed through this analysis that heights above 6 storeys in the mid-rise zone, and heights above 7-10 storeys are acceptable at WT4. The draft Reg 19 Plan conflicts with this advice, and the site-specific

analysis undertaken. It also conflicts the analysis undertaken in the

Wandle Delta Masterplan SPD. The mid-rise zone should therefore be deleted and replaced with the Tall Building Zone and heights should be increased to reflect the pre-application advice of the Council.

Common Projects has tested the effect of LP4 Appendix 2 (zone and heights) which could limit development to a residential capacity of c.370 homes across that part of the WT4 allocation that it controls. This would broadly correlate to the indicative capacity of 481 homes across 4 – 10 storeys across the whole WT4 site set out in the Wandle Delta Masterplan SPD (2021) which our client made substantial representations to.

Common Projects has tested the deliverability of 370 homes against the Council's affordable housing policy, and the results indicate that at the heights prescribed (and the resulting residential capacity) this would raise serious questions about the deliverability of the allocation without the flexibility required, due to the existing abnormal costs. The proposal could not viably deliver any affordable housing. It is therefore necessary to modify Policy LP4 to permit flexibility in order to meet other policies within the plan.

Policy LP23

-

To ensure consistency with the London Plan and National Policy.

Affordable Housing

Policy LP24 – Housing

To ensure consistency with the London Plan.

Mix

Policy LP30 – Build to

To ensure consistency with LP Policy H11 and National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-

20180913 and to include flexibility as required by the Council's whole plan viability statement.

Rent

Policy LP38 - Affordable and Open Workspace

To ensure consistency with the London Plan and National Policy.

3 SGN Mitheridge Limited

Mitheridge and Scotia Gas Network (SGN) have formed a Joint Venture Partnership called SGN Mitheridge Ltd to bring forward the redevelopment of the Wandsworth Gasworks site on the Wandle Delta. It is an exciting opportunity and one that will help complete the transformation of the River Wandle between the Ram Brewery and the River Thames. Common Projects is managing the project on their behalf.

SGN first engaged with Wandsworth Council in 2013 to create an appropriate policy framework for decommissioning the gas works and the realisation of a new residential quarter for Wandsworth Town. SGN has subsequently taken part in Wandsworth's Local Plan review at each stage of consultation to inform the current adopted development plan policy for the site which promotes residential led mixed-use development.

The Council adopted a draft SPD for the Wandle Delta in 2021, which included the SGN Mitheridge site. Quod, on behalf of the Joint Venture Partnership, made extensive representations to this document. These representations remain relevant to the Reg 19 Local Plan as the Council did not fully take into account London Plan policy; comments with regards to the deliverability of sites and the absence of viability testing; and the evidence base which specifically related to the complex delivery of former gasworks sites for housing led regeneration. At the same time as consulting on the Wandle Delta SPD, the Council consulted on the Regulation 18 Local Plan. Quod made representations to this document.

SGN has also worked alongside National Grid to inform policies of the London Plan. Policy H1 of the adopted London Plan allocates gasworks sites as strategic sources of housing as a result of the engagement undertaken by the utility companies at the London Plan EIP.

SGN demonstrated its desire to assist Wandsworth Council in the delivery of the Wandle Delta local plan objectives by revoking its Hazardous Substances Consent in 2019. The Calor site, which is now owned by SGN Mitheridge, still benefits from a Hazardous Substances Consent, which impacts the development capacity of the Wandle Delta, but can be revoked with a successful grant of planning permission for redevelopment of the site.

Through the joint venture with Mitheridge, a partnership now exists to realise the policy requirements of the Wandsworth / London Plan for this site. The partnership is working towards the submission of a hybrid planning application in summer 2022 through its appointed partner Common Projects.

Common Projects will lead the exciting journey to finally transform this strategic, but underused, brownfield site which sits centrally within the Wandle Delta. It forms an integral link between the Ram Brewery development and the River Thames and has the potential to deliver many public benefits for Wandsworth Town.

4 Challenges

Common Projects welcomes the Council's acknowledgement that there will be challenges to delivery at the Gasworks Cluster. However, the Reg 19 Plan (unlike the Wandle Delta Masterplan) does not yet recognise the constraints associated with utilities restrictions, easements, HSE guidance, and multiple land ownerships. The Reg 19 Plan does not recognise the limitations of contaminated sites and specifically the cumulative constraints which arise specifically with the development of a Gasworks site which will have an impact on deliverability, site capacity and viability.

The exceptional nature of Wandsworth Gasworks results from years of gasworks production and gas storage. There is a need for substantial decontamination to address the contamination of the soil and groundwater. Some materials may have been buried in underground tar wells, liquor wells, pipes and purifier beds and will require removal. The major contaminants (hydrocarbon sludges, spent oxide wastes, ash and ammoniacal recovery wastes) will need to be remediated and removed from the site.

Rationalisation of the existing pressure reduction station, and underground gas mains will also be required as will removal of underground structures and obstructions, and demolition of the existing holder. The site also contains a backfilled canal which previously brought barge ships into the site.

The implications of these complex site constraints are twofold: -

Financial viability: The exceptional costs associated with site remediation/ constraints, drives the need for density on a viability level.

Spatial / developable area: It is also the specific spatial constraints which can drive the need for both height and the associated non-linear/orthogonal approach to massing that bring with it larger/better open spaces at ground.

The gasholder basin is a spatial constraint. If it is a fixed spatial constraint because we believe that it should be retained (on sustainability/embodied carbon/historic reference grounds). It joins the River Wandle, railway, National Grid head house, pressure reduction system, easements and offsets as an array of spatial constraints that dictate the figure ground of any future masterplan.

These constraints prevent a blanket courtyard typology approach, regardless of whether that is or is not considered to be the appropriate design response (which in itself has not been justified). This reduces/dictates developable area at ground, necessitating both the height of certain plots and the circular approach to the master planning.

5 Test of Soundness

Common Projects broadly welcomes the approach taken by Wandsworth Council to renew its local plan and add further guidance on how it seeks to transform its town centres into major assets for the Borough.

To meet the tests of soundness, the Regulation 19 Plan must remain in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. It must also meet the tests set out in paragraph 35 of the National Planning Policy Framework ('NPPF') being positively prepared; justified; effective; and consistent with national policy. The tests will be applied to non-strategic policies in a proportionate manner.

Section 38(6) of the Planning and Compulsory Purchase Act 2004, taken with Section 70(2) of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. For this reason, it is imperative that the development plan is fit for purpose and sound.

The NPPF requires plan-making to achieve the following2:-

Succinct and up-to-date plans (paragraph 15)

Be prepared positively, in a way that is aspirational but deliverable (paragraph 16)

Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees (paragraph 16)

Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant) (paragraph 16)

Our representations consider the soundness of the Reg 19 Plan and specifically those policies that relate to the Gasworks site, and Site Allocation WT4 as a whole.

7 Succinct Plans

The NPPF requires succinct plans which avoid duplication⁵. The Reg 19 Plan contains significant duplication across policies. It is a fundamental planning principle that the development plan should be read as a whole and therefore duplication across policies should be removed.

The design guidance is unnecessarily duplicated in Chapter 8 Placemaking – Area Strategies; Chapter 4 to 12 Area Strategies including the Site Allocations; and Chapter 14 Achieving Design Excellence. Inconsistencies occur where there is reference to the Council's UDS 21.

8 Early and Effective Engagement

The NPPF requires plans to be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees.

In our opinion, effective engagement has not happened. SGN has been involved in discussing the gasworks site with the Council since 2013, and Common Projects have been involved in detailed pre-application discussions since 2020. Extensive dialogue across all planning matters has taken place, including abnormal costs and site constraints. Common Projects was first informed about the approach taken in Appendix 2 (height parameter zones) in November 2021. These representations are the first opportunity to make formal comments.

The main source of engagement we have had to date is through the pre-application process, where feedback we have received from officers as well as the council's expert design panel is entirely in contradiction to the Reg 19 Plan. Given the implications of the policy approach to heights, it is considered that earlier and more effective engagement should have been undertaken.

9 Flexibility in Plan Making

The NPPG (Paragraph: 001 Reference ID: 61-001-20190315, Revision date: 15 03 2019) confirms that the plan-making framework allows flexibility in the way policies for the development and use of land are produced.

Whilst Common Projects support the statement at paragraph 3.11 of the Reg 19 Plan that when determining planning applications, consideration of principles applied to site allocations will be important, subject to an up-to-date assessment of need and the agreed viability position of the scheme to ensure that site allocations remain deliverable, there is no explanation if this statement applies to LP4. We believe that it should.

Common Projects also support PM1 (B) which states that proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy or Site Allocations on neighbouring sites. There is no explanation if this policy applies to LP4 and Appendix 2. Further clarification is required.

21 Conclusion

	<p>On behalf of Common Projects, Quod reserves the right to add to or amend their representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level.</p> <p>Given the extent of our representations, and the ongoing pre-application discussions being undertaken with the Council's planning department, we would welcome a meeting with the Council's policy team to resolve some of our concerns prior to submission of the Regulation 19 Plan. We would be happy to review our comments should the council be able to produce evidence and justification for the proposals.</p> <p>1 Whole Plan Viability Assessment January 2022, paragraph 1.47. 2 NPPF (2021) Chapter 3 5 NPPF paragraph 15 and 16</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p> <p>The Whole Plan Viability Assessment has tested the cumulative impact of the Tall and Mid-rise buildings policy. The assessment concludes that the Reg 19 Local Plan is realistically deliverable. That is, its 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. Local Plan viability testing is necessarily generic, using a range of typologies and general development assumptions that are proportionate, utilising available data and importantly are not necessarily site specific. As is the case set out in guidance, and carried out by other local authorities in testing the delivery of their Local Plans and policies, the assessments are designed to test policy as opposed to being formal valuations of planning application sites at the planning application stage, normally carried out by the Valuation Office, Chartered Surveyors and Valuers. In this regard, the specific results of each typology may need to include additional section 106 obligations and other sites costs may allow for site mitigations that at this stage are unknown within the generic typology testing.</p>
Proposed Change	No change considered necessary
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	498
Title	Paragraph
Number	1.12

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>6 Strategic Polices</p> <p>Paragraph 1.12 of the Reg 19 Plan lists the strategic policies of the plan. This includes, inter alia, Policies SDS1 Spatial Development Strategy; PM1 Area Strategy and Site Allocations Compliance; and PM2 to 10 – Place-based policies for each Area Strategy.</p> <p>Policy LP4 Tall Buildings is not included, which we consider is an omission. Strategic policies are subject to full weight of the soundness tests³, and set out an overall strategy for the pattern, scale and design quality of places⁴ and strategic priorities. Given the impacts on the whole plan viability, we consider that the policy (and resulting housing capacities) should be subject to viability testing when considered against other policies within the plan, including affordable housing.</p> <p>3 NPPF paragraph 36 4 NPPF paragraph 20 and 21</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy LP4 is not considered to be a strategic policy in accordance with NPPF para 20.</p> <p>The Whole Plan Viability Assessment has tested the cumulative impact of the Tall and Mid-rise buildings policy. The assessment concludes that the Reg 19 Local Plan is realistically deliverable. That is, its 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. Local Plan viability testing is necessarily generic, using a range of typologies and general development assumptions that are proportionate, utilising available data and importantly are not necessarily site specific. As is the case set out in guidance, and carried out by other local authorities in testing the delivery of their Local Plans and policies, the assessments are designed to test policy as opposed to being formal valuations of planning application sites at the planning application stage, normally carried out by the Valuation Office, Chartered Surveyors and Valuers. In this regard, the specific results of each typology may need to include additional section 106 obligations and other sites costs may allow for site mitigations that at this stage are unknown within the generic typology testing.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	499
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>10 Policy SDS1 (A) Spatial Development Strategy 2023 - 2038 & Table 2.2 – OBJECT</p> <p>Policy SDS1 (A) sets a strategic target to provide a minimum of 20,311 new homes by 2038 (1,354 homes per annum for 15 years). We are concerned that this underestimates the housing need required by Table 4.1 of the London Plan which seeks 19,500 homes across ten years (1,950 homes per annum for 10 years). Extrapolated across the 15-year period this would require at least 29,250 homes.</p> <p>Supporting text to Policy SDS1 indicates that the Council has adjusted its figures due to the oversupply of housing completions achieved and forecast to be delivered up to 2026, however as these completions are not guaranteed, the Council should be seeking to exceed its minimum targets. It is not considered appropriate to manually adjust down the annual housing target required by the London Plan.</p> <p>This is particularly important as the Council has failed to deliver against the current target of 1,950 homes in the last three years (18/19 - 1,877; 19/20 – 1,359; 20/21 – 1,422)⁶ highlighting the challenges of meeting this figure.</p> <p>Table 2.2 'New Homes Distribution' indicates a capacity of 24,380 homes, which would represent a short-fall against the revised 15-year target of 29,250 homes based on the London Plan annual targets for Wandsworth. We consider that the minimum housing requirement should be revised to 29,250 homes.</p> <p>11 Policy SDS1 (B) Spatial Development Strategy 2023 - 2038 & Table 2.2 – OBJECT</p> <p>Common Projects support the identification of Wandsworth Town within Policy SDS1 'Spatial Development Strategy' as a location with a strategic economic role and/or opportunities for regeneration. The Council's capacity for new homes in Wandsworth Town is identified as 3,510 homes. Footnote 2 states that this capacity is derived from the Council's HELAA for the period 2023/24 to 2037/38.</p>

	<p>We have reviewed the HELAA and it is unclear how a capacity of 3,510 homes has been derived. There is no explanation if the capacity referred to in SDS1 Table 2.2 includes Site WT4, and if so what the indicative capacity of WT4 is? The Whole Plan Viability Assessment 2022 does not provide any further clarity on this query. We would welcome further explanation from the Council on this issue.</p> <p>In review of the Council's own evidence base: we note that the UDS 21 allocates Site Allocation WT4 within character Area G1, which it is identified as having low sensitivity whilst being a location with a higher probability of change, and therefore it is identified as a site with the highest probability for development capacity⁷. The supporting text states that these areas "are the most likely to have the greatest development capacity, with a high probability of change compared against a low sensitivity, including areas such as some estates in East Putney Residential, Battersea Residential and Tooting Residential; Wandsworth Town Centre; some industrial plots within the Wandle Valley; parts of Clapham Junction Town Centre and Balham Town Centre; and Nine Elms Opportunity Area".</p> <p>It would be useful to understand the anticipated site capacity for Site WT4, and what gross residential density has been applied, and if this is compatible to the policy expectations for a highly accessible town centre site. As a PTAL 4-6 site, and with an urban/central character using the former London Plan (2016) density matrix (Table 3.2), a density of 240 - 405 dwellings per hectare would be deemed appropriate, equating to a housing capacity of 674 – 1,138 homes for Site WT4. The Wandle Delta Masterplan SPD indicates a density of 481 homes (177 dwellings per hectare) at 4 to 10 storeys for a comparable site (the Gasworks Cluster). A density of 177 which would not be commensurate with the site characteristics set out within the UDS 21 evidence base which identifies the site as having the highest probability for development capacity.</p> <p>Please also see our objections in respect of Site Allocation WT4 and LP4 which promote an increased housing capacity for the WT4 Gasworks Cluster site. 6 Reg 19 Plan Table 2.3</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>First, the housing requirement figure of 20,311 is based on the London Plan requirement for Wandsworth to 2028/2029 and a combination of the small sites target and SHLAA sites, which reflects the Plan's suggested approach to meeting housing need beyond 2029.</p> <p>The figures in the plan at para 2.104 do, in fact, show a small deficit for the years 2019-2023, but this is more than compensated for by the years prior to 2019, when completions were at a higher rate.</p> <p>Housing completions and projections will be monitored throughout the plan period.</p> <p>The capacity for Wandsworth Town is derived from the HELAA, and site WT4 provides a proportion of this capacity. The HELAA, prepared in accordance with national planning policy guidance, sets out at section 2.5 the reasons why estimated development capacities for each individual site are not made public (and defines the approach in the remainder of part 2). Site estimates and the overall housing capacities for areas and the borough as a whole are established through a design-led approach to ensure that strategic London Plan targets for housing can be satisfied over the plan period. Individual sites will come forward over the plan period and will be able to establish much more effectively the housing numbers based on a detailed understanding of site-specific viability, deliverability and an assessment of the geographical and policy context.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford

Agent Organisation Details	Director Quod
Comment ID	500
Title	Site Allocations
Number	Map 3.2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Map 3.2 Site Allocations – Support Common Projects supports the allocation of WT4 as a site allocation. It comprises a strategic site for Wandsworth Town. The landowners have been engaged with the Council since 2013 to bring forward an appropriate policy framework for delivery of the site. This is a deliverable site allocation, which requires flexibility within the development plan as a whole, and in particular Policy LP4 to ensure its deliverability.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	501
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PM1. Placemaking – Area Strategy and Site Allocations Compliance – Comment</p> <p>Whilst Common Projects support the statement at paragraph 3.11 of the Reg 19 Plan that when determining planning applications, consideration of principles applied to site allocations will be important, subject to an up-to-date assessment of need and the agreed viability position of the scheme to ensure that site allocations remain deliverable, it is unclear if this statement applies to LP4. We believe that it should.</p> <p>Common Projects support PM1 (B) which states that proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy or Site Allocations on neighbouring sites. There is no explanation if this policy applies to LP4 and Appendix 2 and further clarification is required.</p> <p>The Whole Plan Viability Assessment advocates this approach. Paragraph 8.11 states that for future developments, principally retail and other town centre use developments (excluding offices), where the Reg 19 Local Plan may raise the risk of development being unviable, there may need to be provision for some flexibility to ensure a fully deliverable plan. This may include introducing flexibility in on-site and off-site developer contributions, and leaving the market to deliver the sites.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. To provide greater certainty, part B of Policy PM1 is proposed to be deleted as this is considered to repeat section 38(6) of the Planning and Compulsory Purchase Act 2004.
Proposed Change	<p>Amend Policy PM1 criteria B as follows:</p> <p>B. Proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy, or Site Allocations on neighbouring sites.</p>
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	502
Title	PM2 Wandsworth Town
Number	Policy 3

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	PM2. Placemaking – Limb A1(b); A5; B2 – Object We consider that limb A1(b), A5 and B2 should be deleted to avoid duplication.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The criteria of PM2 A5 and B2 is considered to be appropriate to Placemaking Policy PM2 as an appropriate signpost to those policies as part of an area strategy approach. However criteria PM2 A1 (b) is proposed to be deleted as it could cause confusion with the interpretation of Policy LP4 and criteria PM2 A5 which is how the approach to tall and mid-rise buildings should be applied.
Proposed Change	Amend criteria of PM2 A. 1. b. and policy numbering as follows: b. height and massing reflect local context, or conforms with the approach for tall buildings in Wandsworth Town;

Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	503
Title	Wandsworth Town
Number	Map 4.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Map 4.1 Spatial Area Map Wandsworth Town – Object</p> <p>Policy PM2A.6 requires development proposals to respect and enhance the views and vistas established in the UDS 21. Appendix I 'Views and Vistas of Interest' of the UDS 21 refers to a number of views for Wandsworth (I.2.21 G1 Wandsworth Town and Riverside) but there is no explanation how these vistas and views relate to those set out on Map 4.1 "valued view and vistas". Further clarification of this is required.</p> <p>Reg 19 Plan Map 4.1 Spatial Area Map: Wandsworth Town identifies 4 valued view and vistas. One of these views is located within this Gasworks site in a location inaccessible to the public. There is no explanation how this view has been derived as being valued. Further clarification of this is required.</p> <p>Map 4.1 identifies seven suggested locations for new public open space in the sub-region. For site WT4 the location for new public open space is identified as the proposed new public open space and proposed new route along the River Wandle. This appears to be unnecessary duplication and the annotation should be deleted. It also conflicts with the urban analysis for the site (by Wandsworth Council and Wandsworth's Design Review Panel) which supports the location of a tall building in the northwest corner of the site.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The policy is considered sound and helps enhance important views in Wandsworth but to ensure the correct ones are protected the policy could be modified to ensure there is greater clarity as to which views are considered as part of the development process.</p> <p>Both the 'proposed new public open space' and 'suggested location for new public open space' icons are considered necessary as the former is related to creation of the Wandle Path and the latter is suggestive of where an associated public open space could go.</p>

Proposed Change	Amend wording PM2 Wandsworth Town A(6) as follows: 'Development proposals will be required to respect and enhance the valued views and vistas established in <i>Map 4.1 Spatial Area Map: Wandsworth Town, the Urban Design Study (2021)</i> '
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	504
Title	WT4 Gasholder Site, Armoury Way, SW18
Number	Statement 3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>13 Site Allocation – Gasholder Cluster, WT4 Gasholder Site, Armoury Way, SW18 – OBJECT</p> <p>Reg 19 Site Allocation Gasholder Cluster WT4 Gasholder Site, Armoury Way, SW19 is the most central development site allocation for Wandsworth Town Centre, and the largest site within the</p> <p>Wandsworth SPD Masterplan. Whilst Common Projects supports the principal of the allocation, and in particular explicit recognition that the gasholder itself and the supporting infrastructure should be excluded from the calculation of existing floorspace, a number of concerns are raised.</p> <p>Policy Context</p> <p>It is useful to set out the Government's and Mayor of London's policy for the optimisation of accessible brownfield land, in particular former gasworks site in central locations well served by public transport. We enclose this information at Appendix 1 of this submission.</p> <p>We consider that the essential objectives of this policy have not yet been achieved within the emerging Site Allocation WT4. The WT4 allocation should also be informed by the Wandsworth Delta SPD Masterplan which we discuss below.</p>

Wandsworth Delta SPD Masterplan - 2021

Quod submitted representations to the Wandsworth Delta SPD Masterplan, and whilst a number of our specific requests to ensure consistency with the NPPF and London Plan were not incorporated into the final document by the Council, Quod were supportive of certain aspects of the SPD which recognised the constraints of delivery. The SPD also recognised that specific aspects of design could not be considered at SPD stage, and detailed analysis was required at the planning application stage.

The key aspects of the SPD which recognised these important points, and which we set out as bullet points below, are now absent from the WT4 draft allocation.

Para 2.2.12 – Land Use - It is important to note that Wandsworth Gasworks presents substantial delivery challenges in relation to a long history of gas production and storage. Substantial decontamination is likely to be required in relation to soil and groundwater.

Para 5.6.4 – Height, Scale and Massing - The SPD is not prescriptive in setting maximum heights or limits of what the Council consider to be appropriate height ranges. Instead, indicative appropriate height ranges are provided.

5.6.13/14 - Building height strategy - There are a number of key areas which are considered to be sensitive which will necessitate the careful moderation of proposals as appropriate (inc. Bell Lane Creek and River Wandle). Applications for tall buildings will be required to demonstrate that sensitivities have been considered and adequately addressed within proposals.

Para 5.8.2 - Viability and delivery - Given the industrial nature of the area a number of sites are likely to be contaminated and/or have services running through them. Further consideration will need to be given to each individual site/cluster to fully understand specific contamination and/or servicing issues, however these have been signposted in the site specific considerations section.

Para 5.8.10 – Gross capacity estimates - These capacity figures are intended to be indicative estimates, and should not be treated as minimum targets or maximum quanta. It is recognised that the capacities for individual sites will evolve through a detailed design approach on a site-by-site basis with reference to the viability and delivery considerations identified above.

Para 5.9.11 - Gasworks Cluster Delivery - In addition to the landownership challenges the site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas 'governor'. This area, along with others in the cluster may be subject to substantial decontamination, enabling and remediation costs which may have an impact on deliverability and viability. A combination of these factors may have an impact on deliverability, capacity and viability.

It is recognised that the SPD applies appropriate flexibility recognising that the heights and masterplans set out in the document are illustrative only, and do not set minimums or maximums. We consider that this is an appropriate approach as the document has not been viability tested and has not considered the development economic effects of the Council's affordable housing; CIL; s.106; industrial land requirements; remediation; railway arches; and ecological policies.

In accordance with the London Plan, the SPD recognises that a number of sites within the Wandle Delta are likely to be contaminated and/or have services running through them. Further consideration will need to be given to each individual site/cluster to fully understand specific contamination and/or servicing issues. Owing to this, the capacity figures are intended to be indicative estimates. It is recognised that the capacities for individual sites will evolve through a detailed design approach on a site-by-site basis with reference to the viability and delivery considerations identified in the document. The SPD recognises that a combination of these factors could have an impact on deliverability, capacity and viability.

The Reg 19 Local Plan now adopts the indicative height parameters set out in the SPD as prescriptive height parameters, without recognising the existence of significant site constraints (c.£20M), and without providing any flexibility in respect to the implementation of the policy. This combination is overly restrictive and could lead to a failure of delivery. As discussed below, we consider that the relevant text set out at paragraph 2.2.12; 5.8.2; 5.9.11 of the SPD should be included in the site allocation context section.

Application of National Policy and the London Plan to Site Allocation WT4

	<p>The site represents one of the only major and available developable sites in Wandsworth Town Centre, and therefore represents a key allocation in supporting Wandsworth and the wider borough's housing and economic needs across the next plan period. It is therefore unusual that the site allocation does not include a minimum quantum of residential homes deemed acceptable on this Site. A minimum housing capacity for WT4 would resolve the ambiguity between SD1 and the evidence base.</p> <p>We make some further detailed modifications below to ensure that the policy is sound.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The SPD is intended to be read together with the Local Plan. The Council's consultants for the Urban Design Study worked alongside the consultants for the Wandle Delta Masterplan to ensure proposed heights were design-led and appropriate for the area. The Masterplan has been reviewed as part of the Urban Design Study for its appropriateness in line with the UDS methodology in setting the building height ranges within the tall and mid-rise zones.</p> <p>Regarding land contamination, the site allocation is not considered to be in conflict with the requirements set out in the SPD, paragraph 4.46 recognises that the site may require extensive decontamination work.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	505
Title	Paragraph
Number	4.46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	<p>Policy Reference</p> <p>WT4 – Design Requirements – Context</p> <p>Proposed Modification</p> <p>4.46 Context - Proposals should respond to constraints associated with existing utilities restrictions, easements or Health and Safety Executive (HSE) guidance. The cluster contains a former gasholder and significant infrastructure that supported its former use, including a gas mains and gas 'governor' which may make it subjected to substantial decontamination, enabling and remediation. Development will need to carefully consider the impact this infrastructure will have on any proposal.</p> <p>Wandsworth Gasworks presents substantial delivery challenges in relation to a long history of gas production and storage. Given the industrial nature of the area further consideration will need to be given to the cluster to fully understand specific contamination and/or servicing issues. In addition to the landownership challenges the site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas 'governor'. The site may be subject to substantial decontamination, enabling and remediation costs. A combination of these factors may have an impact on deliverability, capacity and viability and these will need to be considered at application stage to ensure that the allocation remains deliverable and can meet the policies of the plan when read as a whole. The policies set out in this plan may be applied flexibly to ensure that the site is viable and deliverable.</p> <p>Justification</p> <p>Quod has worked with Wandsworth Council since 2013 to ensure that this site represents a deliverable site which can contribute to the Council's housing and economic needs. The Wandle Masterplan SPD does recognise the constraints to delivery but these have been omitted from the site allocation.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The site allocation is not considered to be in conflict with the requirements set out in the SPD, paragraph 4.46 recognises that the site may require extensive decontamination work which would be considered as part of a viability assessment of the site at planning application stage.
Proposed Change	No change considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	506
Title	Paragraph
Number	4.48

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference</p> <p>WT4 – Design Requirements – Site Layout</p> <p>Proposed Modification</p> <p>4.48 Site Layout - The cluster should be broken down into a number of small urban blocks to create a distinctive neighbourhood that promotes permeability and legible connections to the wider area. Proposals should incorporate lower elements allowing daylight into perimeter-block courtyards. Economic uses should be clustered together <u>where possible</u> in order to create a distinctive hub of businesses and to help minimise potential conflicts with residential uses. Cultural and creative industries workspace should include yard space and should be public facing <u>where possible</u> in order to enliven the public realm. The potential for a public-facing commercial aspect (such as communal gallery space or individual micro- sized retail units) should be explored. All new development will be required to have frontages on to the existing streets and new streets with entrances.</p> <p>Justification</p> <p>The design constraints of the site, and the land use requirements do not necessarily result in the ability to deliver prescriptive design solutions. The extensive discussion with officers at the Council and the Design Review Panel demonstrate that alternative design solutions are acceptable and can achieve the same positive design outputs. There is no evidence to support 'micro-sized retail units', or perimeter blocks, courtyards, or any particular suggested typology.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The site layout text indicates the Council's preferred layout. Alternative approaches would need to be justified through discussion at pre-app / application stage.
Proposed Change	No change considered necessary.

Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	507
Title	Paragraph
Number	4.49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference</p> <p>WT4 – Design Requirements – Massing</p> <p>Proposed Modification</p> <p>4.49 Massing - Proposals should include buildings with varied height, scale and <u>massing</u> with a focus on courtyard typologies. Low-rise buildings to make an inner spine route to provide a human scale, as well as low-rise buildings facing railway arches to achieve the same effect should be proposed. Massing along the Wandle riverfront should be varied.</p> <p>Justification</p> <p>Extensive discussion with officers at the Council and the Design Review Panel have demonstrated that there are a number of ways to bring this site forward. Low rise buildings do not reflect the development capacity of the site, or its design led optimisation; the tall building allocation; or a necessary successful design solution for the site. The Council has accepted other design solutions which do not include low rise buildings and therefore reference to these buildings should be omitted.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The massing text indicates the Council's preferred massing. Alternative approaches would need to be justified through discussion at pre-app / application stage. Design-led optimisation means ensuring that development is of the most appropriate form and land use for the site that responds to a site's context and capacity for growth. The sites context has been reviewed in the UDS, that has informed the HELAA, and the massing shows the Council's preferred approach as a result.
Proposed Change	No change considered necessary.

Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	508
Title	Paragraph
Number	4.50
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference</p> <p>WT4 – Design Requirements – Nature</p> <p>Proposed Modification</p> <p>4.50 Nature - Works to the banks of along the River Wandle will be expected to contribute to the biodiversity of the area. Consideration should be given to the special ecological and wildlife habitats and allowance for the sensitivity of these should be <u>assessed at application stage, in particular made</u> in the siting, height and design of the buildings and the riverside walk dimensions. <u>Consideration should be given to historic contamination to ensure that any works undertaken to the river edge do not inadvertently create new routes for contamination to migrate to sensitive receptors.</u></p> <p>Justification</p> <p>Extensive discussion with officers at the Council and the Environment Agency have demonstrated that there are a number of options which can deliver biodiversity improvements to the site, and the revised wording reflects this. Detailed analysis of ecological effects of tall buildings along the River Wandle should be undertaken at planning application stage to robustly consider the existing ecological value, specific effects of development and proposed mitigation.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The Wandsworth Biodiversity Strategy (WBS) highlights the importance of the River Wandle for promoting and preserving biodiversity within the borough, and the Council's responsibility to ensure that this habitat is protected in the long term; specifically, that no new developments negatively impact the Wandle and that active steps are taken to enhance this habitat where possible. Therefore, whatever an individual ecological report might conclude, opportunities for enhancements to the River Wandle are of strategic importance and should take precedence unless another priority place, habitat or species would be at risk as a result. The strategy identifies the River Wandle as both a Priority Place (section 8, pages 5-7) and

	as a Priority Habitat (section 9, pages 7-8). The strategy also identifies brown trout as a Priority Species, for which the River Wandle is essential (pages 8-9). To improve the biodiversity of the area, it is agreed that it may not just be works to the river banks that is required and that historic contamination would need to be taken into account when proposing works to the river edge.
Proposed Change	Amend paragraph 4.50 to read: 'Works to the banks of <i>along</i> the River Wandle will be expected to contribute to the biodiversity of the area. Consideration should be given to the special ecological and wildlife habitats and allowance for the sensitivity of these should be made in the siting, height and design of the buildings and the riverside walk dimensions. <i>Consideration should be given to historic contamination to ensure that any works undertaken to the river edge do not inadvertently create new routes for contamination to migrate to sensitive receptors.'</i>
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	509
Title	Paragraph
Number	4.51
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference</p> <p>WT4 – Design Requirements – Building Heights</p> <p>Proposed Modification</p> <p>10.24 Building Heights – In accordance with the tall building maps in Appendix 2, part of the site is located in the Wandsworth tall building zone TB-G1d-02 and should be developed in broad accordance with LP4. The maximum appropriate height range for the zone is 7 to 10 storeys, and the appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings). In accordance with the mid-rise building maps in Appendix 2, part of the site is located in mid-rise building zone MB-G1d-03 (which acts as a transition zone to tall building zone TB-G1d-02), and the maximum appropriate height for the zone is 6 storeys. The height of developments within that zone should not exceed the heights of, and be in accordance with, the mid-rise building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).</p> <p>Justification</p>

	<p>The whole of Site Allocation WT4 should fall within the Tall Building Zone TB-G1d-02. There is no evidence to support the allocation of mid-rise building zone MB-G1d-03, in particular the Wandle Delta Masterplan SPD which is cited as the justification for the allocation. The Regulation 18 Local Plan WT4 site allocation specifically referred to the “potential for towers marking prominent/ gateway locations in north-west and south-east corners of site”. This has now been removed from the Regulation 19 plan without any justification or updated evidence base. The proposed revisions are necessary to make the policy succinct, avoid duplication and sound.</p> <p>The revisions are proposed in accordance with our comments on LP4 and Appendix 2.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations. The Wandle Delta Masterplan indicates a stepping down of building heights towards the river Wandle. Mid-rise zone MB-G1d-03 reflects this thinking.</p> <p>The approach to building height in this area is considered sound. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'restore' area as per the characterisation assessment of the UDS. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p> <p>Following the publication of the London Plan (post Reg 18 consultation), the Regulation 18 consultation comments and the advice of the GLA and Historic England, the council produced an updated UDS which allowed for the consideration of setting maximum heights for locations acceptable for Tall and mid-rise buildings.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	510
Title	Achieving High Quality Places and Design Excellence
Number	14
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>14 Chapter 14 Achieving Design Excellence - Policy LP4 Tall Buildings / Appendix 2 Tall Building and Mid-rise Building Maps - OBJECT</p> <p>Summary</p> <p>The Council has taken an overly mechanistic approach to the allocation of tall building locations and heights in the Borough, supplemented by an unnecessary layer of policy which allocates mid-rise building locations and heights. The approach is overly complex, is inconsistent with national and London Plan policies, has not been viability tested and may prejudice the ability of development sites to achieve other policies in the plan such as the required affordable housing levels and tenure.</p> <p>The result is a paradox. The Reg 19 Plan now comprises very prescriptive and inflexible policy and map requirements (Policy LP4 and Appendix 2), without the detailed analysis being undertaken to support such an approach. The Council's binary position that proposals should not be permitted which conflict with the building zones and heights could undermine the deliverability of the plan.</p> <p>The zones and heights prescribed in Appendix 2 fail to reflect current pre-application advice provided by Wandsworth Council over an extensive period of time which confirms the acceptability of development at heights taller than, and in zones different to, those prescribed in the Reg 19 Plan. There is an obvious detachment between the pre-application advice provided by officers, the Design Review Panel and GLA; and the approach set out in the Reg 19 Plan. There is also an unexplained detachment from the Regulation 18 Local Plan WT4 site allocation which specifically referred to the "potential for towers marking prominent/ gateway locations in north-west and south-east corners of site". This has now been removed from the Regulation 19 plan without any justification or updated evidence base. The proposed revisions are necessary to make the policy succinct, avoid duplication and sound. The fundamental concern is that the Reg 19 Plan does not permit alternatives to be tested through the pre-application process. This should be rectified by modification.</p> <p>London Plan Policy D9 ('LP Policy D9')</p> <p>LP Policy D9 sets a minimum requirement for tall building in London to be no less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This is the equivalent of 7 storeys in total. It applies stringent tests to tall building proposals.</p> <p>There is no explanation why Policy LP4 applies LP Policy D9 to mid-rise buildings of 5 and 6 storeys, and the justification for this. This approach is onerous and is not required by the London Plan. We consider that it would be more succinct to have a single tall building policy which defines zones up to a specific storey height; the final height of which would be subject to detailed testing at the application stage in accordance with LP Policy D9 and Policy LP4. The mid-rise thresholds are unnecessary and should be omitted.</p> <p>LP Policy D9(B) 'Locations' (1) requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. (2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans. (3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p> <p>Notably, LP Policy D9 explicitly requires the consideration of "other requirements of the plan"; that "locations and appropriate tall building heights should be identified on map in the development plan"; and that "tall buildings should only be developed in locations that are identified as suitable in Development Plans". Where location and heights are prescribed in the development plan these should be informed by Part C of Policy D9 (Impacts).</p>

LP Policy D9 does not require inflexible parameter heights, nor does it require tall buildings to only be developed at the heights identified in the development plan. It does however expect a detailed sieving analysis to be undertaken to identify appropriate locations for tall buildings.

This approach was recently tested by the Planning Inspectorate at the Brent Local Plan Review. The Report on the Examination of the Brent Local Plan 2019 -2041 published 17 January 2022 stated the following: -

The Brent Tall Building Strategy which outlined an assessment of suitable locations based on an assessment of the identified growth areas, existing building heights and townscape

considerations such as protected views as well as areas with high public transport accessibility did not undertake a level of sieve analysis as detailed as that envisaged by the London Plan.

However, Subject to the main modifications identified, the approach to both tall buildings and the Intensification Corridors presents a sound approach which accords with both the London Plan and the Framework.

Despite the lack of detailed analysis, the Brent Council Tall Building Local Plan Policy BD2 was found by the Inspectorate to be sound. Importantly, we note that Tall Building Policy BD2 includes the necessary level of flexibility (that we are suggesting) to reflect the practical realities of the planning application process, and the need to meet other policies of the development plan. These are summarised below.

BD2 requires heights to be consistent with the general building heights shown on the plans⁸

BD2 recognises that the plans indicate the heights likely to be generally acceptable to the council⁹.

BD2 states that proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location¹⁰.

BD2 recognises that there might be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable¹¹.

We consider that the approach taken by Brent Council and its interpretation of LP Policy DP9 is correct. LP Policy D9 does not require a rigid and inflexible approach to tall buildings, and as demonstrated, can incorporate a degree of flexibility. This approach was determined to be sound by the Inspectors.

Application of Policy D9 within the Reg 19 Plan – Appendix 2

The Reg 19 Plan seeks to implement the requirements of London Plan Policy D9 at Appendix 2, and in respect of the Gasworks at the following diagrammatical parts of the Reg 19 Plan:-

Map 14.1 Tall Buildings

Map 23.24 Wandsworth Town and Common Tall Building Zone (page 458)

Map 23.27 Tall Building Zone TB-G1d-02 (page 459)

Map 23.36 Wandsworth Town and Common Mid-rise Building Zone (page 468), MB-G1d-03

Map 23.27 Tall Building Zone TB-G1d-02 and Map 23.36 Mid-rise Building Zone MB-G1d-03 are enclosed at Figure 2.

Common Projects supports the allocation of the majority of the Gasworks Cluster (Site Character G1) as an appropriate location for tall buildings under map 14.1 and Map 23.27 Tall Building Zone TB-G1d-02, as a matter of principle. This reflects the wider policies of the plan that seek to optimise the development potential of centrally located sites.

Common Projects does however object to the allocation of part of the site as a Mid-Rise Building Zone and opposes the height parameters (7 to 10 storeys) of the tall building zone. The Council's evidence base considers that site has low sensitivity; high probability of change; and high development capacity and can therefore accommodate a greater scale of development as a town centre location, along a strategic road corridor with a River Thames frontage than the Reg 19 plan suggests. It is considered that the site has low sensitivity (UDS 21, page 8 Sensitivity Plan Fig 212); high probability of change (UDS 21, page 9 Probability of Change Plan Fig 213); and high development capacity (UDS 21, page 10 Development Capacity Plan Fig 214) and can therefore accommodate a greater scale of development as a town centre location, along a strategic road corridor with a River Thames frontage. The dark green indicates the locations most suitable for growth.

The evidence base for the Council's approach to WT4 is set out in the UDS 21 which considers the character of Wandsworth Town at Section 3 Character Area G1 Wandsworth Town and Riverside (page 150); Section 4 Capacity for Growth G Wandsworth Town (page 194 and 206); and Appendix A (A.8 Wandsworth Town page 283). We comment on these below.

UDS 21 – Section 3 Character

Section 3 makes reference to building heights ranging between 2-4 storeys and towers up to 27 storeys within Wandsworth Town Centre. It notes that towers have recently become a feature of the skyline, sometimes uncomfortably relating to adjacent residential areas. It suggests that there is a lack of clear, legible routes connecting the town centre to the River Thames and River Wandle. That new development is often poorly integrated, creating discordant juxtapositions between old and new development and that tall buildings dominate views.

It suggests that the Riverside Quarter lacks design quality. The character of the River Thames and path lacks interest, with inappropriate landscape treatments, including areas that feel private. It suggests that tall buildings by the narrow River Wandle make it feel dark and unpleasant, with cleanliness issues. Incongruous land uses exist in the town centre. We fundamentally disagree with this critique of how Wandsworth Council has planned its own town centre to date, and having been involved in a number of applications within the town over recent years, would fundamentally disagree

with this overtly negative analysis of harm. With regards WT4 the River Wandle is not dark and unpleasant.

The analysis continues that the capacity for further growth - particularly towers and tall buildings - is nearing its limit, albeit there is no explanation on what basis this judgement is made, and what the limit is. It suggests that there may be limited change for very tall buildings although recognises that growth in the right locations could enhance character. It recognises that WT4 is the area planned for change with a low sensitivity to change.

The character analysis proposes a strategy of "restore" of the "existing character" by improving maintenance of remaining characteristic features, restoring historic characteristic features that have been lost over time, and ensuring the future growth of the area reinforces existing character. Given the very varied "existing character" within the sub-region, it is difficult to determine exactly what should be restored.

UDS 21 - Section 4 Capacity for Growth G (page 194 and 206) TB-G1d-02

Whilst the UDS 21 does consider existing building heights at Fig 215, Fig 216 and proposed heights at Fig 217, it is difficult to determine, for Character G1 in particular, how these heights have informed the character study undertaken in the UDS 21.

There is very little mention of the character created by these tall buildings in the UDS 21, despite there being an acknowledgement that they form an important character to the town centre. In particular, the report fails to recognise locations where tall buildings are consented and being built out, the 36 storey Ram Brewery development is the most obvious example (TB-G1-03).

An analysis of the consented or built out tall buildings within Wandsworth Town above 10 storeys are summarised below.

36 storeys (+ 12 storeys buildings) – Ram Brewery (Greenland)

27 storeys – Mapleton Crescent (Pocket) 2015/5777

26 storeys – Wandsworth Exchange (L&Q) 2014/5149

25 storeys - Sudbury House

22 storeys - Argenton Tower, Maplton Road (Barratt) 2002/3275

3 x 22 storeys - Neville Gill Close

21 storeys – Enterprise Way (Barratt) 2009/3017

20 storeys – The Light Bulb, Filament Walk

20 storeys – Pencil Tower, 86-96 Garratt Lane (Baylight Properties) 2017/0535

17* storeys – Buckhold Road, Wandsworth 2013/4653

17- 8 storeys - Former Homebase (L&G) 2020/0011

15 and 3 x 11 storeys - Wandsworth Riverside Quarter Phase 3 (Fraser Group)

15, 12, 12 storeys - Wandsworth Riverside Quarter Phase 2 (Fraser Group)

15 – 8 storeys - Former B&Q (L&G) 2019/4583

14 and 10 storeys – Former Linton Fuels, Osiers Road (Taylor Wimpey) 2016/6164

14 and 10 storeys - 9, 11 and 19 Osiers Road (Hollybrook Limited) 2018/3709

10* storeys – 29 Hardwicks Square

10* storeys – 4 Buckhold Road

3 x 10 storeys - Osiers Square, Osiers Road (Taylor Wimpey) 2014/6746

Common Projects via VuCity, has also produced an illustration of these buildings enclosed at Figure 4 below.

There is very little mention of the character created by these tall buildings in the UDS 21, despite them forming an important character to the town centre, and in particular the River Wandle, used principally as a positive tool which is also recognised by paragraph 3.9.1 of the London Plan.

“Whilst high density does not need to imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and

important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity”¹².

The UDS 21 fails to recognise this and underplays the role those tall buildings contribute to the character of Wandsworth Town, in particular the consistent legible rhythm along the River Wandle to the River Thames.

The justifying commentary for the Gasholder Cluster (TB-G1d-02) only includes, for example, reference to the “Existing prevailing height: 2-3 storeys”. It fails to recognise the numerous tall building proposals that have been consented and are being built out around the Gasholder Cluster including the 36 storey Ram Brewery development, and the 17 storey former B&Q development. It also fails to recognise that scale and mass of the former gasholder on site which was 45m tall (c.15 storeys). This is particularly relevant, as the UDS 21 seeks to “restore” the “existing character” by “restoring historic characteristic features that have been lost over time”.

The supporting text to the UDS2113 states that “Buildings should range in height from west to east with taller elements in the east and northeast of the zone while allowing for stepping down towards the River Wandle, Wandsworth Town Conservation Area and smaller scale buildings further to the east”. There is no explanation what the justification for this approach is, and how this analysis has taken into account the requirements of LP D9 Part C. The approach also contradicts the design advice by Council officers, the Design Review Panel and the GLA who support height rising up to the tallest location in the north west of the site – as a result of the detailed analysis undertaken at pre-planning application stage.

The UDS21 suggests an “Appropriate height: 7-10 storeys (21-30m)”, but again there is no explanation how this height has been derived.

There is no explanation as to how some zones such as TB-G1a-01 – up to 20 storeys; and TB-G1d-

03 – up to 15 storeys (in particular Site Allocation WT14, 15 and WT17) has been defined, especially as site W17 comprises a very large listed building. For example, how is the harm at this site at 15 storeys less than at WT4, certainly give the low sensitivity of the Gasworks Cluster (TB-G1d-02). UDS 21 also identifies the site of the 36 storey Ram Brewery building as a mid-rise building zone again underplaying the significant scale of development to the south of WT4. The analysis is ambiguous and is not appropriate as the backbone for such a rigid tall building policy.

Section 4 dealing with mid-rise buildings (map MB-G1d-03) does not provide any specific commentary or justification and analysis as to why there is a 6 storey height parameter strip along the River Wandle. Section 4.6 Mid-rise buildings provides some commentary on the overall

approach to the borough allocations but there is no site specific analysis. This is not acceptable for such as rigid policy.

Appendix A – Tall Buildings Table 2 Overview of Tall Building Zones (UDS 21 page 213) confirms that the tall building height zone and justification for Tall Building Zone TB-G1d-02 of 7 to 10 storeys is based upon the “analysis of the consented masterplan”. However, the adopted Wandle Delta SPD Masterplan makes it clear that at paragraph 5.6.4 that the “SPD is not prescriptive in setting maximum heights or limits. Instead, appropriate height ranges are provided”.

Moreover, the Wandle Delta SPD Masterplan 2021 does not limit tall buildings along the River Wandle edge. It, much like the Reg 19 Plan, seeks to deliver a Wandle Trail / Riverside walk along the River Wandle bank free from development. It is the delivery of the Wandle Trail and its public accessibility that is important rather than development height along it.

Paragraph 5.6.13 and 5.6.14 of the Wandle SPD Building Height Strategy recognise that there are a number of key areas which are considered to be sensitive which will necessitate the careful moderation of proposals as appropriate (inc. Bell Lane Creek and River Wandle). It states that “Applications for tall buildings will be required to demonstrate that sensitivities have been considered and adequately addressed within proposals”. Common Projects support this approach in the SPD, and notably it does not prevent tall buildings. It is for this reason that the mid-rise building annotation at Appendix 2 (TB-G1d-02) should be deleted, and the tall building zone redrafted so that the boundary moves westwards towards the River Wandle to reflect the pre-application discussions held with the Council, the Environment Agency and the Design Review Panel.

The current drafting of the Mid-Rise Zone ((TB-G1d-02) also fails to recognise the site-specific circumstances that have resulted in Council officers, the Design Review Panel and the GLA agreeing that the northwest corner of the WT4 site is the most appropriate location for the tallest element of the development.

It is recognised that it marks the river crossing; and is in the least sensitive part of the site in respect of adjacent occupiers, and heritage assets. It also casts northern shadow across major infrastructure sites which will not come forward for development in the plan period (WT10) and the industrial sites which have now been excluded from the Reg 19 Site Allocations (Lawsons Timber Yard). Detailed analysis demonstrates that there will be limited effects on the sensitivities of the Bell Lane Creek and River Wandle which cannot be mitigated. Importantly the site sits adjacent to a significant area of open space of c.1ha comprising WT3. These site specific factors have not been taken into account in the UDS 21.

UDS 21 - Appendix A (A.8.4 TB-G1d-02: Wandsworth Town and Riverside page 291).

More detailed analysis appears at Appendix A (A.8.4 TB-G1d-02: Wandsworth Town and Riverside page 291). The analysis incorrectly suggests that the Wandle Delta masterplan includes blocks between 2 and 8 storeys (it illustratively indicates blocks of 4-10 storeys across the whole site).

The analysis undertaken seems to take an approach based upon limited visibility and where development will be seen from as a cue for acceptability. Whilst setting a policy to “restore the historic characteristic features that have been lost over time” it fails to remember the gasholder at WT4 which comprises a 45m (c.15 storey) structure.

It states that “the closest sensitive receptor to this zone is Wandsworth Town Conservation Area. The offset provided from the zone to Armoury Way protects the street scene which is a key part of the character of this area, while the taller parts of the zone would be viewed as stepping up towards the elevated railway and the denser, taller riverside development”. Despite the Ram Tower (36 storey) featuring in the VuCity image at figure 392 (page 293) it doesn’t form any part of the assessment.

The assessment continues “With buildings up to 10 storeys, this zone should also not give rise to adverse effects on wider sensitive receptors including Old York Road Conservation Area to the east and Wandsworth Park Registered Park & Garden to the west”. There is no explanation how this assessment has been validated, certainly given that the former Homebase development contains a

17 storey building directly adjacent to the Old York Road Conservation Area and Wandsworth Park Registered Park & Garden which will dominate this view.

The analysis concludes that “Therefore, the zone is considered to have the capacity for tall buildings between 7 and 10 storeys, provided they are set back appropriately from the River Wandle and step down towards the edges of the plot and the surrounding mid-rise building zones, including to Armoury Way. The tallest buildings should generally be located closest to the railway line and along Swandon Way provided good urban design principles are followed to create a positive experience for people travelling along the road. Additional height beyond 10 storeys would risk adverse effects on the character of Wandsworth Town Conservation Area particularly”. Again, there is no explanation how the UDS 21 has come to a conclusion that height beyond 10 storeys would risk adverse effects on the character of Wandsworth Town Conservation Area.

In its current form, the development currently being discussed with Council officers, the Council’s Design Review Panel and GLA does propose tall buildings in the proposed mid-rise building zone, and does propose (with officer support) buildings taller than 10 storeys following extensive analysis.

This development would not be supported by UDS 21 and Policy LP4 would “not permit” the proposal. This is an unsound approach and identifies the need for greater flexibility throughout the Reg 19 Plan because alternative design solutions could readily address the design ambitions of UDS

- 8 Brent Local Plan Policy BD2
- 9 Brent Local Plan paragraph 6.1.15
- 10 Brent Local Plan paragraph 6.1.15
- 11 Brent Local Plan paragraph 6.1.15
- 12 London Plan paragraph 3.9.1
- 13 UDS 21 page 196

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.

The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.

The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.

	<p>The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>Figures 212, 213 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity, probability of change / development capacity at a level of detail expected from a map of the borough. This approach was used to identify the tall and mid-rise building zones. The identification of building height ranges in the tall and mid-rise building zones have been both informed by the borough-wide maps and further additional analysis as set out in section 4.4 (including the consideration of existing and consented schemes) and 4.5, to be also read alongside the character area profiles set out in section 3 of the UDS. Appendix A provides the supporting evidence and justification for the extents and appropriate heights of each of the proposed building zones is It is considered that this approach is sound in accordance with the NPPF and London Plan. Building height ranges are further evidenced for this area within the Wandle Delta Masterplan.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	511
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Application of Policy D9 within the Reg 19 Plan – LP4</p> <p>Despite Policy LP4 defining very strict tall building zones and heights based upon the UDS 21, Policy LP4 still states that tall buildings in Tall Building Zones would only be appropriate where the development would not result in any adverse visual, functional, environmental and cumulative impacts.</p> <p>It requires planning applications for tall buildings to be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 (this comprises twenty-one criteria) and an additional nineteen local criteria set out at Policy LP4 (1 to 19). This demonstrates that that the analysis undertaken to define tall building locations and heights in Wandsworth by the UDS 21 is not sufficiently detailed to support the prescriptive tall building zones and heights. If it was detailed enough there would be no need for 40 criteria to be considered.</p> <p>This does not appear to be proportionate and succinct planning that avoids duplication. Despite the 40 criteria LP4 (C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and LP4 (D) states that proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones. Further the height of tall buildings will be required to step down towards the edges of the zone (unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area).</p> <p>In our opinion, this approach is excessive. It would be more succinct to retain some of LP4 criteria (where they are demonstrated to be necessary) but introduce flexibility which can be tested during the planning application process, as is the case with the Brent Local Plan.</p> <p>We would suggest that the following wording is introduced as a modification: -</p> <p>Heights should be consistent with the general building heights shown on the Tall Building Zone Maps.</p>

Maps indicate the heights likely to be generally acceptable to the council.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and deliverable when the plan is read as a whole.

Where the quality of design of a development and its impact (when tested against the criteria) is such that taller buildings that exceed the general heights in these locations could be shown by applicants to be acceptable then flexibility will be applied.

This is a necessity for Site WT4 as the emerging policy does not reflect the advice received during pre-application discussions.

This would also address paragraph 14.31 which states that "Development proposals exceeding the appropriate height will not be supported on design grounds". We suggest that the following modifications are undertaken to make Policy LP4 sound:

Policy

Reference

LP4 - Tall and Mid-rise Buildings

Proposed Modification

C. Proposals for tall buildings should ~~will~~ not be permitted outside the identified tall building zones.

D. Proposals for tall buildings should be consistent with the general not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings may will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.

G. Proposals for mid-rise buildings should ~~will~~ not be permitted outside the identified tall and mid-rise building zones.

Proposed

The plans indicate the heights likely to be generally acceptable to the council.

-

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and that the site allocation is deliverable when the plan is read as a whole.

Paragraph 14.31 - Development proposals exceeding the appropriate height will not be supported on design grounds unless it can be demonstrated through successfully addressing the tests in LP4(B) that there are circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.

Modification to

Supporting Text

Justification

The policy should allow a degree of flexibility so that tall and mid-rise building may be permitted outside of the designated zones in exceptional circumstances.

	<p>This is particularly pertinent to mid-rise buildings, to which the Policy D9 of the London Plan makes no allowance for the identification of non-tall building zones (i.e. mid-rise buildings) through a Development Plan.</p> <p>Common Projects has tested the effect of LP4 Appendix 2 (zone and heights) which could limit development to a residential capacity of c.370 homes across that part of the WT4 allocation that it controls. This would broadly correlate to the indicative capacity of 481 homes across 4 – 10 storeys across the whole WT4 site set out in the Wandle Delta Masterplan SPD (2021) which our client made substantial representations to.</p> <p>Common Projects has tested the deliverability of 370 homes against the Council's affordable housing policy, and the results indicate that at the heights prescribed (and the resulting residential capacity) this would raise serious questions about the deliverability of the allocation without the flexibility required, due to the existing abnormal costs. The proposal could not viably deliver any affordable housing. It is therefore necessary to modify Policy LP4 to permit flexibility in order to meet other policies within the plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The UDS sets out the character of the borough which has been divided into seven 'places' and 25 character areas. Each 'place' is introduced, followed by the character area profiles for the character areas within it. The profiles begin with the key characteristics of the character area, followed by valued features and negative qualities. These aspects aim to capture the key aspects of character at a high level. This analysis, coupled with the sensitivity and change analysis, development capacity assessment and consideration of existing and consented tall buildings mapping has informed the identification of the tall and mid-rise building zones and appropriate height range. The conclusions of this work has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery. In all cases, the acceptability of individual plots will depend on specific characteristics of the site.</p> <p>An area designated as a tall building zone does not mean it has capacity to receive tall buildings within the appropriate range across the whole extent. Every new development will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area including those going through planning, consented schemes and buildings under construction. The criteria of LP4 would require an applicant to justify a scheme's proposed height within the context of the findings of the UDS and identified height ranges of LP4 Appendix 2. The Council considers the approach to planning for tall and mid-rise buildings is based on a robust and credible evidence base and has been developed within the vision and objectives of the Plan.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford

Agent Organisation Details	Director Quod
Comment ID	512
Title	WT10 Land at The Causeway, SW18
Number	Statement 10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>15 Site Allocation – Land at Causeway W10, SW18 – OBJECT</p> <p>During the consultation of the Wandle Delta Masterplan, Common Projects raised concern with the allocation of undeliverable (and therefore unsound) sites within the Masterplan which resulted in (1) an overestimation of housing sites in the Masterplan (2) the introduction of housing in locations at proposed building heights that were unrealistic.</p> <p>Whilst the Council has removed the Lawsons timber yard and adjacent land from the Smugglers Way cluster as a result of the opposition to redevelopment by the landowner, the Council has maintained site WT10 (Land at Causeway) as a site allocation. We believe WT10 should be removed as an undeliverable site allocation.</p> <p>The supporting text states that the Head House (to the west of Bell Lane Creek) could be developed for residential use above the ground floor. The Switch House (to the east of Bell Lane Creek) could be developed for residential if it was made redundant. The report continues that the Head House is needed for the foreseeable future and will make feasibility and viability challenging. Proposals would require further discussions with the landowner EDF Energy and UK Power Networks. Common Projects has spoken to the landowner who has confirmed that the sites will not be available during the plan period (2023 – 2038). They should therefore be removed from the site allocations.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. It is acknowledged that the development of WT10 provides challenges, however the site is considered to form a key part in the regeneration of the Wandle Delta and other opportunities are aimed to be achieved through the allocation of the site in recognising its importance to the Masterplan and the enhancement of the site/area. The HELAA applies a low development probability for this site meaning that the effect on of this site in meeting the housing target is negligible.
Proposed Change	No change considered necessary.
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford

Agent Organisation Details	Director Quod
Comment ID	513
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>16 Policy LP23 (Affordable Housing) – OBJECT</p> <p>Common Projects support the Council's intention to adopt the London Plan's Fast Track Route for affordable housing. However, the Policy LP23 should define that the Fast Track Route will be available to developments that deliver a minimum of 35% affordable housing in line with Policy H5 of the London Plan. Accordingly, the following amendments are recommended:</p> <p>Policy Reference LP23 – Affordable Housing (B) Proposed Modification B. Development that creates 10 or more dwellings (gross) on individual sites must provide a minimum of 35% affordable housing on-site (measured by habitable room) to qualify for the <u>Fast Track Route</u> threshold approach set out by London Plan Policy H5.</p> <p>Justification In order to align with Policy H5, the draft policy wording should also be updated to define that the percentage of affordable housing shall be measured by habitable rooms (as detailed at Para 17.16).</p> <p>Common Projects object to the Council's proposed tenure split at 50% low-cost rent products, 25% First Homes and 25% other intermediate products as this limits flexibility within the intermediate tenure.</p> <p>To remedy this, the following modification is proposed.</p> <p>Policy Reference LP23 – Affordable Housing (C) Proposed Modification</p>

C. The Council will require an affordable housing tenure split of 50% low- cost rent products, and 50% intermediate products, which should aim to provide 25% as First Homes and 25% other intermediate products. A minimum discount of 30% will be applied to First Homes.

Justification

Whilst the affordable housing mix aligns with the adopted London Plan Policy H7 (30% low cost rent, 30% intermediate and 40% to be determined by the borough) and the national policy to provide a minimum of 25% of new homes as discounted First Homes, it is considered that the proposed affordable housing mix does not provide sufficient flexibility, and may discourage developers who are unable to accommodate First Homes within their business model, which may curtail the borough's ability to deliver the affordable homes it needs.

Common Projects support the amendments to LP25 (Part G), which now allow the use of Vacant Building Credit in specific circumstances. The following amendments are proposed to streamline the policy wording.

Policy

Reference

LP23 – Affordable Housing (G)

Proposed

Modification

G. The application of the Vacant Building Credit (VBC) ~~is not appropriate in Wandsworth. The use of VBC~~ will only be considered in limited circumstances, where applicants clearly demonstrate there are exceptional reasons why it is appropriate and all of the following criteria are met:

1. The building is not in use at the time the application is submitted.
2. The building is not covered by an extant or recently expired permission.
3. The site is not protected for alternative land use.
4. The building has not been made vacant for the sole purpose of redevelopment.

Common Projects objection to Part H) of Policy LP23, which requires affordable housing or financial contributions to be sought on all developments delivering new dwelling. To make the policy sound, the following amendment is proposed:

Policy

Reference

LP23 – Affordable Housing (H)

Proposed

Modification

H. The provision of affordable housing or financial contributions will be sought from any major development creating 10 or more ~~Common People~~ provision for new dwellings (gross) or the provision of residential accommodation with shared facilities.

Justification

The Planning Obligations NPPG (2019) is clear that obligations for affordable housing should only be sought for 'major residential developments', which is defined as 10 or more homes. Affordable housing contribution should therefore not be sought on residential development providing 9 or less homes, as this conflicts with the NPPG.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy LP23 cross refers to Policy H5 where the threshold approach and Fast Track Route are explained. This does not need reiterating in the Local Plan.</p> <p>The policy clearly sets out the Council's requirement for a provision of 50% low cost rented housing in accord with the London Plan ambition, and its tenure split, set out at policies H4 and H6. Evidence suggests that this is a realistic target. Changes are made to the policy to seek a balance of intermediate products based on the low-cost rent element achieved.</p> <p>First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Changes are made to the supporting text to Policy LP23 to explain this. Uncertainty exists as to the deliverability and viability of First Homes throughout the borough, and no First Homes have been secured in the borough to date. Given this uncertainty, it is agreed that a requirement for First Homes should be removed from the policy, and instead rely upon the reference to First Homes in national policy.</p> <p>Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability. It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. So therefore, it is considered that flexibility should be introduced into the wording to seek a balance of intermediate products - which should include First Homes - after the agreement of the low cost rented element, which would reflect those differing circumstances on sites across the borough.</p> <p>The Local Plan doesn't disapply the VBC. It defines circumstances in which it can be applied. The policy justification explains why the VBC has been treated in this way.</p> <p>Criterion (A) states that affordable housing will be sought in accordance with the London Plan, and criterion (B) provides the relevant thresholds. Criterion (H) is there to clarify that the policy applies to all C3 dwellings, for the avoidance of doubt.</p> <p>Introduction of 'at least' prior to the provision of 50% low cost housing stems from representations made elsewhere.</p>
Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the <u>The</u> updated Planning Practice Guidance, <u>requires</u> 25% of all homes required <u>delivered</u> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <u>should be</u> discounted by at least 30% against the market value, <u>acknowledging the variance of market conditions across the borough</u>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	514
Title	LP30 Build to Rent
Number	Policy 41

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>18 Policy LP30 (Build to Rent 'B2R') – OBJECT</p> <p>Policy LP30 must be in general conformity with LP Policy H11 and must comply with National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-20180913 to be sound.</p> <p>LP Policy H11 confirms that the affordable housing offer for B2R developments can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level where criteria are met. For non-public land and industrial sites, to follow the Fast Track Route, Build to Rent schemes must deliver at least 35 per cent affordable housing with at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents. The LP and supporting Affordable Housing and Viability SPG recognise the benefits of B2R, noting the additionality in housing supply, accelerated delivery and the truly integrated communities which pepper potted DMR homes enable, with every resident enjoying the same amenities and sharing the same spaces.</p> <p>NPPF paragraph 65 exempts B2R homes from the national requirement of at least 10% of the total number of homes comprising affordable home ownership. NPPG states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents.</p> <p>Both national and regional guidance recognise that scale is critical to the viability of B2R and that the unified ownership of both private rent and DMR homes enables greater scale and therefore efficiency, supporting the delivery of the affordable homes. National policy and the supporting text to LP policy H11 note the challenging distinct economics of B2R and the policy flexibilities which help overcome these.</p> <p>In contrast, Wandsworth Council are proposing a more onerous approach to the affordable housing requirements drawn down from a B2R proposal by seeking a tenure split of 50% low cost housing and 50% intermediate products.</p> <p>The whole plan viability study identifies this as having a viability impact, noting that it is unviable in the base case (paragraph 7.14). It recognises that this would potentially risk the delivery of this type of scheme. As such flexibility within Local Plan to allow for less burdensome policies, such as the overall housing rate and/or tenure with such schemes is proposed.</p> <p>Figure 5 – Whole Plan Viability Assessment Paragraph 7.14</p> <p>We do not consider that the financial implications of the policy have been sufficiently tested to evidence a departure from the London Plan and National Policy. In addition, the policy does not recognise (the many) circumstances where registered providers are unwilling or unable to manage affordable homes in a B2R development.</p> <p>To resolve our concerns, the following modifications are proposed.</p> <p>Policy Reference LP30 – Built to Rent Proposed</p>

	<p>Modification</p> <p>1. Where a development has potential to include more than one residential core and/or block, applicants should <u>may consider the</u> use of this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Fast Track Route, 50 per cent of the overall affordable housing requirement should be provided as low-cost products within this separate core and/or block, with the remaining 50 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If the above requirements are not met, the scheme must follow the Viability Tested route. In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole.</p> <p>2. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design, <u>viability or deliverability</u> terms to include a separate residential core and/or block in the development proposal; <u>or it can be evidenced that a registered provider cannot or is unable to manage the low- cost products</u>, the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy. To follow the Fast Track Route, the Council will seek 30 per cent of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If these requirements are not met, the scheme must follow the Viability Tested route.</p> <p>3. Build to Rent housing should <u>seek to</u> provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).</p> <p>Justification</p> <p>To ensure consistency with LP Policy H11 and National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-20180913.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The supporting text sets out the Council's preference, where possible, to secure low cost rented housing through BtR schemes, allowed for by London Plan para 4.11.10. Under these circumstances, criterion A.1 would apply, and reference to an RP is relevant and necessary, alongside the reference, in design terms, to a separate block which is designed to aid management.</p> <p>The policy is considered to be clear in its approach to the BtR sector and positively worded. London Plan policy H11 is clearly referenced as a starting point, but the Council seeks to determine locally relevant criteria as allowed for within the London Plan.</p> <p>The Plan already recognises the potential viability issues within the lower values areas expressed by the evidence (WPVA) by seeking low-cost rent 'where possible. Criterion (e) of policy LP24 ensures that the policy is applied on a site by site basis and considers context, need and viability.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	515
Title	LP24 Housing Mix
Number	Policy 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>17 Policy LP24 (Housing Mix) – OBJECT</p> <p>Policy LP24 is not in general conformity with LP H10 Housing Site Mix which generally requires¹⁴ a higher proportion of one and two bed units in locations which are closer to a town centre or station or with higher public transport access and connectivity as these are more appropriate locations.</p> <p>Policy Reference LP23 – Affordable Housing Proposed Modification</p> <p>E. The dwelling mix will be considered on a site by site basis and in applying the preferred housing mix regard will be given to:</p> <ol style="list-style-type: none"> 1. current evidence in relation to housing need; 2. the surrounding context and character; 3. the overall level of affordable housing proposed; and 4. the financial viability of the scheme. <p>5. <u>generally a higher proportion of one and two bed units in locations which are closer to a town centre or station or with higher public transport access and connectivity</u></p> <p>Justification To be in general conformity with the London Plan Policy H10(6)</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The amendment is unnecessary as it repeats London Plan policies. Appropriate decision making can be made through this and the other policies of the plan (including SDS1, LP1)
Proposed Change	No change considered necessary
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	516
Title	LP35 Mixed-Use Development on Economic Land
Number	Policy 46
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>19 Chapter 18 Building A Strong Economy - Policy LP35 (Mixed-Use Development on Economic Land) – OBJECTION</p> <p>Common Projects is concerned with the ambiguity of Policy LP35.</p> <p>Policy Reference LP35 – Mixed-Use Development on Economic Land Proposed Modification</p> <p>A(2) Economic Use Intensification Areas (EUIAs): Proposals which would result in the intensification of existing economic floorspace will be supported. Where the site accommodates an existing industrial use, or where the site previously accommodated industrial uses (<u>as the last lawful use</u>), the proposal must provide for an increase in industrial floorspace (<u>the</u></p>

	<p><u>existing industrial use will take precedence</u>). It is appropriate for existing office floorspace to be replaced by industrial floorspace as part of the re-provision and intensification of the economic floorspace. Development within the</p> <p>Bendon Valley EUIA is expected to provide at least a 50% increase in the amount of existing economic floorspace, and development within EUIAs in the Wandle Delta sub-area is expected to provide at least a 25% increase in the amount of existing economic floorspace. In the latter, a strategic approach for the redevelopment of the area has been set out within an area masterplan, which outlines how this ambition can be realised cumulatively across the sites. Schemes that conform with that approach will be supported. Further information is included within the relevant Site Allocations.</p> <p>Justification To remove ambiguity.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	It is agreed that the addition of 'the last lawful use' assists in removing potential ambiguity, however the intention of the designation is to support the intensification of industrial use, and so the second clarification ('the existing industrial use will take precedence') is not proposed.
Proposed Change	Amend LP35.A.2 as follows: "...Where the site accommodates an existing industrial use, or where the site previously accommodated industrial uses (<i>as the last lawful use</i>), the proposal must provide for an increase in industrial floorspace. It is appropriate for..."
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	523
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>20 Chapter 18 Building A Strong Economy - Policy LP38 (Affordable and Open Workspace) – COMMENT</p> <p>Common Projects object to the current policy that requires all development delivering any economic floorspace, regardless of size, to make a contribution to the provision of affordable and/or open workspace. A floorspace threshold should be set whereby only when exceeding the specified economic floorspace amount will a contribution towards affordable workspace be requested. It is a generally acknowledged principle that there should be a threshold above which affordable workspace is provided – this is 1,000sqm.</p> <p>To resolve our concerns, the following modifications to Policy LP38 are proposed:</p> <p>Policy Reference LP38 – Affordable and Open Workspace Proposed Modification</p> <p>A. All development that provides economic floorspace <u>in excess of 1,000sqm (GIA)</u> will, <u>subject to scheme viability</u>, be expected to contribute to the provision of affordable and/or open workspace, <u>for a period of 30 years unless otherwise agreed in perpetuity</u>; which will be secured by way of S106 planning obligation and/or conditions, with details provided in an Affordable Workspace Management Plan. Planning applications will be assessed in accordance with the following:</p> <p>1. Developments that would provide less than 1,000 sqm of economic floorspace will be expected to provide for a range of unit sizes, unless a specific end user has been identified and there is sufficient certainty regarding their occupation at the time of submitting the application; or if the proposed development is for a co-workspace (or similar open workspace models).</p> <p>12. Developments that would provide more than 1,000 sqm of economic floorspace will, subject to scheme viability, be expected to.</p> <p>Justification</p> <p>The draft Policy does not provide sufficient flexibility and cannot therefore respond to changes in market conditions and demand. It should relate specifically to proposals which provide over 1,000sqm of economic floorspace only. Policy LP38(A)(1) is ambiguous and ineffective and should be deleted. We consider it unreasonable to apply a period of perpetuity without including a mechanism for release from this restriction. There are several scenarios whereby the developer could be prejudiced through application of this policy in the long term. For example: during a recession or if the existing business was poorly management.</p> <p>As there is no flexibility to the current policy, this could also lead to the unintended consequence of workspace being vacant if neither a local business nor start-up space operator is willing, or able to take on the space. Flexibility to the wording should be added to allow for the workspace to revert to being a market unit for an agreed period of time (i.e. 1-3 years) post- practical completion, if an occupier that meets the above requirements cannot be found during a 6-month marketing period.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	<p>Policy LP38 provides two options for the provision of affordable and/or managed workspaces, both of which are considered to fulfil the Council's objectives of providing workspace for start-up businesses, SMEs, and other users who through their operation require affordability features (e.g. cultural uses). An identified need for such premises is set out in the borough's Employment Land and Premises Study. For developments of less than 1,000 sqm, the expectation (as per LP38.A.1) is only that developments provide for a range of unit sizes, which is not considered to be onerous, ambiguous or ineffective. Indeed, it represents the position of the adopted Local Plan which has worked well in practice. The impact of delivering affordable workspace on the viability of a proposals which contains over 1000 sqm of economic floorspace is already accounted for within LP38.A.2. The amendment to remove LP38.A.1 as suggested within this representation would result in the new Local Plan delivering less affordable workspace than the existing framework, which is not consistent with the strategic ambitions of the Local Plan.</p> <p>It is agreed that it would add clarity to the Local Plan to set a timeframe for the provision of the period for which the affordable workspace should be provided, as this help to clarify in instances where a financial contribution is made. A term of thirty years as proposed in the representation is considered appropriate.</p> <p>The provision of the affordable or open workspace must be agreed with the Council through an Affordable Workspace Management Plan, which is secured by s106. As set out in the Planning Obligations SPD, the Council's Economic Development Office will work with the developer to agree appropriate arrangements to ensure that the affordable workspace provision or features are met, including through the nominations of operators. There is considered to be little risk that affordable workspace will remain unlet, however if for any reason on site provision is not achievable, the Planning Obligations SPD sets out a mechanism for a contribution in lieu of this provision.</p>
Proposed Change	<p>Amend LP38.A as follows:</p> <p>"All development that provides economic floorspace will be expected to contribute to the provision of affordable and/or open workspace, in perpetuity <i>or for a minimum of 30 years</i>, which will be secured..."</p> <p>Amend LP38.A.2.b as follows:</p> <p>"Provide a proportion of economic floorspace at an affordable rent and with layouts, operations and services which support the provisions in part B below, in perpetuity <i>or for a minimum of 30 years</i>, as follows:"</p> <p>Amend LP38.A.3 as follows:</p> <p>"The redevelopment of existing affordable and open workspace must re-provide the maximum viable quantity of such economic floorspace in perpetuity <i>or for a minimum of 30 years</i>, at equivalent rents (taking into account..."</p> <p>Amend paragraph 18.69 as follows:</p> <p>"If the development does not propose providing open workspace with sufficient affordability features, a proportion of floorspace will alternatively be secured at an affordable rent in perpetuity <i>or for a minimum of 30 years</i>, subject to scheme viability..."</p>
Consultee Full Name	SGN Mitheridge
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod

Comment ID	524
Title	LP42 Development in Centres
Number	Policy 53
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 19 Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres</p> <p>LP 42 Development in Centres</p> <p>Common Projects welcome and support the acceptability of residential uses in designated centres as set out at Policy LP42(D) where it comprises high density, mixed use development.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.

Consultee Full Name	Legal and General Property Partners
Consultee Organisation Details	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	526
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Consultation on the Wandsworth Publication Draft Local Plan (Regulation 19) Representations made on behalf of Legal and General Property Limited The Town and Country Planning (Local Planning) (England) Regulations 2012</p> <p>Quod is instructed by Legal and General Property Limited ('L&G') to submit representations to the Wandsworth Publication Local Plan Regulation 19 (hereby the "Reg 19 Plan"). These representations are submitted within the consultation period that runs from 10th January to 28th February 2022, and principally relate to the former B&Q and Homebase sites, Smugglers Way, Wandsworth, Site Allocation WT12 and 13, also known as the Swandon Way Cluster.</p> <p>L&G has made representations to the Regulation 18 Local Plan and the Wandle Delta Masterplan SPD.</p> <p>L&G is currently building out two planning permissions. Planning permission 2020/0011 (Site allocation WT12 Former Homebase) comprises buildings up to seventeen storeys and 2019/4583 (Site allocation WT13 Former B&Q) comprise buildings up to fifteen storeys. These are material considerations which should inform the Regulation 19 Plan as they are permissions approved by the Council and therefore they represent acceptable developments.</p> <p>A summary of our objections is set out in Table 1 below.</p> <p>Policy</p> <p>Reason for non-conformity</p> <p>Strategic Policies</p> <p>L&G believe that Policy LP4 Tall Buildings and Appendix 2 should be a strategic policy due to the strategic implications it has on the plan as a whole.</p> <p>Early and</p>

Effective

The NPPF requires plans to be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees. The Reg 19 Local Plan consultation is the first opportunity that stakeholders have been able to review and comment on the draft Plan, including notably the Council's proposed approach to tall buildings (LP4 an Appendix 2). L&G has been in constant dialogue with the Council since 2019 yet was not made aware of the Council's new approach to controlling building heights until the Reg 19 plan was issued for consultation. Given the wider implications of this policy, it is considered that earlier and more effective engagement should have been undertaken.

Engagement

Map 3.2

Site

L&G supports the allocation of the former Homebase and B&Q sites as development plan allocations.

Allocations

Site Allocation WT12

Homebase, Swandon

L&G support the site allocation albeit the current wording is ambiguous and should refer to mixed use development including residential and economic floorspace. The developments are also being built out in accordance with planning permissions 2019/4583 and 2020/0011 as material considerations which should be referenced.

The site allocations should refer to the "former" Homebase and B&Q stores. Alternatively, as these buildings do not exist, the site address should be used.

Building heights - In accordance with the tall building maps in Appendix

2, the cluster is located in tall building zone TB-G1d-03. The maximum appropriate height range for the zone is 7 to 15 storeys. The application of a height parameter of 15 storeys which is two storeys lower than that approved by the Council under planning permission 2020/0011 is simply not justified, and is not therefore sound. The Council granted planning permission in October 2021, and there is no new evidence which would justify an alternative approach to that proposed and approved under permission 2020/0011. The policy should be revised to refer to

17 storeys.

Way, SW18 and

WT13 B&Q,

Smugglers Way,

SW18

LP4 - Tall Buildings and Appendix 2

The policy is not justified. It is inconsistent with Policy D9 of the London Plan and the maximum zones and heights proposed are not justified by the evidence base Urban design Study 2021 ('UDS 21'). This document uses an "Analysis of existing buildings and consented masterplan" (by which is meant the SPD) as justification for the proposed heights, not recent planning permissions that are currently being built out. The policy is inflexible as it does not permit heights beyond those prescribed despite planning permission having been granted by the Council for taller buildings. This is unsound.

Policy LP23 - Affordable Housing

To ensure consistency with the London Plan and National Policy.

Policy LP24 - Housing

Mix

To ensure consistency with the London Plan.

	<p>Policy LP30 – Build to Rent</p> <p>To ensure consistency with LP Policy H11 and National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-20180913 and to include flexibility as required by the Council's whole plan viability statement.</p> <p>Conclusion</p> <p>On behalf of L&G, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p> <p>Following the publication of the London Plan (post Reg 18 consultation), the Regulation 18 consultation comments and the advice of the GLA and Historic England, the council produced an updated UDS which allowed for the consideration of setting maximum heights for locations acceptable for Tall Buildings. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings. It is considered that effective engagement was carried out at all stages of the Plan.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Legal and General Property Partners
Consultee Organisation Details	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	527
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation

Chapter 14 Achieving Design Excellence - Policy LP4 Tall Buildings / Appendix 2 Tall Building and Mid-rise Building Maps - OBJECT

L&G support the identification of W12 and W13 as a tall building location Appendix 2 Map 23.28 Tall Building Zone TB-G1d-03.

L&G, however, consider that the height parameter proposed at Map 23.28 Tall Building Zone TB- G1d-03 of 7 to 15 storeys is unjustified by the evidence base to the Local Plan, and fails to acknowledge planning permission 2020/0011 granted by the Council for a seventeen-story development in October 2021.

The UDS 21 evidence base considers the site allocation at Page 294 A.8.5 TB-G1d-03: Wandsworth Town and Riverside. The analysis fails to refer to planning permission 2020/0011 and does not refer to development approved at seventeen storeys. This is an omission and should be rectified through a revision to TB-G1d-03 up to seventeen storeys.

L&G are also concerned with the approach taken for Policy LP4. Despite the policy defining very strict tall building zones and heights based upon the UDS 21. Policy LP4 still states that tall buildings in Tall Building Zones would only be appropriate where the development would not result in any adverse visual, functional, environmental and cumulative impacts. It requires planning applications for tall buildings to be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 (this comprises twenty-one criteria) and an additional nineteen local criteria set out at Policy LP4 (1 to 19). This would indicate that the analysis undertaken to define tall building locations and heights in Wandsworth by the UDS 21 is not sufficient to support the very detailed tall building zoning and prescriptive heights.

This does not appear to be proportionate and succinct planning that avoids duplication, particularly where LP4 (C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and (D) proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones, and the height of tall buildings will be required to step down towards the edges of the zone (unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area).

L&G suggest that the following wording is introduced into LP4 as a modification: -

Heights to be consistent with the general building heights shown on the Tall Building Zone Maps.

Maps indicate the heights likely to be generally acceptable to the council.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and deliverable when the plan is read as a whole.

Apply flexibility whereby circumstances where the quality of design of a development and its impact on character is such that taller buildings that exceed the general heights in these locations could be shown by applicants to be acceptable.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach. For this site, a key factor in the identification of the height range is the sensitivity of the River Wandle and the cumulative effects that the existing tall buildings have on the character of the area.</p> <p>The UDS sets out the character of the borough which has been divided into seven 'places' and 25 character areas. Each 'place' is introduced, followed by the character area profiles for the character areas within it. The profiles begin with the key characteristics of the character area, followed by valued features and negative qualities. These aspects aim to capture the key aspects of character at a high level. This analysis, coupled with the sensitivity and change analysis, development capacity assessment and consideration of existing and consented tall buildings mapping has informed the identification of the tall and mid-rise building zones and appropriate height range. The conclusions of this work has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery. In all cases, the acceptability of individual plots will depend on specific characteristics of the site. An area designated as a tall building zone does not mean it has capacity to receive tall buildings within the appropriate range across the whole extent. Every new development will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area including those going through planning, consented schemes and buildings under construction. The criteria of LP4 would require an applicant to justify a scheme's proposed height within the context of the findings of the UDS and identified height ranges of LP4 Appendix 2. The Council considers the approach to planning for tall and mid-rise buildings is based on a robust and credible evidence base and has been developed within the vision and objectives of the Plan.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Legal and General Property Partners
Consultee Organisation Details	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	528
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Policy LP23 (Affordable Housing) – OBJECT

	<p>L&G support the Council's intention to adopt the London Plan's Fast Track Route for affordable housing. However, the Policy LP23 should define that the Fast Track Route will be available to developments that deliver a minimum of 35% affordable housing in line with Policy H5 of the London Plan.</p> <p>L&G object to the Council's proposed tenure split at 50% low-cost rent products, 25% First Homes and 25% other intermediate products as this limits flexibility within the intermediate tenure. Flexibility should be introduced.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The first criterion of LP23 states that Wandsworth will seek to maximise the delivery of affordable housing in accordance with the London Plan, and Criterion (B) mentions the threshold approach and provides a cross-reference to Policy H5 of the London Plan. It is felt that this is sufficiently specific without repeating other policy guidance.</p> <p>First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Changes are made to the supporting text to Policy LP23 to explain this. Uncertainty exists as to the deliverability and viability of First Homes throughout the borough, and no First Homes have been secured in the borough to date. Given this uncertainty, it is agreed that a requirement for First Homes should be removed from the policy, and instead rely upon the reference to First Homes in national policy.</p> <p>Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability. It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. So therefore, it is considered that flexibility should be introduced into the wording to seek a balance of intermediate products - which should include First Homes - after the agreement of the low cost rented element, which would reflect those differing circumstances on sites across the borough.</p> <p>Introduction of 'at least' prior to the provision of 50% low cost housing stems from representations made elsewhere.</p>
Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the <u>The</u> updated Planning Practice Guidance, <u>requires</u> 25% of all homes required <u>delivered</u> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <u>should be</u> discounted by at least 30% against the market value, <u>acknowledging the variance of market conditions across the borough</u>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>
Consultee Full Name	Legal and General Property Partners
Consultee Organisation Details	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	529
Title	LP24 Housing Mix

Number	Policy 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP24 (Housing Mix) – OBJECT</p> <p>Policy LP24 is not in general conformity with LP H10 Housing Site Mix which acknowledges¹ that a higher proportion of one and two bed units is appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. The policy should be revised to state that generally a higher proportion of one and two bed units in locations which are closer to a town centre or station or with higher public transport access and connectivity</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The amendment is unnecessary as it repeats London Plan policies. Appropriate decision making can be made through this and the other policies of the plan (including SDS1, LP1)</p>
Proposed Change	No change considered necessary

Consultee Full Name	Legal and General Property Partners
Consultee Organisation Details	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	530
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Chapter 18 Building A Strong Economy - Policy LP38 (Affordable and Open Workspace) – OBJECT L&G object to the policy which requires all development delivering any economic floorspace, regardless of size, to make a contribution to the provision of affordable and/or open workspace. Policy LP38 should relate to developments which propose in excess of 1,000sqm (GIA) of economic floorspace.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Policy LP38 provides two options for the provision of affordable and/or managed workspaces, both of which are considered to fulfil the Council's objectives of providing workspace for start-up businesses, SMEs, and other users who through their operation require affordability features (e.g. cultural uses). An identified need for such premises is set out in the borough's Employment Land and Premises Study. For developments of less than 1,000 sqm, the expectation (as per LP38.A.1) is only that developments provide for a range of unit sizes, which is not considered to be onerous, ambiguous or ineffective. Indeed, it represents the position of the adopted Local Plan which has worked well in practice. The amendment as suggested within this representation would result in the new Local Plan delivering less affordable workspace than the existing framework, which is not consistent with the strategic ambitions of the Local Plan.
Proposed Change	No change considered necessary.
Consultee Full Name	Legal and General Property Partners
Consultee Organisation Details	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
Agent Full Name	Ben Ford

Agent Organisation Details	Director Quod
Comment ID	531
Title	LP30 Build to Rent
Number	Policy 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP30 (Build to Rent 'B2R') – OBJECT</p> <p>Policy LP30 should be in general conformity with LP Policy H11 and must comply with National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-20180913 to be sound.</p> <p>LP Policy H11 confirms that the affordable housing offer for B2R developments can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level where criteria are met. For non-public land and industrial sites, to follow the Fast Track Route, Build to Rent schemes must deliver at least 35 per cent affordable housing with at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents. The LP and supporting Affordable Housing and Viability SPG recognise the benefits of B2R, noting the additionality in housing supply, accelerated delivery and the truly integrated communities which pepper potted DMR homes enable, with every resident enjoying the same amenities and sharing the same spaces.</p> <p>NPPF paragraph 65 exempts B2R homes from the national requirement of at least 10% of the total number of homes comprising affordable home ownership. NPPG states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents.</p> <p>Both national and regional guidance recognise that scale is critical to the viability of B2R and that the unified ownership of both private rent and DMR homes enables greater scale and therefore efficiency, supporting the delivery of the affordable homes. National policy and the supporting text to LP policy H11 note the challenging distinct economics of B2R and the policy flexibilities which help overcome these.</p> <p>In contrast, Wandsworth Council are proposing a more onerous approach to the affordable housing requirements drawn down from a B2R proposal by seeking a tenure split of 50% low cost housing and 50% intermediate products.</p> <p>The whole plan viability study identifies this as having a viability impact, noting that it is unviable in the base case (paragraph 7.14). It recognises that this would potentially risk the delivery of this type of scheme. As such flexibility within Local Plan to allow for less burdensome policies, such as the overall housing rate and/or tenure with such schemes is proposed.</p> <p>We do not consider that the financial implications of the policy have been sufficiently tested to evidence a departure from the London Plan and National Policy. In addition, the policy does not recognise (the many) circumstances where registered providers are unwilling or unable to manage affordable homes in a B2R development.</p> <p>To resolve our concerns, the following modifications are proposed.</p>

	<p>Policy Reference</p> <p>LP30 – Built to Rent</p> <p>Proposed Modification</p> <p>1. Where a development has potential to include more than one residential core and/or block, applicants should <u>may consider the use of</u> this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Fast Track Route, 50 per cent of the overall affordable housing requirement should be provided as low-cost products within this separate core and/or block, with the remaining 50 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If the above requirements are not met, the scheme must follow the Viability Tested route. In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole.</p> <p>2. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design, <u>viability or deliverability</u> terms to include a separate residential core and/or block in the development proposal; or <u>it can be evidenced that a registered provider cannot or is unable to manage the low-cost products</u>, the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy. To follow the Fast Track Route, the Council will seek 30 per cent of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If these requirements are not met, the scheme must follow the Viability Tested route.</p> <p>3. Build to Rent housing should <u>seek to</u> provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).</p> <p>Justification</p> <p>To ensure consistency with LP Policy H11 and National Policy NPPF paragraph 65, and NPPG Paragraph: 002 Reference ID: 60-002-20180913.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The supporting text sets out the Council's preference, where possible, to secure low cost rented housing through BtR schemes, allowed for by London Plan para 4.11.10. Under these circumstances, criterion A.1 would apply, and reference to an RP is relevant and necessary, alongside the reference, in design terms, to a separate block which is designed to aid management.</p> <p>The policy is considered to be clear in its approach to the BtR sector and positively worded. London Plan policy H11 is clearly referenced as a starting point, but the Council seeks to determine locally relevant criteria as allowed for within the London Plan.</p> <p>The Plan already recognises the potential viability issues within the lower values areas expressed by the evidence (WPVA) by seeking low-cost rent 'where possible. Criterion (e) of policy LP24 ensures that the policy is applied on a site by site basis and considers context, need and viability.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole

	Forster
Agent Organisation Details	Director Savills
Comment ID	533
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Introduction</p> <p>1.1 The representation follows a Regulation 18 Pre-publication Local Plan representation by Thames Water Utilities Ltd ('Thames Water') in February 2021. Although the Local Plan has developed in its detail, a number of requests made by Thames Water within the previous representation remain unchanged. This representation seeks to reiterate these requests, whilst also providing comments on other relevant policies and text.</p> <p>1.2 A separate representation has been made by Thames Water Utilities Limited in regard to Thames Water's function as a statutory undertaker for the provision of clean and waste water services.</p> <p>1 Bazalgette Tunnel Limited ('Tideway')/Thames Water</p> <p>2.1 Bazalgette Tunnel Limited (trading as Tideway) is the company delivering the construction of the £4.3bn Thames Tideway Tunnel. The Tunnel is being implemented under a Development Consent Order - The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 ("DCO") – enacted on 3rd September 2014 and which came into force on 24th September 2014. Several sites and land parcels were acquired for the project between 2012 and 2015, and preparatory work for construction of the project began in</p> <p>1 2015. Work is now substantially advanced at 24 sites in Lond Construction of the project is anticipated to be completed in 2025.</p> <p>2.2 London's sewer system carries both foul sewage and surface water, largely making use of the hidden culverted rivers. The original Bazalgette sewage system, built more than 150 years ago, intercepted the old rivers at various points across London – notably along London's embankments (newly built to accommodate them) and diverted combined sewage outflows to the main sewage treatment works downstream to the east of London.</p>

2.3 The development of the city has inevitably increased the quantity of sewage in the system beyond anything that might have been envisaged 150 years ago. The Thames Tideway Tunnel is a 25km 'super sewer' under the Thames, with a 7.2m internal diameter, to intercept spills and to hold storm discharges in the tunnel until it can be emptied and treated by Beckton Sewage Treatment Works. This will improve the quality of the River Thames and its environment.

2.4 Some of the land acquired temporarily or permanently for the purposes of constructing the tunnel will ultimately be available for development, and this will include areas of public realm. Areas within these sites will be retained by Thames Water as operational land for access and operation and maintenance throughout the lifetime of the infrastructure. This land will continue to be subject to the safeguarding included in the Article 52 of the DCO.

2.5 The main Thames Tideway Tunnel sites within the London Borough of Wandsworth include:

- Barn Elms
- King George's Park
- Dormay Street
- Falconbrook Pumping Station
- Kirtling Street
- Heathwall Pumping Station

2.6 We have included plans of the sites within the body of this letter to which these representations relate for ease of reference. These will also be provided to the Council in a larger format.

2.7 Both through the Thames Tideway Tunnel project and the wider estate, Thames Water owns and operates a substantial amount of land and water assets for the public good. It also has a responsibility to create value for its customers by utilising land in London and the south east of England for alternative uses where this can be done without harming or adversely affecting its operations as a Statutory Water Company.

2.8 The Government and Mayor of London are looking to utilities organisations such as Thames Water to make a contribution to the development of the City through the use of brownfield land. Such development has the joint benefit of delivering new homes and employment opportunities whilst also contributing to the enhancement of the water infrastructure in London and the South East.

1 National Planning Policy Framework

3.1 The National Planning Policy Framework (NPPF) sets out that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). The NPPF sets out the contribution that should be made by Plans (paragraph 15), whilst Paragraph 35 sets out that Plans are sound if they are positively prepared, justified, effective and consistent with national policy.

3.2 Much of the land controlled by Thames Water in Wandsworth comprises brownfield land in highly sustainable locations. This is generally suitable land for development as set out in paragraph 119 of the NPPF which requires policies to make as much use as possible of previously-developed or 'brownfield' land. Paragraph 120(a) states that planning policies and decisions should "encourage multiple benefits from both urban and rural land, including through mixed use schemes" and (c) "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs."

1 General

4.1 The Thames Tideway Tunnel project comprises important city-wide infrastructure that has multiple benefits to the population and environment of London. Therefore we welcome and support the recognition of the Thames Tideway Tunnel in paragraph 11.8, Policy PM9 (9.) and Policy LP23 section D of the Local Plan Review. This complies with paragraph 20(b) of the NPPF which requires strategic policies to make sufficient provision for infrastructure. Thames Water is committed to working with the Council to deliver the new public spaces and new public realm that is included on the Thames Tideway Tunnel project.

4.2 However, we note that the following text from Policy LP23 (now LP22) Utilities and Digital

Connectivity Infrastructure has been removed from the Regulation 19 plan;

"The Council will work with Thames Water and Bazalgette Tunnel Limited to support the timely implementation of the Thames Tideway Tunnel project, including the connection of the combined sewer overflows in the borough in accordance with The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended."

4.3 Given the significance of the Thames Tideway Tunnel infrastructure and in accordance with paragraph 20(b) of the NPPF, Thames Water respectfully request that the above text be re-introduced to Policy LP22.

4.4 The key areas of interest to Thames Water within the Local Plan Review are set out below in separate sections for ease of reference. These are:

- Wandsworth Town (with particular reference to Frogmore Quarter)
- Nine Elms (Kirtling Street Cluster)
- Winstanley/York Road Regeneration Area (Falconbrook Pumping Station)
- Middle Wharf

	<p>4.5 We further note that in line with the public announcement made by Tideway on 24 August 2020, the handover date for the Thames Tideway Tunnel project is likely to be in the first half of 2025. We would therefore propose that all references contained in the Local Plan relating to completion of the Thames Tideway Tunnel project (including at paras 2.95, Spatial Strategy; 5.29 & 5.31, PM3 (Kirtling Street Cluster); paragraph 6.6, PM4 (Winstanley/York Road Regeneration Area) and para 11.8 and PM9 (Wandsworth Riverside)) should be amended to reflect the latest schedule and anticipated completion date of the Thames Tideway Tunnel project.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment agreed. Due to a publication error this paragraph was removed, and it is proposed to be reinserted into the Local Plan.</p> <p>It is proposed that all references to the timescales for the Thames Tideway Tunnel project in the Local Plan are updated to the correct date. However, this excludes suggested new references to PM3, PM4, PM9 as they do not contain reference to the completion dates.</p>
Proposed Change	<p>Amend wording of policy LP22 Utilities and Digital Connectivity Infrastructure as follows:</p> <p><i><u>"D. The Council will work with Thames Water and Bazalgette Tunnel Limited to support the timely implementation of the Thames Tideway Tunnel project, including the connection of the combined sewer overflows in the borough in accordance with The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 as amended."</u></i></p> <p>Amend wording in paragraph 2.95 as follows:</p> <p>'2.95 ... The area that surrounds Kirtling Street and Cringle Street are among the least developed of the whole VNEB Opportunity Area; a result of the ongoing occupation of the area by the Thames Tideway Tunnel Kirtling Street works, which are estimated to be finished by 20254...'</p> <p>Amend wording in paragraph 5.21 as follows:</p> <p>'5.21 ... Existing uses comprise a Thames Tideway Tunnel worksite (until 20254), a waste transfer station and commercial uses.'</p> <p>Amend wording in paragraph 5.29 (bullet point 2) as follows:</p> <p>'5.29 ... Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water. The construction of the Thames Tideway Tunnel site at Kirtling Street is estimated to be completed in early 20254and the Council will continue to work with Tideway to ensure a positive lasting legacy.'</p> <p>Amend wording in paragraph 6.63 (bullet point 2) as follows:</p>

'The construction of the Thames Tideway Tunnel site to the north of the Site Allocation (at Falconbrook Pumping Station) is programmed for completion in early 2025~~4~~ and the Council will continue to work with Tideway to ensure a positive lasting legacy'

Amend wording in paragraph 11.8 as follows:

'11.8 One of the largest sewer infrastructure projects in Europe, the Thames Tideway Tunnel, is currently being built with its main shaft site located in the riverside area of Kirtling Street, Nine Elms. Due for completion in 2025~~4~~ the sewer will replace London's 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year.'

Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	534
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy PM1 – Area Strategy and Site Allocations Compliance</p> <p>5.1 As set out below Thames Water sites are all located within areas which include Area Strategies or site allocations. Whilst Thames Water support the Council's aspirations of the Placemaking, Inclusive Growth and People First principles referenced in the policy, they would specifically comment on criteria C. of the policy which relates to Masterplans or Concept Frameworks.</p> <p>5.2 Thames Water have sites in both the Frogmore and Kirtling Street clusters and whilst they support the idea of a masterplan or concept framework across clusters, we make reference to Paragraph 3.28 of Policy PM1, which rightly references <i>"that some sites within clusters will be within different ownerships and may come forward as individual planning applications"</i>. With this in mind, we would state that given the disparate and complex land ownerships which form these clusters, the expectation of landowners and developers to work together to prepare a Masterplan or Concept Framework is not always feasible or realistic, this is because timescales bringing forward complex brownfield sites vary significantly, as does the planning status of certain sites within clusters (i.e. some sites may already benefit from planning permissions and therefore will inevitably have a shorter timescale to delivery than a site without). We would therefore request that this expectation made more flexible to reflect the overarching policy aim which is to ensure development comes forward in a coherent manner across an area to create the optimum places. Therefore the policy should be softened and edited to read:</p>

	<p><i>"In order to ensure that a comprehensive and cohesive approach is taken to the planning and delivery of sites identified as a cluster within an Area Strategy in the interest of good placemaking. If feasible and reasonable the Council will expect site owners to consider and have regard to the overall design, layout and character of an area, which could include jointly preparing a masterplan or concept framework. Planning applications will need to demonstrate how they comply with the overarching Area Strategy and Masterplan or Concept Framework (if applicable). On sites within and outside of clusters, planning applications should demonstrate how the proposal will not prejudice the development of sites within the cluster or adjoining sites."</i></p>
Change(s) considered necessary	<p>Summary and Suggested Changes</p> <p>5.3 Thames Water broadly support Policy PM1 but suggests the following changes:</p> <ul style="list-style-type: none"> - Remove or amend the text which requires site owners to jointly prepare a masterplan or concept framework.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The expectation is that a masterplan or concept framework is undertaken, and it is considered that the amendments drafted by Thames Water could undermine the expectation to seek to ensure a comprehensive approach is taken to area wide development.
Proposed Change	No change considered necessary.

Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	535
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>6. Policy PM2 - Wandsworth Town Place Based Policy – Frogmore Cluster</p> <p>6.1 The key area of relevance to Thames Water is the Frogmore Cluster. This comprises brownfield land within a sustainable location and is therefore an appropriate location for development according to the NPPF (see above).</p> <p>6.2 We welcome the sections of Policy PM2 that support and protect the Thames Tideway Tunnel structures and easements.</p> <p>6.3 Thames Water owns land at Dormay Street fronting Bell Lane Creek and leases part of the adjoining Wandsworth depot land. This site is being used to intercept the existing local combined sewer overflow and to connect it to the main tunnel. It is also used to drive a longer connection tunnel (Frogmore)</p> <p>6.4 There is a main shaft near to the centre of the works site, and most of the connection and air handling and control infrastructure is situated to the west of the shaft. The layout is shown on Plan 1, below.</p> <p>6.5 Once completed, Thames Water will require regular access to the component parts and Tideway will require substantial access every ten years to carry out maintenance and repairs to the shaft and tunnel (blue and green areas on Plan 1).</p> <p>6.6 Once the Thames Tideway Tunnel construction work at Dormay Street is complete, there will be an opportunity for development of part of the site, notably to the east of the shaft (broadly the area in yellow on Plan 1). However, as shown in the plan above, this should not impact the parking access that may be required during the 10-yearly tunnel maintenance. The operating site (green area) may present opportunities to deliver new public realm fronting Bell Lane Creek (except during operating and maintenance periods). Whilst Thames Water are not against new open space, any new area would need to respect the operation and maintenance requirements of the Thames Tideway Tunnel infrastructure. It is also worth noting that the frontage facing Bell Lane Creek (within the blue area) needs to be retained for Thames Tideway Tunnel infrastructure maintenance on a bi-monthly basis and any new route would need to ensure that the infrastructure is maintainable.</p>

6.7 We also note the indicative location for a new public open space north of Dormay Street.

The indicative location is the only part of the land fronting Bell Lane Creek that is developable. Albeit, development should not impact the possible parking access required during the tunnel maintenance. Given the possibility that the yellow area in Plan 1 could be developed, Thames Water would suggest that this proposed open space be moved to the west to coincide with the proposed Thames Tideway Tunnel access shaft (overlap blue and green areas on Plan 1) which could deliver an area of open land (except during occasional maintenance access) that we believe could function as public open space for the majority of the time. This would enable the most efficient use of land in the area, combining the efficacy of use of developable land whilst maximising public access to Bell Lane Creek.

6.8 We also would specifically reference the suggested/proposed new route along the frontage of Bell Lane Creek which could be impacted by the access required for the bi-monthly maintenance of the blue area within Plan 1. This is also recognised in Paragraph 4.66 of Policy PM2, which relates to a riverside walk along Bell Lane Creek. In this respect, the policy should state that the suggested/proposed new route or riverside walk should not impact the maintenance required for the Thames Tideway Tunnel infrastructure.

6.9 Thames Water have also advised that the area around the Thames Tideway Tunnel access shaft needs to be hard surfaced for maintenance purposes and clarification of this point should be included within Policy PM2.

6.10 These public realm improvements are likely to need to be funded by development in the wider policy area because development in the Frogmore Cluster itself is likely to be lower value (if it is already cross subsidising employment uses). In this respect, it is considered that text should be added which states that financial contributions will be sought from developers (through CIL or S106 Obligations) to fund the public realm improvements, in line with emerging Policy LP20 (New Open Space) and LP62 (Planning Obligations).

6.11 The Frogmore Cluster site allocation seeks to replace and intensify the existing quantity of industrial and office floorspace with light industrial and office workspace for cultural and creative industry SMEs alongside public realm improvements. The Thames Water ownership falls within areas labelled WT5 and WT6. In WT5, the emerging plan seeks at least a 25% increase in the amount of industrial and office floorspace. In WT6, the emerging plan seeks to replace the existing quantity of industrial floorspace.

6.12 We generally support this approach and welcome the potential for mixed use (including residential) development in the Frogmore Cluster that has been recognised in this revision of the plan. This will improve the viability of development in this area, and it is highly likely that to support viability, employment uses will require cross subsidy from residential uses.

6.13 As noted with the previous Regulation 18 representation, there is currently a temporary pedestrian bridge connecting the site offices and the Tideway construction site. This could be left in situ for a replacement bridge to be installed and would be an appropriate location for a new crossing to the Causeway Island. This approach is consistent with the Policy PM2.

6.14 Since the previous Regulation 18 consultation, the Wandle Delta Masterplan SPD ('the SPD') has been adopted in September 2021. Savills made representations on behalf of Thames Water for this document. The Regulation 19 Local Plan states that:

"The Wandle Delta Masterplan SPD has been produced to provide further guidance on the development of mixed-use development expected within this area over the plan period."

6.15 In this respect, Thames Water support that the SPD has been produced to provide further guidance, however would like to point out some matters which need to be taken into consideration and ensure that the relationship between the Local Plan and SPD is consistent.

6.16 Firstly, the SPD includes two industrial buildings (shown with green and red dots below) in areas WT5 and WT6 of the Frogmore Cluster site allocation. As noted above in Plan 1 and the associated text, the areas that the buildings are located within will be required for bi-monthly maintenance (green dot) or parking for 10-yearly tunnel maintenance (red dot).

6.17 Taking the above into consideration, Thames Water would request that text should be added to clarify that due to Thames Tideway Tunnel infrastructure and future maintenance, built form is most likely not applicable in these locations. This point is more important for the 'green dot' area of proposed built form (due to the bi-monthly maintenance).

	<p>6.18 Secondly, we would also point out that the suggested location for new public open space (just above no.5 in the plan above) is in a similar location to the built form ('red dot') in the SPD above and there is inconsistency between the Local Plan and the SPD which should be rectified in the Local Plan.</p> <p>6.19 With the above public realm and built form comments in mind, Thames Water would welcome further discussion with the Council on how best this can be shown on the spatial area map, and ensure policy does not conflict with the Thames Tideway Tunnel operation and maintenance.</p> <p>6.20 Finally, paragraphs 4.56 and 4.57 describe the WT5/WT6 site allocations and state that Dormay Street infrastructure is located within them. In this respect, we would request that these paragraphs specifically reference the <i>"Thames Tideway Tunnel infrastructure, where access will be required for ongoing operation and maintenance"</i>.</p>
<p>Change(s) considered necessary</p>	<p>Summary and Suggested Changes</p> <p>6.21 Thames Water broadly support Policy PM2 but suggests the following changes:</p> <ul style="list-style-type: none"> • Clarity over the use of CIL and planning obligations for funding public realm improvements, which may not be deliverable if required to be solely funded by the Frogmore Quarter development sites ; • Clarification of location of open space and riverside walkway, and consideration of how this will co-ordinate with the Thames Tideway Tunnel access shaft and on-going operation and maintenance requirements; and • Clarification that built form should not be located in areas required for the on-going operation and maintenance of Thames Tideway Tunnel infrastructure; and • Recognition of Thames Tideway Tunnel infrastructure in Paragraphs 4.56 and 4.57.
<p>Wishes to attend Hearing Session</p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p>Reason why</p>	
<p>Council Response</p>	<p>Comment noted. The position of the open space as shown on Map 4.1 Spatial Area Map: Wandsworth Town is considered appropriate as it connects with the proposed new bridge and existing green and blue infrastructure. The Wandle Delta Masterplan SPD (2021) sets out a requirement for open space at this site, however, it should be noted that it envisions an area of open space but not necessarily an area of green space as it would have to be suitable for the operational requirements of Thames Water regarding the access and maintenance of the shaft. This is additional space to that of the area above the shaft access point. It is considered that the wording of para 4.59 (Site Allocation) already identifies the importance of access and maintenance needs. However, to ensure greater clarity, it is proposed that para 4.66 could be amended to incorporate the maintenance access requirements.</p> <p>The site allocation is considered sound however greater clarification could be added and an amendment made to para 4.62 Open Space.</p> <p>This inclusion would be a duplication of an existing policy LP62 Planning Obligations and would not be consistent with how site allocations have been prepared.</p> <p>The retention of the temporary replacement bridge would be in keeping with the Wandle Delta SPD and could be included in paragraph 4.66 to ensure consistency with other Local Plan documents. Greater clarity could be added to this paragraph to ensure the locations of each bridge are understood.</p> <p>The wording of the site allocation is considered sound but could be amended to provide greater clarity.</p> <p>Map 4.1 Spatial Area Map: Wandsworth Town identified a suggested location for new public open space which is in line with the SPD which in Figure 43 shows a matching proposed area of open space. The location of the built form will be subject to further detailed assessment as part of a planning application, and it would be expected that open space is accommodated as part of a proposal in accordance with the Area Strategy.</p> <p>Those cluster descriptions are intended to be descriptive and not instructive. The requirement for access for ongoing operation and maintenance has been made in paragraph 4.63.</p>
<p>Proposed Change</p>	<p>Amend wording of paragraph 4.66 as follows:</p> <p>"4.66 Movement: A riverside walk incorporating provision for cyclists will be required on both sides of Bell Lane Creek. The new walk should incorporate riverbank improvements to enhance biodiversity <i>but should not impact the maintenance access requirements for the Thames Tideway Tunnel infrastructure</i>. New connections to the riverside walk, in particular; access under the railway bridge and bridge crossing to Causeway Island will be sought".</p> <p>Amend wording of paragraph 4.62 as follows</p>

"4.62 Open Space...Another area of open space should be created at the northern end of Dormay Street adjoining Bell Lane Creek (WT5), with a new bridge linking this to the proposed open space on Causeway Island. *Hard landscaped open space is required around the Thames Tideway shaft. The use of soft landscaping should be used where it is possible*".

Amend wording to paragraph 4.66 bullet point 2 as follows:

"Provision should be made for the *retention and making permanent of the existing temporary active travel bridge to the northeast of Dormay Street* installation of an active travel bridge to cross Bell Lane Creek from the northern end of Dormay Street to the Causeway Island site (WT3). Provision should be made for another *A second* active travel bridge crossing Bell Lane Creek immediately south of the railway viaduct to Causeway Island (WT3) from the Frogmore *Depot* site (WT6) should also be provided. This active travel bridge will then lead *across Causeway Island to a third active travel bridge which connects to the Gasholder Cluster (WT4) as well as* to the riverside walk and then *which leads* north, under the viaduct, to the Thames Path. A final footbridge should be added on the eastern edge of the proposed open space at the northern end of Dormay Street (WT5) which connects *eastwards* to the Gasholder cluster to the east (WT4)."

Amend wording of paragraph 4.65 as follows:

"4.65 Built Form ... New development should consider the *setting of Wentworth House as well as* the Thames *Tideway* Tunnel structures, and easements and *space required for future maintenance where built form will likely not be appropriate* the setting of Wentworth House.

Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	536
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy PM3 - Nine Elms – Kirtling Street Cluster</p> <p>7.1 Thames Water controls land within the Kirtling Street /Cringle Street Riverside site. Kirtling Street is the central point of the 25km super sewer and is the largest site on the entire Tideway project. From Kirtling Street, Tideway is tunnelling east to Chambers Wharf and west to Carnwath Road, connecting the sites along the route.</p>

7.2 Thames Water is predominately concerned with the Kirtling Street Cluster (which is discussed in paragraph 5.12 of Policy PM3). Once the Thames Tideway Tunnel is operational, access will need to be maintained to the shaft area (within Kirtling Wharf, Site Allocation NE9) and there will also be some above ground infrastructure (ventilation, kiosk and electrical substation). As noted in the Regulation 18 representation, Thames Water would welcome the discussion with the Council on the precise location for the suggested public open space that appears to be proposed within Kirtling Wharf. We generally welcome the opportunity to work with the Council to ensure a positive lasting legacy.

7.3 We request that text should be added to paragraph 5.12 to ensure that future development does not impact the operation and maintenance of the Thames Tideway Tunnel infrastructure.

7.4 As shown on the plan above, the Thames Tideway tunnel is located further eastwards than is currently shown on the draft Local Plan Map 5.3 *Spatial Area Map: Kirtling Street Cluster*. We therefore request that the location of the tunnel is correctly labelled on the map.

7.5 We would also reference the Thames Tideway Tunnel maintenance requirements as labelled above within Plan 5. In this respect, Thames Water would like to clarify that the surface of the shaft is within the safeguarded wharf area and therefore (given this designation and the physical operation and maintenance requirements of this infrastructure), it is unlikely that a landmark building/green public space will be entirely feasible on the northern section of the Kirtling Wharf (NE9) site without further detailed planning and engineering assessment to a greater level of detail than the Local Plan can undertake. Whilst built development could be achieved on southern area of the site, it would need to ensure operation and maintenance of the Thames Tideway Tunnel and protected wharf (shown in Plan 5 above).

7.6 Paragraphs 5.28 and 5.30 refer to the provision of open space in connection with the Nine Elms Pimlico Bridge ('the bridge'). As noted above, given the surface of the shaft will be designed for wharf usage, it is unlikely that soft-landscaped public space would be applicable in this area. However, Thames Water is able to engage with the Council regarding the delivery of open space, subject to the protection of operation and maintenance of the Thames Tideway Tunnel. We would also like to ensure that the policy is suitably flexible in the instance that the bridge does not come forward within the plan period, to avoid sterilising land unduly.

7.7 We support the concept of business uses on the ground floor and residential use to upper floors. This area comprises brownfield land within a sustainable location and is therefore an appropriate location for development according to the NPPF (see above). However, we also note that a new planning permission (Ref: 2021/0414) has been approved for the Battersea Power Station site. This includes more flexibility to uses on the ground and upper floors within the future phases (4-7). The Kirtling Street Cluster includes three sites within these future consented phases and it is considered that it should be correctly referenced within Policy PM3 to align with other sites within the cluster.

7.8 The Local Plan is right to recognise that the Kirtling Street areas are among the least progressed (in terms of development potential) of the whole VNEB OA (Paragraph 2.95). It is also right that maximising the potential for the Kirtling Wharf and Cringle Dock sites will require close consultation with the relevant parties. The Tideway Tunnel and safeguarded wharves will affect the possible level of development on those sites but examples elsewhere on the River Thames have demonstrated that mixed use development can be planned in close proximity to a working wharf.

7.9 We would also like to point out a discrepancy with the Policy NE9 allocation boundary. In this respect, the bottom right hand corner of the site (currently not allocated), should be allocated to coincide with the Safeguarded Wharves Directions map from February 2021.

7.10 Furthermore, within the 'People First' point (C. 5.) of Policy PM3, there is specific reference to the Thames Path along the riverside. Whilst Thames Water support the continuity of the Thames Path, they request that text should be added which refers to the Thames Tideway Tunnel infrastructure. In this respect, the paragraph should be amended to read:
*"The continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area, and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves **and Thames Tideway Tunnel infrastructure**. Continuity of the Thames Path should be complemented by the creation of high-quality and generous public realm, achieving a balance of open space and built form, and making provision for trees of an appropriate maturity and species."*

7.11 Additionally, Paragraph 5.38 relates to context within the Kirtling Street Cluster and states that taking a place-based approach is necessary. In this respect, we would refer back to the comments on Policy PM1 and how due to the complex land use ownerships of the sites, it is unlikely that a site-wide masterplan or contextual framework approach will be feasible given the planning statuses of the land within the cluster.

7.12 Further to the Regulation 18 consultation, we would also like to reiterate the below sites and request an explanation on why they are no longer allocated for development:

- Kirtling Street (88 Kirtling Street), Phase 7 (RS-WF)
- SE corner of Kirtling and Cringle Street (Depot Site), Phase 5 (RS-6a)
- Former petrol station site (2 Battersea Park Road), Phase 5 (RS-6b)

7.13 The sites all comprise brownfield land that is entirely suitable for development. Our assumption is that these sites have been removed as they now have planning permission via the outline planning permission granted to 'REP (Power Station) Ltd' under the Battersea Power Station Masterplan originally approved in August 2011 (most recently updated in via a S73 in September 2021). Following the recent planning permission (Ref: 2021/0414) that has been approved, these three plots have outline permission for a combined total maximum GIA of 62,853sqm. Maximum building envelopes have also been approved.

7.14 With the above in mind, it is considered that the Local Plan needs to be flexible (see NPPF paragraph 82d) and allow for changes in economic circumstances. Given the scale and changing nature (as noted above) of the Battersea Power Station project, there may be an opportunity to consider how these sites come forward once the Thames Tideway Tunnel works are completed. There is also the added complication of the northern line extension works under part of the land. In our view it would be better for the allocations to remain in the Local Plan to ensure that a robust policy context remains.

7.15 Thames Water also operates the Battersea Ring Main site at Cringle Street. As noted within the Regulation 18 Representation, there could be a future opportunity to rationalise land uses and as a result, part of the site could be suitable for development (subject to technical matters being resolved). It is previously developed land in a highly sustainable location and could make a positive contribution to the wider Nine Elms development. The site is also located within a tall buildings area (TB-B3-01) and could come forward as a windfall site during the plan period. We would welcome further discussions with the Council about whether this site might be included as an additional mixed-use allocation in the Local Plan. The potential allocation area is shown on Plan 2, below.

7.16 With the above public realm and built form comments in mind, Thames Water would welcome further discussion with the Council on how best these can be reflected on the spatial area map, to ensure policy does not conflict with the Thames Tideway Tunnel operation and maintenance.

**Change(s)
considered
necessary**

Summary and Suggested Changes

7.17 Thames Water broadly supports Policy PM3 but suggests the following changes:

	<ul style="list-style-type: none"> - Inclusion of text to advise that public open space/landmark buildings will only be applicable on-site allocation NE9 if they do not interfere with the Thames Tideway Tunnel or safeguarded wharf; - Inclusion of flexibility of ground and upper floor uses within the Kirtling Street Cluster - Reinstatement of flexible mixed use site allocations for Kirtling Street sites (88 Kirtling Street, Depot Site and Former petrol station site); - Inclusion of Thames Tideway Infrastructure maintenance requirements for the Thames Path; and - Additional allocation of the Thames Water Ring Main site at Cringle Street.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. A continuation of the Thames Path is sought to the northern part of Cringle Dock which will include public realm enhancements where possible. The northern side of Kirtling Wharf will require appropriate public open space as part of the Thames Tideway access shaft, the continuation of the Thames Path, and the landing point for the proposed Nine Elms Pimlico Bridge. The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the exact location of the open space.</p> <p>The wording in paragraph 5.12 is considered sound and other paragraphs, including 5.30, have been suggested for amendments to reinforce this requirement.</p> <p>The map 5.3 is considered sound but could be amended to provide greater clarity as to the exact location of the open space.</p> <p>Including the notes shown in Plan 5 would be inconsistent with how the rest of the maps have been produced. The necessary information from the labels is captured elsewhere in the plan.</p> <p>Open space, not necessarily green space, is proposed to the north of the cluster. Para 5.39 sets out that a landmark building would be appropriate as it is near the foot of the proposed Nine Elms – Pimlico Bridge. This would be subject to the maintenance and access requirements as proposed elsewhere in the Allocation. . Protection of the safeguarded wharf uses is set out in para 5.27.</p> <p>The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.</p> <p>Para 5.30 sets out a requirement for open space which can be in the form of hard and/or soft landscaping. It would be preferable to include soft landscaping to maximise the amount of green space and biodiversity adjacent to the River Thames but the requirements of the wharf and the maintenance and access requirements of the Tideway Shaft would need to be considered. The Nine Elms-Pimlico Bridge is still considered to come forward, and any uncertainty about it coming forward should not restrict development as the open space above the shaft site is still expected to integrate into the Thames Path and the NESB Cycling Strategy.</p> <p>It is considered appropriate to amend the wording of the Local Plan to ensure consistency with the permitted application (2021/0414). This should include reference to the July 2021 Design Code.</p> <p>The site allocation boundary could be amended to align with the Safeguarded Wharves Directions (February 2021).</p> <p>The wording in the policy is considered sound but could be amended to provide greater clarity as to the protection of Thames Tideway Tunnel Infrastructure.</p> <p>The expectation is that a masterplan or concept framework is undertaken, and it is considered that the amendments drafted by Thames Water could undermine the expectation to seek to ensure a comprehensive approach is taken to the delivery of adjacent sites.</p> <p>These sites were removed as they have outline planning permission and the site owners explained to the Council that they did not wish for the sites to be included as site allocation in this local plan.</p> <p>This point was missed at the regulation 18 stage of consultation and would have met the necessary criteria to be included as a site allocation in line with the site allocation methodology paper. To ensure consistency with the rest of the Local Plan site allocations the Battersea Main Ring site could be included as a site allocation.</p>

Map 5.3 Spatial Area Map: Kirtling Street Cluster identifies the access point of the Thames Tideway Tunnel shaft which ensures it is considered with any new development in the area. Paras 5.27 and 5.31 make reference to the importance of the shaft site but para 5.30 could be amended to ensure the policy does not conflict with the Thames Tideway Tunnel operation and maintenance.

Proposed Change

Amend wording to paragraph 5.30 as follows:

"5.30 Proposals to the north of the cluster in ~~at~~ the Kirtling Wharf and Gringle Dock sites (NE9, NE11) will be required to provide appropriate public open space that connects to the proposed Nine Elms Pimlico Bridge, ~~and~~ the Thames Path subject to the operation and maintenance requirements of ~~and the open space above~~ the Thames Tideway Tunnel access shaft."

Amend Map 5.3 Spatial Area Map: Kirtling Street Cluster as follows:

- Amend Map 5.3 to show the Thames Tideway Tunnel Shaft in the north east corner of NE9 Kirtling Wharf as correctly shown in Plan 5 of the Thames Water representation.

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Amend wording of paragraph 5.39 as follows:

"5.39 Identity and Architectural Expression ... It would be appropriate for a landmark building to be located here as a gateway into Wandsworth subject to the ongoing maintenance and access requirements of the Thames Tideway Tunnel's infrastructure as well as the requirements of the safeguarded wharf designation."

Amend paragraph 5.27 as follows: "The cluster is appropriate for a mixed-use development with commercial ~~uses on the ground floor~~, and residential uses. Ground floor uses should have consideration of ~~to upper floors due to~~ the proximity to heavily trafficked streets and flood zone parameters, and should accord with the relevant Design Code (July 2021, or successor document). Proposals for mixed-use development should retain or enhance wharf capacity..."

Amend Map 3.2 Site Allocation Map as follows:

- Amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Amend Map 5.1 Creative Clusters Map as follows:

- Amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Amend Map 5.2 Nine Elms Spatial Area Map as follows:

- Amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Amend Map 5.3 Kirtling Street Cluster. Spatial Area Map as follows:

- Amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

Amend Map 5.5 Kirtling Street Cluster Site Allocation Map as follows:

- Amend map and glossary to show updated boundary of NE9 Kirtling Wharf.

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Amend wording of PM3 Nine Elms - People First (5) as follow:

"PM3 - People First 5. The continuity of the Thames Path along the riverside is key to enhancing active travel and ease of movement in the area, and will be a requirement of development proposals around Kirtling St and Cringle St, whilst retaining service access to the Power Station and waste transfer station and protecting the safe-guarded wharves *and Thames Tideway Tunnel infrastructure.*"

Amend Nine Elms Cover Page as follows:

"NE11 Cringle Dock, Nine Elms

NE14 Battersea Ring Main Site, Cringle Street"

Amend wording of the site allocation titles as follows:

"NE11 Cringle Dock, Nine Elms, SW8

NE14 Battersea Ring Main Site, Cringle Street, SW8"

Amend wording of paragraph 5.20 as follows:

5.20 The Kirtling Street Cluster comprises five six sites ... The Cluster contains five six site allocations:

Amend wording of paragraph 5.21 as follows:

5.21... Existing uses comprise a Thames Tideway Tunnel worksite (until 2024), a waste transfer station and commercial uses. Site Area: 6.13 ha

Insert new paragraph after paragraph 5.26 as follows:

"NE14: This site is south of NE11 and Cringle Street and east of Battersea Power Station. It is west of Kirtling Street north of Pump House Lane."

Insert a new bullet point into paragraph 5.29 as follows:

5.29 Uses – New Bullet Point: Development on NE14 will need to account for and incorporate the existing Thames Water infrastructure within any mixed use development proposal.

Amend wording of paragraph 5.31 as follows:

5.31 Access - "... Additionally, *the Battersea Ring Main site includes access to the existing Thames Water infrastructure and* the Kirtling Wharf site (NE9) includes access to a Thames Tideway shaft site and ongoing maintenance access will be required *to both*. The *Thames Water infrastructure and the* shaft maintenance regime and associated necessary access should be considered as part of any development proposal *on either site*".

Amend Map 3.2 Site Allocation Map as follows:

- Amend map and glossary to show new allocation NE14

Amend Map 5.1 Creative Clusters Map as follows:

- Amend map and glossary to show new allocation NE14

Amend Map 5.2 Nine Elms Spatial Area Map as follows:

- Amend map and glossary to show new allocation NE14

Amend Map 5.3 Kirtling Street Cluster. Spatial Area Map as follows:

- Amend map and glossary to show new allocation NE14.

Amend Map 5.5 Kirtling Street Cluster Site Allocation Map as follows:

- Amend map and glossary to show new allocation NE14

See Appendix 1 of the Regulation 19 Response Table for illustration of proposed modification.

Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	537
Title	PM 4 Clapham Junction and York Road/ Winstanley Regeneration Area
Number	Policy 5
Soundness - Legally Compliant?	Yes

Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy PM4 – Clapham Junction and York Road/Winstanley Regeneration Area</p> <p>8.1 Thames Water operates Falconbrook Pumping Station, which powers part of the original Bazalgette sewage system. The Thames Tideway Tunnel works underway here are to intercept sewage overflows and connect them into the new 'super sewer.' Work here will complete in 2024/5.</p> <p>8.2 Whilst some infrastructure will be required to enable operation of the new pumping station, there may be an opportunity to achieve residential development above parts of the existing infrastructure – potentially with a landscaped podium over the yard area to screen it from the proposed new residential development. In this case a residential building in line with the proposed site allocation could be achieved.</p> <p>8.3 The plan of the Clapham Junction and York Road/Winstanley Regeneration Area identifies the pumping station as falling within the site allocation CJ5. It should also be noted that the site is located within the tall building zone (TB-B1-01).</p> <p>8.4 In principle, Thames Water supports Policy CJ5 Winstanley/York Road Regeneration Area.</p> <p>There could be potential for development in and around the Falconbrook Pumping Station in the future. However, the primary focus of both Thames Water and Tideway will be the retention and protection of the Thames Water asset, which provides critical drainage infrastructure to London, and of the Thames Tideway Tunnel shaft which is located outside of the pumping station boundary. Any proposed development in the York Road/Winstanley Regeneration Area must not be allowed unless it can be demonstrated that the development would not adversely affect the construction of the Thames Tideway Tunnel and/or the operational and maintenance and access required over the lifetime of both the pumping station and the Thames Tideway Tunnel infrastructure.</p>
Change(s) considered necessary	<p>8.5 The only requested change to Policy PM4 relates to Paragraph 6.7 which relates to the description of the York Road / Winstanley Regeneration Area. In this respect, Thames Water request that the following text is added which relates to the Falconbrook Pumping Station:</p> <p><i><u>"Thames Water's Falconbrook Pumping Station and associated Tideway Tunnel Infrastructure is located within the regeneration area. Any development will need to consider the operation and maintenance of this infrastructure."</u></i></p>
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment agreed. The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.
Proposed Change	Amend wording after para 6.7 as follows: <i><u>"Thames Water's Falconbrook Pumping Station and associated Tideway Tunnel Infrastructure is located within the regeneration area. Any development will need to consider the operation and maintenance of this infrastructure."</u></i>

Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	538
Title	NE10 Middle Wharf, Nine Elms, SW8
Number	Statement 33
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy NE10 - Middle Wharf</p> <p>9.1 As noted in the Regulation 18 representation, we support the site allocation and the identification of the site for residential led mixed-use development above commercial/business uses. This comprises brownfield land within a sustainable location and is therefore an appropriate location for development according to the NPPF (see above).</p> <p>9.2 As shown above, much of the land identified in NE10 (in green) is within a safeguarded wharf and is also the location of the main shaft at Heathwall Pumping Station, intercepting the two combined sewage outflows and connecting them to the main Thames Tideway Tunnel. There are also a number of maintenance and access requirements that are required for the Thames Tideway Tunnel infrastructure.</p> <p>9.3 Given that the Middle Wharf site allocation and adjacent area to the west will be required for maintenance, it is not considered that built form development in this location would be feasible. In this respect, we reiterate that the site allocation could be expanded to include land to the west to allow potential development. Again, given the maintenance requirements for the Thames Tideway Tunnel infrastructure, an area which could be suitable for residential-led, mixed-use development would be around and above the pumping station. In this respect, the proposed extension has been shown below in Plan 9.</p> <p>9.4 Further to the above, we would also comment on the site's omission from the TB-B3-01 Tall Building Zone. The site was included within the tall buildings map within the Regulation 18 consultation, however it has been omitted within the Regulation 19 information.</p> <p>9.5 With the above in mind, Thames Water request that the NE10 site (with extension) should be reintroduced into the tall building zone. Given that the site is located in close proximity to tall buildings to the west and south, it is considered to be in a location which would be suitable for a tall building and we are not clear on why it has been omitted from the zone. The Urban Design Study (December 2021) which is part of the Local Plan evidence base shows the site as within area B3 in the Sensitivity Plan (Fig.212) which is noted as having a 'lower' sensitivity to change, and a 'higher' capacity for development (Fig.214). The specific removal of this small area from the tall buildings zone as listed in Appendix A to the study is 'analysis of existing and consented buildings'. Indeed, the descriptive text for this zone (TB-B3-01) sets out that <i>'The general form of development that will be supported in the Opportunity Area will be 8-10 storey high density development with tall buildings within the 10-25 storey height range on key sites such as along the riverside.'</i> (emphasis added).</p>

9.6 Therefore, we consider that this site should still remain in the tall building zone of TB-B3-01, and any detailed design assessment made through the development management process to ensure that the height and scale of development is appropriate for the context and setting.

9.7 Finally, Paragraph 5.81 relates to the site allocation for the site, and Thames Water request that text should be added which refers to the maintenance of the Thames Tideway Tunnel infrastructure. In this respect, the paragraph should be amended to read:

*“Safeguarded wharf with potential for residential-led, mixed-use development above including commercial uses. Proposals for mixed-use development should retain or enhance wharf capacity and operability and maintain appropriate access arrangements. Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf. **Development should also consider the operation and maintenance of Thames Tideway Tunnel infrastructure.**”*

Change(s) considered necessary

Summary and Suggested Changes

9.8 Thames Water broadly supports Policy NE10 but suggests the following changes;

- The red line of the allocation area be increased as shown on Plan 7. The additional area identified in Plan 4 should be identified as suitable for a residential led mixed use tall building.
- The site allocation (including extension above) should be included within the TB-B3-01 Tall Building Zone.
- Paragraph 5.81 to include text on maintenance of the Thames Tideway Tunnel infrastructure.

Wishes to attend Hearing Session

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

Reason why

Council Response

Comment agreed. The site allocation is considered sound but it is proposed that the wording of the Development Considerations could be amended to provide greater opportunity for mixed use development as part of a combined site approach if possible in light of the constraints of the safeguarded wharf site.

Site NE10 (Middle Wharf) and the Heathwall Pumping Station are located on part of the Nine Elms riverside frontage that is located outside an area suitable for mid-rise or Tall buildings in accordance with the Urban Design Study. This location is one which is predominantly low-rise in character. New buildings in the Nine Elms area are expected to generally step down towards the riverside with Nine Elms Lane in the north-eastern part (i.e. where Middle wharf and Heathwall Pumping Station are located) considered to be an appropriate point to discontinue the Tall Buildings zone. This approach is emphasised in the adjacent tall buildings zone TB-B3-01, which shows a gradual lighter shading towards the riverside indicating less potential for height.

Figures 212 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity and probability of change / development capacity at a level of detail expected from a map of the borough. This is clarified in section 4.2 of the UDS: 'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality. There may be smaller scale highly sensitive areas (including for example locally listed parks and gardens) which are not illustrated in the borough-wide map but would be sensitive to change. These are generally noted in the valued features descriptions in the character area profiles.'

And in 4.3 (probability of change): 'This is not to suggest that all sites within this areas are acceptable for development; rather, that as a whole the likelihood of change is higher.'

	The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.
Proposed Change	<p>Amend wording to para 5.82 as follows:</p> <p><i>"5.82 Uses - Due to the heavily trafficked Nine Elms Lane, commercial uses are suitable on the ground floor. <u>Development of this site could extend westwards to include Heathwall Pumping Station, as part of a combined mixed-use proposal that didn't conflict with the wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf. Maximising the potential for this site will require further discussions with relevant parties, in particular the PLA and the GLA, and a co-ordinated approach including with the adjacent sites</u>".</i></p> <p>Amend wording to para 5.81 as follows:</p> <p><i>"5.81 Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf. <u>Development should also consider the operation and maintenance of Thames Tideway Tunnel infrastructure.</u>"</i></p>

Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	539
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy PM9 – Wandsworth Riverside</p> <p>10.1 Policy PM9 relates to the area of Wandsworth Riverside, where a number of Thames Water Tideway sites are located. Whilst Thames Water support the vision for the area, there are a couple of requested amendments which seek to correct dates and refer to maintenance requirements.</p> <p>10.2 With the above in mind, Paragraph 11.8 should be amended to read:</p> <p><i>“One of the largest sewer infrastructure projects in Europe, the Thames Tideway Tunnel, is currently being built with its main shaft site located in the riverside area of Kirtling Street, Nine Elms. Due for completion in 2025 the sewer will replace London’s 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year. The project, which has six large construction sites mainly located in the riverside area, will provide positive lasting legacy delivering environmental improvements, jobs, skills and economic investment. Alongside operation and maintenance requirements, the sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms (whilst maintaining safe access and operation of infrastructure). The Council will continue to work with Tideway to ensure its legacy is sustainable, ensuring that the relationship between the sites and their surroundings is developed in partnership with residents and community groups.”</i></p> <p>10.3 Point A.9. should be amended to read:</p>

	<p><i>"The Thames Tideway Tunnel project will be supported through to completion and beyond to create a sustainable and lasting legacy. For each site this will mean ensuring ongoing operation and maintenance; the protection and enhancement of the setting and character of the surrounding area; improvement of the environment both on site and its wider setting; providing economic and social benefits such as jobs and skills; and opportunities for the creation of public art and event space to allow for inclusive and varied use"</i></p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment agreed. The wording in the site allocation is considered sound but could be amended to provide greater clarity as to the timeline, operation and maintenance of the Thames Tideway Tunnel Infrastructure.</p> <p>The wording in the policy is considered sound but could be amended to provide greater clarity as to the operation and maintenance of the Thames Tideway Tunnel Infrastructure.</p>
Proposed Change	<p>Amend wording to para 11.8 as follows:</p> <p>"11.8 ... Due for completion in 20245 the sewer will replace London's 150-year-old sewer network and prevent tens of millions of tonnes of sewage from polluting the River Thames every year. The project, which has six large construction sites mainly located in the riverside area, will provide positive lasting legacy delivering environmental improvements, jobs, skills and economic investment. <i>Alongside operation and maintenance requirements</i>. The sites will be transformed into new public open spaces, including new promontories in the Thames at Putney embankment and Nine Elms (Heathwall Pumping Station), and opening up new areas of riverside walk in Nine Elms (<i>whilst maintaining safe access and operation of infrastructure</i>)".</p> <p>Amend wording to PM9 Wandsworth's Riverside - Placemaking 9 as follows:</p> <p>"9 ... For each site this will mean <i>ensuring ongoing operation and maintenance</i>; the protection and enhancement of the setting and character of the surrounding area; improvement of the environment both on site and its wider setting; providing economic and social benefits such as jobs and skills; and opportunities for the creation of public art and event space to allow for inclusive and varied use".</p>
Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	540
Title	LP35 Mixed-Use Development on Economic Land
Number	Policy 46
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No

If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy LP35 – Mixed-Use Development on Economic Land</p> <p>11.1 Policy LP35 concerns mixed-use development on economic land, including in Economic Use Intensification Areas (EUIAs) (Frogmore Cluster) and Focal Points of Activity (Kirtling Street). The policy states proposals for mixed-use development, including residential, will be supported where it meets the criteria for the relevant economic land designation within which it is located.</p> <p>11.2 In this respect, EUIAs in the Wandle Delta sub-area (including Dormay Street) are expected to provide at least a 25% increase in the amount of existing economic floorspace, whilst Focal Points of Activity should seek to maximise the re-provision of existing office floorspace.</p> <p>11.3 Whilst Thames Water support the policy in re-providing economic floorspace, it should be noted that a number of sites have specific site allocations which include a mix of uses, (including residential) and reference should be made within the policy which states that the provision of economic floorspace as part of mixed use developments on economic land should be consistent with specific site allocations.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	The Council welcome the support for the re-provision of economic floorspace in locations covered by LP35 (Mixed-Use Development on Economic Land). It is noted, however, that the Local Plan no longer seeks to designate Battersea Power Station as a Focal Point of Activity; rather, in accordance with the London Plan this area is designated as an emerging CAZ retail cluster. Policy LP35.A.2 already includes, with respect to Economic Use Intensification Areas, reference to the relevant Site Allocations. It is expected that the development should be brought forward in accordance with the Plan's requirements both for the general policies and the Site Allocations, and that the approach is consistent between them.
Proposed Change	No change considered necessary.
Consultee Full Name	Phoebe Juggins
Consultee Organisation Details	Property Planning Lead Thames Water Utilities Ltd
Agent Full Name	Nicole Forster
Agent Organisation Details	Director Savills
Comment ID	541
Title	LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses
Number	Policy 70

Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>1 Policy LP59 – Riverside Uses, Including River-dependent, River-related and adjacent Uses</p> <p>12.1 Policy LP59 relates to riverside uses and new development on sites adjoining the River Thames, River Wandle, and Beverley Brook. In this respect, given the importance of the Thames Tideway Tunnel Infrastructure and its location along the riverside in Wandsworth, it is considered that text should be added below point E., which concerns protected wharves. Thames Water would therefore request that the below text is added as F.</p> <p><i>“On riverside Thames Tideway Tunnel sites, future development on or adjacent to these sites should not jeopardise the operation or maintenance of the infrastructure.”</i></p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. It is considered that LP59 E sufficiently covers this requirement and the responsibility for any impact will be on the new development as the Agent of Change.
Proposed Change	No change considered necessary
Consultee Full Name	Ridan Realty
Consultee Organisation Details	
Agent Full Name	Jeff Field
Agent Organisation Details	Senior Director BNP Paribas Real Estate
Comment ID	542
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No

If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Local Plan Review (Regulation 19) Representations submitted on behalf of Ridan Realty – Thornsett Road LSIA</p> <p>We write to submit Representations on behalf of Ridan Realty in response to the Council's Local Plan Review (Regulation 19).</p> <p><u>THE REPRESENTATION</u></p> <p>We provide particular focus upon the Council's strategy towards LSIA's and policy LP34. Our Representations are that:</p> <ol style="list-style-type: none"> 1 a) the Council is missing the opportunity to plan positively b) the Plan does not comply with the 2021 London Plan 2 c) the evidence base is not supported by viability and therefore fails the test of deliverability d) the Council should separate out its stance between SILs and LSIA's 3 e) the Plan fails to make effective use of urban land <ol style="list-style-type: none"> 1 f) the Plan should not discourage residential uses within LSIA's <ol style="list-style-type: none"> 1 g) the Plan seeks to differentiate between Class E uses in its policy application and restricting flexibility by conditions, contrary to the intention within legislation <p><u>BACKGROUND</u></p> <p><i>Land Ownership</i></p> <p>Our client owns land that sits within the Thornsett Road LSIA (148-150 Penwith Road and 12-22 Thornsett Street).</p> <p>The location of the Site is shown by the highlighted building in Figure 1 below. It measures approximately 890sqm in size.</p> <p>The existing building is 'U' shaped, with continuous frontages to Penwith Road, Thornsett Road and the River Wandle. Between these there is an open lightwell providing light to the rear of each of these elements. Facing onto Thornsett Road, the ground floor is industrial but in a poor condition and is vacant. Facing the street at first floor, all of the accommodation is in residential use, by virtue of a Prior Approval decision given on 27 July 2017 (Planning application ref: 2017/0367). The entrance to this residential accommodation is also from Thornsett Road. The frontage to the Penwith Road accommodates entrances serving the ground and first and second floors of this part of the building. The ground floor is occupied with workshop, education and office use whilst the first floor fronting onto Penwith Road and the river is largely vacant. There is residential use on the second floor.</p> <p><i>Planning History</i></p>

There is a long and complex planning history in respect of the site.

Notably (as highlighted above), prior approval consent was granted on 27 July 2017 (Planning application ref: 2017/0367) for change of use from Light Industrial (Class B1c) to Residential (Class C3) to provide 3 x2-bedroom, 2 x1-bedroom and 1 x studio flats.

The Council will also be aware of the recently approved planning permission on appeal for two mixed-use development schemes within the Thornsett Road LSIA (*APP/H5960/W/19/3235607 and 3235608*), at 150A -170 Penwith Road and

2-8 Thornsett Road SW18 4QA, immediately to the east. Here, we summarise some of the Inspector's conclusions:

- the proposed developments would provide full replacement of existing B1(c) and B8 floorspace in accordance with paragraph 2 of policy EI6 (*para 11*)
- the Inspector also considered the unlikelihood of a viable re-development of the site comprising solely those industrial uses supported by EI6 (*para 13*)
- there was consideration of the impact of non-industrial uses upon the activities within the LSIA, in particular residential use was found acceptable as it was raised well above the road on level 2 (*para 14*)
- the proposals provided light industrial use rather than general industrial use (*para 15*)
- the proposals should be given very significant weight particularly in the context of the Council's strategic objective to encourage sustainable economic development (*para 17*)
- the situation does not constitute exceptional circumstances and it would be unreasonable and unnecessary to impose a condition to restrict B1(c) to such uses within Class E (*para 50*)

All of these reasons suggest that the Council should consider a more positive approach to development within the Thornsett Road LSIA and as set out under policy LP37.

NATIONAL PLANNING POLICY FRAMEWORK (2021)

Sustainable Development and Plan-making

The purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). Paragraph 9 states that planning policies and decisions should play an active role in guiding developments towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

Paragraph 11 sets out that for plan-making, the application of the presumption in favour of sustainable development means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.

Paragraph 15 states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Paragraph 16 states that Plans should:

be prepared with the objective of contributing to the achievement of sustainable development

be prepared positively, in a way that is aspirational but deliverable

be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees

Paragraph 35 sets out that Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

Building a strong, competitive economy

Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.....The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Efficient Use of Land

Paragraph 119 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or brownfield land

Paragraph 120 goes on to state that planning policies should (*inter alia*) encourage multiple benefits from urban land, including through mixed use schemes recognising that land can perform many functions; and support the development of under-utilised land and buildings, and airspace above existing commercial premises for new homes.

Under paragraph 122, Councils should reflect changes in the demand for land and reallocate land for more deliverable uses where there is no reasonable prospect of development coming forward for the use allocated in the plan.

Delivering a sufficient supply of homes

Paragraph 60 states that it is important that a sufficient amount and variety of land can come forward for new housing in order to significantly boost the supply of homes.

LONDON PLAN (2021)

Industrial intensification, co-location and substitution

The 2021 London Plan sets out an approach towards intensification and co-location of uses within LSIA's.

Under Policy E7, it states that intensification can be used to facilitate additional industrial capacity but also support the delivery of residential or other uses, such as social infrastructure, or to contribute to town centre renewal.

The Plan states that this approach should only be considered as part of a plan-led process or as part of a co-ordinated masterplanning process. At Figure 6.3, the London Plan provides simplified illustrations for LSIA consolidation.

It is not part of the London Plan to prevent residential use within designated locally significant industrial areas.

Optimisation of Previously Developed Land for Housing

Policy H1 of the New London Plan states that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans, especially on sources of capacity including (*inter alia*):

- a) 'sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary; and
- c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.'

In this respect, the Thornsett Road LSIA (and the Site itself specifically) is PTAL5, close to the Earlsfield Centre and the Earlsfield train station.

ANALYSIS

Our analysis based on the above shows that:

the Council is missing the opportunity to plan positively – it is clear from the London Plan, the NPPF and the AECOM Report that there is scope for intensification and that there are opportunities to introduce residential use. In our view this is particularly relevant to this specific area (as there is residential use already on the site, and residential use consented on the site immediately to the east).

the Plan does not comply with the 2021 London Plan – London Plan Policy E7 encourages specifically within LSIA's, that boroughs should take the opportunity to promote intensification and co-location of industrial and residential uses. The Council has failed to take advantage of this opportunity.

the evidence base is not supported by viability and therefore fails the test of deliverability – it is important that the Council undertakes viability testing of its planning policies.

the Council should separate out its stance between SILs and LSIA's – it is considered that in accordance with the New London Plan, the Council could offer greater flexibility for LSIA's rather than SILs. In this way, the SILs can continue to provide a reservoir of the heavier industrial uses.

the Plan fails to make effective use of urban land – by not adopting opportunities that could encourage other uses and by not considering viability (which could act as a deterrent to 'industrial' development), the Plan has failed to provide a context for re-cycling and making effective use of urban land.

the Plan should encourage residential uses where appropriate within LSIA's – the Local Plan could encourage housing provided the parameters and protections for the LSIA's match those of the 2021 London Plan.

the Plan seeks to differentiate between Class E uses in its policy application and by conditions, thereby restricting flexibility intended in legislation – it is questionable whether legally the Council's approach will be accepted. It proposes conditions limiting movement within Class E and suggests only certain activities within Class E are only suitable within the LSIA.

We consider that the Council will need to make fundamental changes to policy LP34 rather than our offering suggested changes at this stage. We welcome the opportunity for further discussions with the Council's Policy Team on how the Plan could be more positively prepared and be consistent with the 2021 London Plan and the NPPF.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The draft allocation includes detailed elements which merit discussion.
Council Response	<p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP34 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Circular Economy, Recycling and Waste Management), Part F specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>It is recognised that in the appeal decision referenced within the representation, consideration of the impact of non-industrial uses upon the activities within the LSIA was made, and the Inspector found that "the proposed non-industrial uses would...be unlikely to undermine the functionality or attractiveness of the industrial offer", however such considerations were made in the context of 'the proposed industrial uses' on the appeal site, rather than those within the LSIA as a whole. Furthermore, the appeal notes that the site proposals do "not include any general industrial use which would be more likely to generate levels of noise and disturbance to residential occupiers", whereas such uses form the mainstay of the borough's industrial need over the Local Plan period (as identified above).</p> <p>In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the provision of additional housing and office development. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.</p> <p>Furthermore, the Council does not agree with the assertion made in the representation that "the Plan does not comply with the New London Plan" with respect to Policy E7. Policy E7 states that in LSIS (the equivalent of the borough's LSIA), "the scope for co-locating industrial uses with residential and other uses may be considered", however it does not require such an approach. The supporting text notes that "some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses". As identified above, the demand for industrial uses identified within the borough's ELPS is predominantly derived from a demand for storage and distribution uses falling within use class B8.</p> <p>For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.</p>

Proposed Change

No change considered necessary.

Consultee Full Name	Ridan Realty
Consultee Organisation Details	
Agent Full Name	Jeff Field
Agent Organisation Details	Senior Director BNP Paribas Real Estate
Comment ID	543
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>THE CO UNCIL 'S PO L ICY LP34</u></p> <p>This policy seeks to deal with industrial land in the following way.</p> <p>Protecting Industrial Land and Premises</p> <p>A. The Council will support the use of land and premises for industry and distribution in appropriate locations, falling within the following uses:</p> <ol style="list-style-type: none"> 1 Light industry (falling within Use Class E (giii)); 2 General industry (B2); 3 Storage and logistics/distribution (B8); 4 Flexible hybrid industrial space; 5 Secondary materials, waste management and aggregates; 6 Utilities infrastructure; 7 Land for suitable transport functions, including intermodal freight interchanges, rail and bus infrastructure; 8. Research and development of industrial and related products or processes (falling within Use Class E (gii)); and 1 Sui generis uses that relate to, and are necessary to support, the operation of sites of an industrial nature. <p>Strategic Reservoir of Industrial Land</p>

	<p>B. A strategic reservoir of industrial land, comprised of the borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIAs), will be protected and retained. In these locations:</p> <ol style="list-style-type: none"> 1 Uses identified in Part A will be supported. Where necessary, proposals may be subject to the use of planning conditions or Section 106 planning obligations in order to protect the industrial function of the land. 1 The redevelopment of sites must provide at least the full replacement of existing industrial floorspace, in accordance with those uses identified in Part A. 1 The intensification of sites for industrial purposes through increased floorspace will be strongly encouraged. Landowners should, where appropriate, work with those of adjacent sites in order to make the most efficient use of land. 1 Development proposals for other uses in these locations will not be supported, except in the following circumstances and provided that the use does not erode the effective operation of the industrial function of the SIL or LSIA: <ol style="list-style-type: none"> a. In the Battersea Design and Technology Quarter, SME office accommodation and research and development uses will be appropriate on upper floors, if it would result in the intensification of industrial uses on the site. Such development must accord with the Area Strategy and relevant Site Allocation. If the existing use of the site is solely or predominantly for office use, redevelopment must provide for new industrial uses on the ground floor, unless this would result in harm to a heritage asset and/or would cause material harm to the amenity of neighbouring occupiers or the operations of neighbouring uses. b. In other locations, offices and other non-industrial uses will only be supported where they are ancillary to the use of the site or premises for one or more of the industrial uses identified in Part A. c. In limited instances, non-industrial uses may be appropriate in these locations if they are small-scale and cater for the local needs of people working in the are
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The draft allocation includes detailed elements which merit discussion.
Council Response	Comment noted. Please see response to comment #542 under Chapter 1.
Proposed Change	No changes considered necessary.
Consultee Full Name	Ridan Realty
Consultee Organisation Details	
Agent Full Name	Jeff Field
Agent Organisation Details	Senior Director BNP Paribas Real Estate
Comment ID	544
Title	Paragraph
Number	3.19

Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><u>EVIDENCE BASE</u></p> <p>The AECOM Wandsworth Employment Land and Premises Study (October 2020) is important for the following reasons:</p> <ul style="list-style-type: none"> - it identifies the Thornsett Road LSIA (Site C6) with having '<i>some potential</i>' for development - the assessment that they undertook was qualitative based, on supply characteristics and does not include any analysis of viability or deliverability <p>The Report describes the LSIA as follows (<i>4.62 and Table 4.12</i>):</p> <p><i>'The cluster is well-occupied and there is no evidence of vacancy. A new industrial headquarters facility was built around 5 years ago. Towards the west of the cluster there are some buildings which are older in character. These could be intensified to provide additional industrial floorspace.</i></p> <p><i>However, this cluster is close to residential properties and community uses and there is limited parking space. There is also evidence that the existing space is particularly well suited to certain tenants including car servicing businesses'.</i></p> <p>An important consideration here is that AECOM used 'vacancy' as a key criterion as to whether intensification could take place. Furthermore, it talks about parking as a deterrent, however the 2021 London Plan seeks to encourage occupied buildings for intensification (redevelopment) and seeks to support car-free development in areas of good accessibility.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The draft allocation includes detailed elements which merit discussion.
Council Response	Comment noted. Please see response to comment #542 under Chapter 1.
Proposed Change	No change considered necessary.
Consultee Full Name	The Arch Company

Consultee Organisation Details	The Arch Company
Agent Full Name	Alex Christopher
Agent Organisation Details	Director Turley Associates
Comment ID	546
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>THE WANDSWORTH 'PRE-PUBLICATION' DRAFT LOCAL PLAN (REGULATION 19, JANUARY 2022) – WRITTEN REPRESENTATIONS ON BEHALF OF THE ARCH COMPANY PROPERTIES LP</p> <p>We write on behalf of The Arch Company Properties LP (“The Arch Company”) with respect to the Public Consultation on the emerging Wandsworth ‘Publication Version’ Local Plan (Regulation 19, January 2022) [hereafter: “emerging Local Plan”] and specifically with regard to the Battersea Design and Technology Quarter (“BDTQ”) and Site Allocation NE8 (Silverthorne Road) forming part of the wider Area Strategy for Nine Elms.</p> <p>It is worth noting that our client acknowledges and welcomes that the submitted representations to the LB Wandsworth (Pre-Publication) Draft Local Plan (Regulation 18) in March 2021 had a positive influence on the Publication Version subject to this consultation (as set out in the Council’s Pre-Publication Consultation Statement, January 2022) and resulted in various updates to the detailed wording of the emerging policies and their supportive text.</p> <p>In order for Local Plans to be found sound, we note that in line with Paragraph 16 of the National Planning Policy Framework (“NPPF”, 2021) it is important that they are:</p> <p>Positively prepared: Provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities;</p> <p>Justified: Based on an appropriate strategy, taking into account the reasonable alternatives, and proportionate evidence;</p> <p>Effective: Be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters; and</p> <p>Consistent with national policy: To enable to delivery of sustainable development.</p> <p>This is particularly important at this stage of the plan-making process where the Council is seeking to prepare a robust plan for independent examination. These written representations have been prepared with the above requirements in mind, whilst also reflecting our client’s wider observations to ensure the plan is clear in its objectives and therefore effective in guiding future development.</p> <p>The Arch Company & LB Wandsworth Portfolio</p> <p>Although the Council may be aware, it is considered that it will be helpful to provide some background information on The Arch Company nationally and their portfolio within the borough. The Arch Company acquired Network Rail’s former commercial estate business in 2019. It is the landlord for more than 4,000 businesses across England and Wales, making it the UK’s largest small business landlord, working with thousands of business owners, from car mechanics to bakeries and restaurants, who make a unique and vital contribution to the UK economy.</p> <p>In regard to the potential implications of the emerging Local Plan it is of importance to identify that The Arch Company has substantial land holdings within the borough, specifically in the newly designated BDTQ Cluster, with a portfolio of sites available for delivery over the plan period. The key sites within this portfolio are located within Site Allocation NE8 (Silverthorne Road) and include the existing bus depot on Silverthorne Road and a parcel land known as 70a Silverthorne Road. The sites are designated within the adopted and emerging Local Plan as Strategic Industrial Land (“SIL”), better known as the Queenstown Road, Battersea SIL. In addition, our client is in control of a substantial number of railway arches within the borough (and their adjacent land) including in and around the above SIL and Portslade Road (including the CCF site), New Covent Garden Market and other parts of the Central Activities Zone (“CAZ”), along Pensbury Place adjacent to various (designated) Waste Management sites and the wider borough (see Annex 1 for an overview of The Arch Company’s landholdings in</p>

	<p>and around Nine Elms/Battersea and Annex 2 for a comprehensive overview across LB Wandsworth). It is worth noting, that The Arch Company has recently completed three and is at feasibility stage for a further 21 railway arch regeneration projects resulting in a significant investment in the local economy.</p> <p>Accordingly, and taking account of the scale of The Arch Company's portfolio (totalling approx. 1.3m sq. ft of business and employment space/land including, but not limited to, hundreds of railway arches), the potential implications of the emerging Local Plan are of significant importance. As such, our client has a strong interest in ensuring that the emerging Local Plan creates the strong, flexible and ambitious planning framework it seeks to provide in order to facilitate the sustainable growth the borough requires.</p> <p>Conclusion</p> <p>Overall, and subject to the recommendations and proposed modifications set out as part of this submission, The Arch Company continues to offer its support for the direction of the emerging Local Plan and relevant policies contained within it, particularly in relation to the BDTQ and Site Allocation NE8, and the future industrial- and logistics-led intensification of this strategic employment area.</p> <p>Our client is also supportive of the flexibility provided through the revised wording contained in Draft Policy LP36 in relation to new development in and/or the re-purposing of railway arches across LB Wandsworth which is particularly relevant to their land holdings, but – reflecting market conditions and occupier requirements, and to provide a robust, yet flexible policy framework – continues to seek minor adjustments to ensure the policy wording is as effective as possible in guiding future proposals. It is important to ensure that the borough's railway arches and their adjacent land continue to be a strongly supported reservoir for the provision of much-needed (flexible) economic, commercial and leisure uses within the borough.</p> <p>Our client and we are looking forward to continuing our positive and pro-active discussions with LB Wandsworth to assist the Council in preparing a sound and deliverable new Local Plan, and to bring forward new development across their portfolio over the coming years.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To ensure the LP is robust, yet flexible enough to deliver new development in line with market need/demand.
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	The Arch Company
Consultee Organisation Details	The Arch Company
Agent Full Name	Alex Christopher
Agent Organisation Details	Director Turley Associates
Comment ID	547
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	

Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Draft Policy PM3 (Nine Elms), Site Allocation NE8 (Silverthorne Road) & Draft Policy LP34 (Managing Land for Industry and Distribution)</p> <p>Chapter 5 of the emerging Local Plan continues to set out the Council's ambition and spatial approach for the wider Nine Elms area in general and the BDTQ (including the above site allocation) in particular. Overall, The Arch Company supports the Council's ambition for the area, as set out in Draft Policy PM3, which is expected to create a robust framework for new development which successfully contributes to the delivery of intensified industrial, business and employment floorspace.</p> <p>Depending on the delivery timescales on key site allocations in the BDTQ (and wider area), it is considered to be beneficial to ensure that <u>up-to-date evidence for the employment need and demand</u> is applied at the time when individual planning applications or masterplans are being prepared in order to influence the layout, land uses and form of development coming forward.</p> <p>It is therefore important to reiterate the importance of Part B(6) of Draft Policy PM3 in that proposals in the BDTQ need to a) protect and b) should not adversely impact industrial operations and businesses in the SIL. It is further recommended to ensure that <i>logistics</i> uses are similarly recognised as part of this policy and that it provides a robust basis for potential multi-storey (light) industrial and logistics uses to come forward (i.e. clarity that all SIL-compliant employment-generating uses may be located on upper floors) – of note, this is already recognised in Para. 5.70 of the plan for the Silverthorne Road site allocation and should be added to Policy PM3 for consistency. A similar request from the Greater London Authority ("GLA") contained in their representations to the Pre-Publication Version of the</p> <p>plan seeking a flexible policy wording to allow the potential of industrial/logistics uses on upper floors is acknowledged. However, any such redevelopment schemes will be influenced by site constraints, market demand and occupier requirements or may be delivered in phases. With regards to Part B(6c), it is therefore recommended to adjust the current wording as follows: <i>"Proposals within this location:</i></p> <p><i>[...] must deliver intensified industrial floorspace (where possible based on up-to-date market needs and demands) as part of any mixed-use scheme, including provision for industrial & logistics uses on the ground (and, depending on market demand, upper or mezzanine) floor(s)".</i></p> <p>The proposed amendments to Site Allocation NE8 are noted and generally supported, thereby creating a strong framework for future development in the area. Particularly the recognition that existing uses may be surplus to requirements in the future is acknowledged and should be retained as and when the plan gets adopted (see Para. 5.70).</p> <p>Whilst the overall ambition of the BDTQ to provide a mix of employment-generating uses including office and other workspace is recognised, it is important to reiterate that this and wider site allocations in the area are located within an active and protected SIL. As such, and thereby demonstrating compliance with Policies E4(A) and Policy E5(C) of the London Plan (2021), <u>land uses falling within an industrial-type activity should always be the priority in this (and other) SIL(s)</u> and only where an evidenced need has been addressed and the required industrial land supply (is deemed to be) met, should there be a focus on non-industrial uses. Providing such clarity in the above site allocation and being explicit about it in Draft Policy LP34 is strongly recommended to ensure that a sound Local Plan is prepared (which conforms with the requirements of the London Plan). Given the site allocation's overall footprint (and low density in terms of built environment), it has the potential to become a key asset for industrial/employment intensification which should be recognised by and fully reflected in the emerging Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To ensure the LP is robust, yet flexible enough to deliver new development in line with market need/demand.

Council Response	<p>Support noted. Planning applications or masterplan proposals would be expected to be assessed and prepared on the basis of up-to-date evidence, and it is not necessary to add this requirement within text of the Local Plan.</p> <p>Logistics uses are included within the definition of 'industrial uses', as set out within paragraph 18.24. While the Plan must be read as a whole, given both that this clarification sits in a different chapter and the importance of logistics uses, it is considered useful to add reference to logistics uses within PM3.B.6.a and c. The requirement in part c ("including provision for industrial uses on the ground floor) is that redevelopment must provide for this (see LP34.B.a), ensuring that industrial operations which require such access are best located within a scheme. It does not preclude the development of industrial uses on mezzanine or upper floors, which are encouraged (see LP34.B.3 and paragraph 18.28).</p> <p>The Council agree with comments made in the representations that industrial uses remain the focus for this area, and it is noted that the requirement set out within LP34.4.a (relating to the BDTQ) is that "SME office accommodation and research and development uses will be appropriate on upper floors, if it would result in the intensification of industrial uses on the site". The comma in this sentence should be removed as it is unnecessary. Any mixed-use development which incorporates economic uses (or on economic land) must also have regard to LP37.C, which, among other requirements, sets out that development proposals must adhere to the agent of change principle as set out in London Plan Policy D13.</p>
Proposed Change	<p>Amend PM3.B.6.a as follows:</p> <p>"must not adversely impact industrial <u>and logistics</u> operations and businesses within the Queenstown Road Battersea SIL; and"</p> <p>Amend PM3.B.6.c as follows:</p> <p>"must deliver intensified industrial <u>and/or logistics</u> floorspace as part of any mixed-use scheme, including provision for industrial <u>and/or logistics</u> uses on the ground floor; and"</p> <p>Amend LP34.B.4.a as follows:</p> <p>"In the Battersea Design and Technology Quarter, SME office accommodation and research and development uses will be appropriate on upper floors; if it would result in the intensification of industrial uses on the site."</p>

Consultee Full Name	The Arch Company
Consultee Organisation Details	The Arch Company
Agent Full Name	Alex Christopher
Agent Organisation Details	Director Turley Associates
Comment ID	548
Title	LP36 Railway Arches
Number	Policy 47
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><i>Draft Policy LP36 (Railway Arches)</i></p> <p>It has been positively received that the majority of our recommended changes to Draft Policy LP36 have been reflected in the Publication Version of the Local Plan, such as the introduction of further flexibility to the variety of acceptable land uses in railway arches (LP36.1) or the suggested clarification on the marketing procedure for vacant railway arches (Appendix 1).</p> <p>As drafted, the emerging policy wording is generally supported by The Arch Company, subject to a number of minor modifications recommended below to ensure the policy is as effective and clear as possible and fully reflects our client's experience and expertise as landlord of the vast majority of railway arches in the borough.</p> <p>It is noted that Draft Policy LP36 (i.e. Parts 1.; 4.; 5.) as well as other policies within the emerging Local Plan refer to 'Community Uses'. Unlike 'Economic Uses', the term 'Community Uses' is not defined in the Glossary of the document. For the avoidance of doubt or misinterpretation, it is therefore recommended to provide a definition for 'Community Uses' as part of the emerging Local Plan. This could include reference to suitable community or social infrastructure uses falling within <i>Use Classes E(d), F1, F2 and/or any sui generis community uses</i> (whilst noting that in specific circumstances other uses may similarly serve a purpose to the local community/social infrastructure).</p> <p>With regards to Part 6, our client is in agreement that railway arches can play a key role in providing public access and improving connectivity. However, it is important for the policy to reflect that new public access through railway arches should be masterplan-led and factors in that any (current or potential) employment-generating floorspace in such arches should not be lost, i.e. that the implications are fully considered.</p> <p>In relation to Part B, it is noted that the policy wording has been amended to relate to 'open and/or vacant' railway arches only which is deemed to be a logical amendment to the previous version. However, it is worth noting that demonstrating that the existing biodiversity value of a railway arch is unharmed should realistically only be relevant</p>

	<p>to open and vacant railway arches. Vacant, but 'enclosed' or 'built out' railway arches are not expected to have any biodiversity value as would be the case with any wider enclosed commercial buildings (i.e. there should be a consistent approach to wider development). Similarly, our client wishes to clarify that railway arches are often only vacant for a limited period of time in-between a change of use or change in occupiers which should not have any implications on their biodiversity value – it is recognised and supported that where open railway arches are vacant for an extended period of time (i.e. 24-36 months or longer), it should be ensured that any biodiversity value in such arches remains unharmed. As such, and to ensure Local Plan Policy LP36(B) is sound, clear and provides a reasonable policy framework, it is recommend to amend the draft wording as follows:</p> <p><i>"Where a proposal involves the use of open and/or <u>long-term</u> (<u>[24 or] 36 months or longer</u>) vacant railway arches, evidence will need to be submitted which demonstrates that any existing biodiversity value will not be harmed by the use or that appropriate mitigation measure will be provided in line with Policy LP 57 (Biodiversity)."</i></p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To ensure the LP is robust, yet flexible enough to deliver new development in line with market need/demand.
Council Response	<p>General support for the previous amendments relating to Policy LP38 is noted.</p> <p>It is agreed that the operation of this policy could be improved if a definition of community uses was included within the Glossary. This should be added under 'Social and community infrastructure/uses' to ensure that it is applicable to other policies within the Local Plan too (e.g. LP</p> <p>It is stated in the supporting text (paragraph 18.59) that "Where proposals seek to introduce new connections, these should be derived from a larger vision for the site, for example as established within a masterplan or design framework".</p> <p>The policy sets out clear protection for economic (and other) uses of railway arches in particular locations. It is possible, however, that opening up an arch may result in the loss of an existing use, but result in wider benefits. As such, the policy should be read as a whole and it should be assessed on a case-by-case basis through the development management process whether such proposals would be appropriate.</p> <p>It is agreed that the policy as worded could result in the assessment of biodiversity value and mitigation of harm to it being required for short-term vacancies (a function of a normally operating market) and for enclosed arches, which is not its intention. The policy should be amended to correct this.</p>
Proposed Change	<p>Add a new definition to the Glossary as follows:</p> <p>"Social and community infrastructure / uses - any use that is important to the local community. These encompass a wide range of services, some of which are statutory, such as health and education, and the Council will work with partners to ensure that local communities continue to have access to these. Others are non-statutory community services, such as cultural, play, recreation, sports and faith facilities, including those for voluntary or charitable purposes. Examples of social and community infrastructure or uses include public services, GP surgeries, nurseries, community centres, public halls, arts and cultural facilities, policing, fire and ambulance services, youth centres, social clubs, indoor sports and recreation facilities, libraries, laundrettes, places of worship, and public houses. This is not an exhaustive list and the Council will determine whether any facility or service is considered to be a social infrastructure or community use."</p> <p>Amend LP36.B as follows:</p> <p>"Where a proposal involves the use of open and/or <u>long-term</u> (<u>24 months of longer</u>) vacant railway arches, evidence will need to be submitted..."</p>

Consultee Full Name	The Arch Company
Consultee Organisation Details	The Arch Company
Agent Full Name	Alex Christopher
Agent Organisation Details	Director Turley Associates
Comment ID	549
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	Yes
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<i>Draft Policy LP38 Affordable, Flexible and Managed Workspace</i> Our client welcomes the amendments made to Draft Policy LP38 insofar as they relate to the inclusion of 'subject to scheme viability' to both Parts A and B of the policy wording, as well as the additions and changes made to the definition of 'affordable workspace' in the Glossary . Those changes are deemed essential to ensure the emerging policy is deemed sound (and justified).
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To ensure the LP is robust, yet flexible enough to deliver new development in line with market need/demand.
Council Response	Support noted.
Proposed Change	No changes required.
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins

Agent Organisation Details	Senior Planner Turley
Comment ID	550
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>REPRESENTATIONS TO WANDSWORTH LOCAL PLAN (PUBLICATION VERSION REGULATION 19 CONSULTATION)</p> <p>We write on behalf of our client, VSM (NCGM) Ltd (hereafter referred to as “VSM”), to make representations to London Borough of Wandsworth’s (LBW) draft of the Wandsworth Local Plan (hereafter referred to as the “Local Plan”), which is a “publication” version of the Local Plan and is at the Regulation 19 stage in the development plan preparation process, pursuant to the Town and Country Planning (Local Planning) (England) Regulations 2012. The Local Plan is out for consultation from 10 January 2022 to 28 February 2022.</p> <p>These representations focus on whether the Local Plan, as progressing, could meet the National Planning Policy Framework’s (NPPF) (2019) four tests of soundness from paragraph 36, when submitted for examination at Regulation 19 stage in the development plan preparation process. For avoidance of doubt, the four tests are:</p> <ul style="list-style-type: none"> • 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. • Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in the NPPF. <p>In assessing the potential for the Local Plan to be sound, we have regard to land at New Covent Garden Market (NCGM). VSM benefits from a hybrid planning permission (ref. 2014/2810, granted 12 February 2015) for the redevelopment of NCGM for the consolidation and re-provision of a new wholesale market and the delivery of a high-density mixed use development, including up to 3,019 dwellings and retail, office, leisure and community floorspace. The NCGM development is to be delivered across five distinct Development Zones: the Main Market Site, the Apex Site, the Thessaly Road Site, the Northern Site, and the Entrance Site (see the plan at Appendix 1). Further details of this permission, and how it relates to the Local Plan, are given in the content of this letter.</p>

In addition to the NPPF tests of soundness, the Local Plan will be examined on the basis of fulfilling the duty-to-co-operate and meeting the legal requirements from the Section 19 Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. We do not wish to make comments on these matters at this stage; except the legal requirement for the Local Plan to be in general conformity to the London Plan. Our views on the Local Plan's conformity with the London Plan (2021) are expressed throughout these representations.

The representations are set out in the following subheadings of this letter. For simplicity, each sub-heading reflects each chapter of the Local Plan and contained within it is a table which assesses the relevant policies of each chapter in terms of the legal requirement for general conformity with the London Plan and the NPPF tests of soundness. The table also contains a column for suggested amendments. We have not listed the wording of the proposed polices to avoid repetition (as they are listed in full in the Local Plan).

Not all policies are commented on at this stage, and the absence of a comment should not be taken as support for that policy. VSM reserves the right to make further comments at the next consultation stage of the Local Plan.

CONCLUSIONS

VSM considers that at this stage, various policies of the Local Plan are not consistent with the London Plan and do not meet the NPPF's tests of soundness. Amending those policies in line with the aforementioned suggestions would help make the Local Plan legally compliant and sound.

We trust that you will consider our comments and respond accordingly. We would like to highlight that this is an interim representation and that VSM reserves the right to submit further representations in due course as the review of the Local Plan progresses.

In the meantime we welcome the opportunity to discuss the comments with you further should you find this of assistance. If you have any queries, please do not hesitate to contact Freya Turtle or Alice Hawkins at our London office.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd

Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	551
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy SDS1 Spatial Development Strategy 2023-2038 London Plan conformity</p> <p>Policy SDS1 seeks to direct new development homes to the Nine Elms area as defined by the Area Strategy (amongst other areas) as the first priority within the sequential approach. It aims to deliver the total capacity for new homes (8,417 within the Nine Elms area) by permitting development within the defined Area Strategy boundaries and associated Site Allocations where they comply with all other relevant policies of the Local Plan. It also aims to make the best use of land whilst ensuring that development densities are appropriate to the location and size of the site. Policy SDS1 Point E also seeks to provide for employment needs by supporting the development of a net increase in new office space within the emerging centres including at Battersea Power Station and Nine Elms.</p> <p>We consider this strategy to be in accordance with London Plan Policy SD1, which seeks growth at Opportunity Areas, of which Nine Elms is an Opportunity Area, and London Plan Policy D3 which seeks optimisation of site capacity through a design-led approach.</p> <p>NPPF: positively prepared No comment. NPPF: justified We agree that directing development to the Nine Elms Opportunity Area is an appropriate strategy. NPPF: effective</p>

	<p>No comment.</p> <p>NPPF: consistent with national policy</p> <p>Policy SDS1 is consistent with the impetus of the NPPF in so far as it seeks growth in sustainable location (i.e. Opportunity Areas).</p> <p>Suggested amendments to policy</p> <p>No comment.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	Support noted.
Proposed Change	No changes considered necessary.

Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	552
Title	PM1 Area Strategy and Site Allocations Compliance
Number	Policy 2
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy PM1 Area Strategy and Site Allocations Compliance London Plan conformity No comment. NPPF: positively prepared No comment. NPPF: justified No comment. NPPF: effective</p> <p>Policy PM1 allows for development not consistent with the Site Allocations to be approved where clearly evidenced that an alternative form of development can be justified. We would suggest that in addition, reference is also made to changes to London Plan and national policy as being circumstances in which development can deviate from Site Allocations. This flexible approach would ensure that the Local Plan can be deliverable in terms of meeting overarching growth objectives.</p> <p>NPPF: consistent with national policy No comment. Suggested amendments to policy Reference to be made to changes to London Plan and national policy, as being circumstances in which development can deviate from Site Allocations.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	Comment noted. To provide greater certainty, part B of Policy PM1 is proposed to be deleted as this is considered to repeat section 38(6) of the Planning and Compulsory Purchase Act 2004.
Proposed Change	Amend Policy PM1 criteria B as follows: B. Proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy, or Site Allocations on neighbouring sites.
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	553
Title	PM3 Nine Elms
Number	Policy 4
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy PM3 Nine Elms London Plan conformity Policy PM3 seeks to deliver at least 8,414 homes in the Nine Elms area and will contribute to realising the overall housing capacity of the VNEB of 18,500 homes. VSM supports this inclusion of the contribution to the overall housing capacity of the VNEB as set out under London Plan Policy SD1.

VSM agrees with Policy PM3's support for meanwhile uses on development sites, as this is in compliance with London Plan Policy D8.

Policy PM3 requires development to make provision to connect to District Heat Networks and where these existing networks rely on CHP they should be

decarbonised by 2050. VSM recognises this as being in compliance with London Plan Policy SI3 and its supporting paragraph 9.3.3.

NPPF: positively prepared

No comment.

NPPF: justified

VSM supports the promotion of the growth of three creative quarters, focussed on cultural activities that have an established legacy and relevance to local communities, including the Food and Horticultural Quarter focused around the New Covent Garden Market area. This is considered an appropriate strategy in line with the Cultural Strategy for Battersea and Nine Elms.

NPPF: effective

The policy states that "*development proposals for tall or mid-rise buildings in Nine Elms will only be supported in zones identified in Appendix 2*". This wording is considered to be overly stringent and inflexible for a policy that is to be in place for the next 15 years. Furthermore, it stymies sites to be developed to their full development potential, which does not accord with paragraph 125 of the NPPF, which states that "*plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport*". Appendix 2 identifies wide areas as not being appropriate for tall or mid-rise buildings, despite being in accessible locations. It is also noted at NPPF Paragraph 130 point c) that planning policies should ensure that developments

"are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)"[our emphasis].

It is recommended that the wording of the proposed policy is allowed greater flexibility by including the wording "*unless otherwise robustly justified and demonstrated that it will not prejudice the delivery of the Local Plan's Vision and Objectives or Site Allocations on neighbouring sites.*"

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Part 4 of the policy states that "*consented development schemes should take place in accordance with their respective existing approved Design Codes. New or amended development proposals will be expected to meet the Vision for Nine Elms and to protect and enhance important views and vistas in the area*". Whilst the acknowledgement of extant permissions and their own Design Codes and masterplans is supported, and it is accepted that any new development proposals in the area should accord with the Local Plan's Vision for Nine Elms, it is not considered appropriate to require amendments to extant permissions to accord with the Local Plan's Vision for Nine Elms and not with extant Design Codes, which is what the wording implies. Some of the approved developments, such as the

New Covent Garden Market planning permission, span numerous development sites, blocks and buildings. Should amendments be made to one or a selection of blocks, it is not appropriate for the Local Plan's Vision to become the overriding consideration for that amendment as it will still be important for the amended block(s) to accord and align with the wider approved/deliver blocks in the same permission. It is recommended that the wording is changed to "*consented development schemes should take place in accordance with their respective existing approved Design Codes. Where such schemes are amended, further consideration should be given to the Vision for Nine Elms as well as the approved Design Codes. New development proposals will be expected to meet the Vision for Nine Elms and to protect and enhance important views and vistas in the area*".

	<p>NPPF: consistent with national policy</p> <p>No comment.</p> <p>Suggested amendments to policy</p> <p>Part 3 of the policy should be amended to allow instances for tall or mid-rise buildings to be approved outside zones identified in Appendix 2 where it is robustly justified and does not prejudice the delivery of the Local Plan's Vision or neighbouring site allocations.</p> <p>Part 4 of the policy should be amended to recognise that where extant permissions are amended, consideration will need to be given to both the approved Design Code and the Local Plan's Vision.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	<p>Comment noted. The approach to meeting the borough's housing needs has been considered in the Council's Housing and Economic Land Availability Assessment (HELAA), which forms part of the evidence base underpinning the Local Plan. The tall and mid-rise buildings policy approach, informed by the Urban Design Study (and the design-led approach it employs) has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery in accordance with a design -led optimisation approach. Design-led optimisation means ensuring that development is of the most appropriate form and land use for the site that responds to a site's context and capacity for growth. The sites context has been reviewed in the UDS, that has informed the HELAA, and the heights and zoning shows the Council's preferred approach as a result.</p> <p>The evolving context of the Nine Elms Opportunity area has been taken into account within the UDS. In relation to this site page 184 of the UDS describes the context of TB-B3a-03, stating that there is capacity for tall buildings across this zone stepping down from the adjacent very tall towers within LB Lambeth. The assessment of this zone concludes that 7-10 storeys is an appropriate height in this context – which is not as mentioned a blanket 7 storeys. The approach to what constitutes tall is in conformity with policy D9 of the London Plan and is purposefully nuanced within the context of the character of the current and evolving land use nature of the OA. MB-B3a-02 zone is considered to fall outside of the areas of the Opportunity Area more appropriate for taller building s- i.e. TB, B3-01, TB-B3a-01, and the adjacent TB zones of TB-B3a-02 and TB-B3a-03. MB-B3a-02 is surrounded to the south by low rise residential buildings and is considered that the context of this area is predominantly lower rise.</p> <p>Figures 212, 213 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity, probability of change / development capacity at a level of detail expected from a map of the borough. This is clarified in section 4.2 of the UDS: 'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality. There may be smaller scale highly sensitive areas (including for example locally listed parks and gardens) which are not illustrated in the borough-wide map but would be sensitive to change. These are generally noted in the valued features descriptions in the character area profiles.' And in 4.3 (probability of change): 'This is not to suggest that all sites within this areas are acceptable for development; rather, that as a whole the likelihood of change is higher.'</p> <p>The approach to building height in this area is considered sound. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'Transform' area as per the characterisation assessment of the UDS. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No change considered necessary.

Entrance Site- NE12a

The proposed allocation for the Entrance Site (allocation reference NE12a) is considered to be in general accordance with permission ref. 2014/2810 in regard to land uses, mix, and relationship with surrounding sites. VSM supports LBW's decision not to state or fix residential unit numbers or floorspace, or building heights, for the Entrance Site Allocation. It is suggested that the same approach is taken for the suggested Site Allocation for the Apex Site and Thessaly Road Site, in order to allow for flexibility and to respond to changing circumstances.

Thessaly Road- NE12b

The proposed allocation for the Thessaly Road Site (site allocation NE12b) is generally supported in terms of allocation for residential use and with a scale and massing that is sympathetic to the existing context. However, the context section notes *“The development should complete the east side of Thessaly Road in a harmonious manner and reflect the scale, width and proportion of the street”*.

It also notes in relation to building heights for the site that *“the maximum appropriate height for the zone is 6 storeys. The height of developments within that zone should not exceed the heights of, and be in accordance with, the mid-rise building map in Appendix 2”*.

It is acknowledged that this approach aligns with the approved application ref. 2014/2810 from 2015. However, VSM suggests that a limited description of the context and a prescriptive maximum building height do not take into account the changing context of the site and its surroundings. The context does not take into consideration wider context beyond the western side of the street. However, since the granting of permission 2014/2810, there are examples of a changing built context and townscape which would be perceived from the public realm in relation to Thessaly Road. For example, the Sleaford Industrial Estate and Dairy Crest Milk Distribution Depot lies to the north of the site on the opposite side of the railway lines at the northern end of Thessaly Road and forms Phase 4a of the Battersea Power Stations redevelopment. Application 2015/3555 was approved in December 2015. This allowed redevelopment of the site for seven new blocks containing 374 residential units, a health centre, business and flexible retail and commercial floorspace. These blocks predominantly range from 9 to 18 storeys, with the blocks stepping down towards Thessaly Road yet maintaining nine storeys. Another example is at the Lambeth College Vauxhall Centre site, where LB Lambeth Council approved outline planning permission (19/02643/OUT) in February 2021 for a part, 2, 4, 6, 7 10 and 20 storey series of blocks. It is considered that both of these permissions represent an example of changing context surrounding the Thessaly Road Site Allocation. VSM suggests that a set maximum building height for the site is not appropriate and should be revised to provide a flexible range, as per the Entrance site, in order to allow for changing circumstances and context. Similarly, the context for the site does not consider wider context beyond the built form of the western side of Thessaly Road, which has changed since the granting of application ref. 2014/2810. It is considered that this site allocation's description of context is revised to include reference to the wider context to the north, and the building heights section is revised to provide either an acceptable height range of *“6-8 storeys”* or to reference that increased heights can be permitted subject to robust justification and demonstrable public benefit.

Apex Site

The proposed allocation for the Apex Site (allocation reference NE12c) reads:

“Residential and commercial uses (comprising retail, restaurant, business and leisure uses) with the creation of a new east-west pedestrian / cycle route connecting Pascal Street to the railway viaduct and the wider Nine Elms area to the north of the railway, and reuse of the railway arches immediately adjacent to the site for commercial uses.” This is supported by VSM as in accordance with permission ref. 2014/2810. The commentary on the relationship with the Main Market Site is also generally supported, although it is noted that the lower levels of the development should not solely be food-related, and suggest the revised wording to read *“provision for food related uses, alongside other uses where appropriate, on the lower levels of the development”*.

The commentary in relation to public realm notes that there should be “a sequence of high-quality public spaces should be provided including a central square framing the Garden heart building”. It is noted that the approved application 2014/2810 provides a ‘Garden Square’ which forms the public face of the market and frames the linear approach to the Garden Heart running from north to south along the Apex site. As such, this is considered in accordance with this consent.

The building heights section of the site allocation notes that the maximum height for tall buildings on the site (in accordance with the tall buildings map at Appendix 2) is 7 to 10 storeys and the maximum height for the mid-rise buildings is 6 storeys. VSM do not consider this approach to be justified or at all appropriate given the scale and massing approved for the site under planning consent 2014/2810 which provides consent for tall buildings on plots A1,A2, A3 and A4 of maximum heights of between 54m and 86m AOD. These buildings are all classed as being of a tower typology in the approved Design Code of G+>15 storeys. Reserved matters have recently been submitted for proposals on Building A1, within these highest parameters of 86m AOD, for a 26 storey tower. Similarly buildings A5 and A6 and have consent for heights of 12m and 17m AOD and a Design Code typology of G+ <11 Storeys. The approved height strategy under permission 2014/2810 was the subject of robust and thorough heritage and townscape analysis that demonstrated its acceptability. As such, it is proposed that this is revised to reflect the extant permission on the site to allow for tall buildings between 16 and 26 storeys. It is also suggested, that to allow for potential changing context, it is noted that proposals for taller buildings may be accepted if justified in accordance with LBW’s Tall Buildings Policy

NPPF: effective
No comment

NPPF: consistent with national policy

NPPF Paragraph 130 point c) notes that planning policies should ensure that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)”.

As demonstrated above, it is considered that already there is a demonstrable changing built environment context around site allocations NE12a (Entrance Site), NE12b (Thessaly Road) and NE12c (Apex Site). As such, the height restrictions on these sites are not considered to be sympathetic to the future emerging local character of the sites and would discourage appropriate change and increased densities. As such, it is suggested that the above recommendations for change are made as cited above in order to ensure that the policy is consistent with national policy.

Suggested amendments to policy

Building heights and context to be revised on site allocation NE12a, Entrance Site, NE12b, Thessaly Road and building heights to be revised on site allocation NE12c, Apex Site to take account of extant permission and potential changing context; update to Apex Site allocation (NE12c) to make clear that other uses alongside food-related provision may be provided at lower levels.

Change(s) considered necessary

Wishes to attend Hearing Session

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

Reason why

VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.

Council Response

Comment noted. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.

Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.

Figures 212, 213 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity, probability of change / development capacity at a level of detail expected from a map of the borough. This is clarified in section 4.2 of the UDS: 'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality. There may be smaller scale highly sensitive areas (including for example locally listed parks and gardens) which are not illustrated in the borough-wide map but would be sensitive to change. These are generally noted in the valued features descriptions in the character area profiles.' And in 4.3 (probability of change): 'This is not to suggest that all sites within this areas are acceptable for development; rather, that as a whole the likelihood of change is higher.'

The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.

The UDS sets out the character of the borough which has been divided into seven 'places' and 25 character areas. Each 'place' is introduced, followed by the character area profiles for the character areas within it. The profiles begin with the key characteristics of the character area, followed by valued features and negative qualities. These aspects aim to capture the key aspects of character at a high level. This analysis, coupled with the sensitivity and change analysis, development capacity assessment and consideration of existing and consented tall buildings mapping has informed the identification of the tall and mid-rise building zones and appropriate height range. The conclusions of this work has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery. In all cases, the acceptability of individual plots will depend on specific characteristics of the site.

Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	555
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15

Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP4 Tall Buildings London Plan conformity</p> <p>Policy LP4 notes that proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2. Policy LP4 defines a tall building as one that is seven storeys or more; or 21m from the ground level, whichever is higher. This is a change from the previous Regulation 18 “pre-publication” version of the Local Plan which considered that buildings as low as five storeys could be considered tall in their context. This revision is considered to be in accordance with London Plan Policy D9 which states that the minimum height for a tall building must be at least six storeys.</p> <p>However, the supporting text to London Plan Policy D9 (paragraph 3.9.3) states that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. The blanket approach to any building above seven storeys being a tall building regardless of context is not consistent with the London Plan.</p> <p>In particular, Appendix 2 notes that both the Apex Site and Entrance Site of NCGM fall within ‘Tall Building Areas’ on Map 14.1. The Apex Site falls within sub-area code B3a-03 where appropriate tall buildings at 7-10 storeys. It is also noted that Thessaly Road falls under MB-B3a-02 where 6 storeys is highlighted as appropriate. This also has no regard to the emerging context of this Opportunity Area and the fact that there are buildings permitted / under construction for heights of 20, 30, 40 and 50 plus storeys. To suggest a six, seven or ten storey building is tall in this context is fundamentally flawed, especially as the Nine Elms area is identified in the relevant evidence based document (Arup Urban Design Study December 2021) (p8-10) as having a low sensitivity to change and high capacity for development and transformation, as set out in relation to the site allocations.</p> <p>Under the permission 2014/2810, the Apex Site allows for three buildings above 20 storeys and another building at 16 storeys – the principle of a tall building cluster</p> <p>8</p> <p>has already been accepted for this location and this context must be</p>

acknowledged. As such, it is considered that it should be classed as B3 (same as the Entrance Site) not B3a.

For the Thessaly Road site, it is also acknowledged, as set out in relation to the site allocations in N12 above, that the context of the Opportunity Area has changed since the consent under 2014/2810. As such, to allow for changing and evolving context within the Opportunity Area, in line with the London Plan, it is considered that the site should have "*opportunities for tall buildings if justified within a local context*" and subject to justification in the context of the design considerations of Policy LP4 and London Plan Policy D9 Parts C and D.

The policy states that "*development proposals for tall or mid-rise buildings in Nine Elms will only be supported in zones identified in Appendix 2*". This strict position is considered to not be in accordance with paragraph 125 of the National Planning Policy Framework, which states that "*plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate*". Appendix 2 identifies wide areas as not being appropriate for tall or mid-rise buildings, despite being in accessible locations.

NPPF: positively prepared

The ability to meet the housing needs for the Nine Elms Opportunity Area might be severely compromised by the current proposed tall building heights set out in Appendix 2, and the definition of tall buildings within policy LP4.

NPPF: justified

No comment.

NPPF: effective

No comment.

NPPF: consistent with national policy

The strict position that mid-rise and tall buildings can only be appropriate for the next 15 years under the strict allocations of Appendix 2 to not be in accordance with paragraph 125 of the National Planning Policy Framework, which states that "*plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate*".

It is recommended that the wording of the proposed policy is allowed greater

flexibility by including the wording "*unless otherwise robustly justified and*

demonstrated that it will not prejudice the delivery of the Local Plan's Vision and

Objectives or Site Allocations on neighbouring sites."

Suggested amendments to policy

The definition of a tall building should note that in other locations, particularly the Nine Elms Opportunity Area, the definition must take account of the emerging context (which includes buildings above 50 storeys) and not consider any building

above seven storeys and above as tall, regardless of context. In particular in the

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context of the existing planning permission, the Apex Site should be classed as area B3 and allow for buildings between 16-26 storeys, and the Thessaly Road site should be noted as having opportunities for buildings above six storeys if robustly justified within a local context.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The evolving context of the Nine Elms Opportunity area has been taken into account within the UDS. In relation to this site page 184 of the UDS describes the context of TB-B3a-03, stating that there is capacity for tall buildings across this zone stepping down from the adjacent very tall towers within LB Lambeth. The assessment of this zone concludes that 7-10 storeys is an appropriate height in this context – which is not as mentioned a blanket 7 storeys. The approach to what constitutes tall is in conformity with policy D9 of the London Plan and is purposefully nuanced within the context of the character of the current and evolving land use nature of the OA. MB-B3a-02 zone is considered to fall outside of the areas of the Opportunity Area more appropriate for taller building s- i.e. TB, B3-01, TB-B3a-01, and the adjacent TB zones of TB-B3a-02 and TB-B3a-03. MB-B3a-02 is surrounded to the south by low rise residential buildings and is considered that the context of this area is predominantly lower rise.</p> <p>Figures 212, 213 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity, probability of change / development capacity at a level of detail expected from a map of the borough. This is clarified in section 4.2 of the UDS: 'It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality. There may be smaller scale highly sensitive areas (including for example locally listed parks and gardens) which are not illustrated in the borough-wide map but would be sensitive to change. These are generally noted in the valued features descriptions in the character area profiles.' And in 4.3 (probability of change): 'This is not to suggest that all sites within this areas are acceptable for development; rather, that as a whole the likelihood of change is higher.'</p> <p>The approach to meeting the borough's housing needs has been considered in the Council's Housing and Economic Land Availability Assessment (HELAA), which forms part of the evidence base underpinning the Local Plan. The tall and mid-rise buildings policy approach, informed by the Urban Design Study (and the design-led approach it employs) has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	556
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy</p> <p>Policy LP10 Responding to the Climate Crisis</p> <p>London Plan conformity</p> <p>The requirement for BREEAM Outstanding on all non-residential buildings above 100 sqm is significantly more onerous than London Plan policy where there is no longer any requirement for BREEAM.</p> <p>The requirement for reducing carbon emissions by at least 35% on site with 10%/15% from energy efficiency alone is consistent with the new London Plan Policy SI2. The potential requirement for post-construction monitoring of renewable and low carbon installations is consistent with Policy SI2 of the new London Plan.</p> <p>The requirement for an overheating assessment is consistent with London Plan Policy SI4.</p> <p>NPPF: positively prepared</p> <p>No comment.</p> <p>NPPF: justified</p> <p>No comment</p> <p>NPPF: effective</p> <p>No comment.</p> <p>NPPF: consistent with national policy</p> <p>No comment.</p> <p>Suggested amendments to policy</p>

	Remove requirement for BREEAM 'Outstanding' and put emphasis on holistic sustainable design including reducing water use, reducing embodied carbon and health and wellbeing rather than BREEAM certification.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	LP10 B.1 includes adequate flexibility and states that for new non-residential buildings over 100 sqm they will be required to meet BREEAM 'Outstanding' standard, unless it can be demonstrated that this would not be technically feasible. This is considered to be reasonable requirement where applicants will already have to be demonstrating how they are reducing carbon emissions, gaining BREEAM outstanding should be achievable.
Proposed Change	No change considered necessary
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	557
Title	LP11 Energy Infrastructure
Number	Policy 22
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	London Plan conformity Policy LP11 seeks to ensure that new developments, in areas without any existing or planned Decentralised Energy Networks, should incorporate on-site decentralised energy networks. Whilst this somewhat reflects the energy hierarchy set out in the London Plan , it is considered that this should be updated to include all options under this hierarchy. NPPF: justified

	<p>Policy LP11 should also make consideration for alternative energy strategies/technologies that do not connect to an existing decentralised energy network, particularly if it can be demonstrated that it would be more efficient, clean and decarbonised than the decentralised energy network. Energy infrastructure technologies are rapidly evolving and the DHN's that have been installed in the last five years are already dated – policy should try and look to the future for accepting potential new approaches.</p> <p>NPPF: effective No comment.</p> <p>NPPF: consistent with national policy No comment.</p> <p>Suggested amendments to policy Make reference to London Plan energy hierarchy; and allow for alternative strategies that can be demonstrated as being more efficient, clean and decarbonised than the decentralised energy network.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	Comment noted. Upon further assessment the Council considers that a modification to the Local Plan would be appropriate. It is considered to ensure consistency with the London Plan that wording is added to LP11.A that where there are more efficient cleaner strategies available, and they are in accordance with the London Plan SI2 Energy Hierarchy these can alternatives can be considered.
Proposed Change	<p>Amend wording in policy LP 11 as follows:</p> <p><i>'New development will be expected to connect to any existing decentralised energy network (DEN); or any alternative strategies that can be demonstrated as being more efficient, clean and decarbonised than the DEN in accordance with the London Plan Energy Hierarchy.</i></p> <p>Where networks do not exist, developments should make provision to connect to any future network that may be developed, having regard to the possibility for this to come forward.</p>
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	558
Title	LP20 New Open Space
Number	Policy 31

Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy Policy LP20 New Open Space London Plan conformity No comment. NPPF: positively prepared No comment. NPPF: justified No comment. NPPF: effective No comment. NPPF: consistent with national policy</p> <p>Policy LP20 states that all major developments are required to provide a financial contribution to open space, if on-site open space cannot be provided. VSM does not consider this to be consistent with the NPPF paragraph 56, which states that planning obligations must only be sought where they meet the tests from Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.</p> <p>It might be the case that the open space requirements of new development can be accommodated by existing open space, such that the payment of a financial contribution would not meet the policy/legal tests. Policy LP20 should be amended to remove the blanket requirement for all major development needing to pay a financial contribution and instead regard should be had to the tests and the need for open space. Suggested amendments to policy Policy LP20 should be amended to remove the blanket requirement for all major development needing to pay a financial contribution and instead regard should be had to the tests and the need for open space.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	Comment noted. If the Council agreed that a site were able to accommodate its open space requirement on an existing site there would be no open space requirement then no contribution would have to be made. The wording of LP20 A. makes this clear.

Proposed Change	No change considered necessary.
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	559
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP23 Affordable Housing London Plan conformity</p> <p>Policy LP23 seeks to maximise delivery of affordable housing to contribute towards the Mayor's strategic target of 50% of all new homes to be affordable. The policy specifies that development sites must provide affordable housing on-site in accordance with the threshold approach set out in London Plan Policy H5 which</p> <p>requires 35% minimum on site provision (50% on public land) and a policy compliant tenure mix (according to London Plan Policy H6) to follow the Fast Track Approach.</p> <p>The policy also seeks for a tenure split of 50% low-cost rent, 25% first homes and 25% intermediate products. This is not considered to be in accordance with London Plan Policy H6 which notes that a minimum of 30% of homes should be provided as intermediate products. It is noted that the London Plan minimum tenure split requirements (30% low cost rent, 30% intermediate and the remaining 40% to be determined by the local authority) are required in order for schemes to follow the Fast Track approach as set out in London Plan Policy H5. Therefore, Policy LP23 currently does not allow for proposals to follow the threshold</p>

approach set out in London Plan Policy H5 by the fact that the required tenure mix does not comply with London Plan Policy H6. Therefore, the draft Policy LP23 is not considered to allow for both the Fast Track Route as set out in the London Plan, and compliance with LP23.

No comment.

NPPF: positively prepared

NPPF: justified

The Council's evidence base has recently been updated with a *Wandsworth Reg 19*

Local Plan Viability Study dated January 2022 which provides a high-level viability

assessment review of the cumulative impact of the 'Wandsworth Regulation 18

Pre-publication Draft Local Plan'. This notes that this viability testing was based on high level Residual Land Values (RLVs) for different site typologies and scheme types. However, at paragraph 1.10 it states "*the inputs to the calculation are hard to determine for a specific site (as demonstrated by the complexity of many section 106 negotiations). The difficulties grow when making calculations that represent a typical or average site. Therefore, our viability assessments in this report are necessarily broad approximations based on a typology of sites that may only slightly reflect future delivery*".

Given the context of a number of specific sites, such as the NCGM sites, throughout Wandsworth and the complicated nature of the S106 agreements already agreed and signed, it is considered that sites that have historic planning permission may not be able to achieve 35% given the committed costs and obligations that have already been set and this would need to be assessed against viability.

As such, it is suggested that the policy wording is revised to allow for flexibility to account for viability assessment and amendments to sites with existing planning consents. It is suggested that "*subject to viability*" is added to points A and B of Policy LP23.

NPPF: effective

No comment.

NPPF: consistent with national policy

Paragraph 22.14 of the Publication Local Plan states:

"The Council has undertaken a 'whole Plan' viability assessment. However, it is recognised that the housing and commercial property markets are inherently cyclical such that a fully policy compliant scheme may make some development proposals unviable at the time of submitting a planning application. The Plan sets out the approach that the Council will take to assessing such proposals and the mechanisms that it will adopt to ensure that schemes contribute fully should viability improve."

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This is not considered to be in compliance with the approach established in national policy. The NPPF begins from an assumption that all policies in an up-to-date local plan are achievable and hence viable, and therefore the scope for applicants to contest the viability of policies is much reduced. The obligation, therefore, at the plan-making stage is on the plan-maker to ensure that the policies in the local plan are viable and will not jeopardise delivery of the plan objectives.

The *Local Plan Viability Study*, dated January 2022 observes at paragraphs

	<p>7.20 and 7.21 that the 50% affordable housing target could cause difficulties against some typologies. Table 7.5 on pages 88-89 further shows that some typologies are unviable. As such, it is considered that the policy should be updated to ensure that these requirements and targets are 'subject to viability'.</p> <p>Suggested amendments to policy</p> <p>Revision to the proposed affordable housing tenure mix to reflect London Plan Policy H6 and the Fast Track Approach; Addition of 'subject to viability' to points A and B of the policy.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	<p>Comment noted.</p> <p>First Homes fall into the broad definition of affordable housing and are an intermediate product. They are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. The housing mix sought in policy LP23 is in accordance with the London Plan.</p> <p>The Whole Plan Viability Assessment states that the approach to assessing plan viability should recognise that it can only provide high level assurance that the policies within the plan are set in a way that is compatible with the likely economic viability. It cannot guarantee that every development in the plan period will be viable, only that the plan policies should be viable for most sites at the current time.</p> <p>Other parts of the policy, including criteria E, and the London Plan, make it clear that viability is a key factor in seeking affordable housing and, as such, it does not need to be repeated in criteria A and B.</p>
Proposed Change	Amend para 17.13 to read, ' In accordance with the <i>The</i> updated Planning Practice Guidance, <i>requires</i> 25% of all homes required <i>delivered</i> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <i>should be</i> discounted by at least 30% against the market value, <i>acknowledging the variance of market conditions across the borough</i> . The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'

Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	560
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Justified Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP34 Managing Land for Industry and Distribution London Plan conformity</p> <p>Policy LP34 seeks to protect the primary function of NCGM for a wholesale retail facility. This accords with London Plan Policy E4 and its requirement to make provision for the operation of wholesale markets.</p> <p>NPPF: positively prepared No comment. NPPF: justified</p> <p>Policy LP34 states that the railway arches adjacent to NCGM should be protected for wholesale retail purposes. It is noted that this policy has been updated since the Regulation 18 “pre-publication” version to clarify that this relates to the railway arches immediately adjacent to the wholesale market and not those other arches near to the wider NCGM surplus land sites, particularly at the Apex Site. This change is supported by VSM.</p> <p>NPPF: effective No comment. NPPF: consistent with national policy No comment. Suggested amendments to policy None</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.
Council Response	Support noted.
Proposed Change	No changes required.
Consultee Full Name	Mrs Dinny Shaw
Consultee Organisation Details	Planning Director VSM (NSGM) Ltd
Agent Full Name	Miss Alice Hawkins
Agent Organisation Details	Senior Planner Turley
Comment ID	561
Title	LP36 Railway Arches
Number	Policy 47
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy LP36 Railway Arches London Plan conformity No comment. NPPF: positively prepared No comment. NPPF: justified Policy LP36 states that the railway arches immediately adjacent to NCGM should be protected for wholesale retail purposes, as per the change in above policy LP34.

For the other arches near to the NCGM site, VSM considers that a range of commercial (Use Class E) and appropriate sui generis uses should be permitted – this will allow for flexibility particularly in the current economic climate.

It is noted that additional text has been added to clarify the use of the railway arches specifically within the NCGM site and this states that “*The use of railway arches adjacent to the rest of the NCGM site should support the creation of the Food and Horticultural Quarter as set out in the Nine Elms Cultural Strategy and should reflect the connectivity and place-making role that these locations will perform*”. This approach is generally supported by VSM, however it is recommended that further clarification is provided as to the uses that would be considered acceptable (i.e. Class E retail, restaurants / café, business / light industrial and leisure).

It is noted that the recently adopted LB Lambeth Local Plan (2021) has a railway arches policy (ED6), which states “*the use of railway arches within London Plan Opportunity Areas and major district and local centres for commercial, business, service, leisure and community uses and appropriate sui generis uses will be supported...*”. The railway arches in the Nine Elms area fall within the same wider Vauxhall, Battersea and Nine Elms Opportunity Area that straddles both LB Wandsworth and LB Lambeth. It is considered appropriate and robust that railway arches within the same Opportunity Area should be treated the same across both authority boundaries.

In light of the above, it is recommended that as a minimum part A.1. of the draft policy LP39 is amended to state “*the use of railway arches within town and local centres, the CAZ and London Plan Opportunity Areas for town centre uses (including community business, retail, leisure and appropriate sui generis uses) and distribution uses (B8) will be supported....*”.

NPPF: effective

No comment.

NPPF: consistent with

No comment.

national policy

Suggested amendments to

The policy wording should be amended as above to include town centre uses as appropriate in railway arches within the CAZ and updated to note which uses would be appropriate to support the Food and Horticultural Quarter.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

VSM have an interest in developing land identified as a site allocation and are currently in the process of bringing forward large scale redevelopment under a existing hybrid consent at New Covent Garden Market.

Council Response

General support for the previous amendments relating to the NCGM site noted. It is agreed that further clarification could be provided as to which uses would be considered acceptable.

As set out in the Council's previous response to representations made by VSM (NSGM) Ltd, it is not necessary to include reference to the London Plan Opportunity Area within LP36.A.1, as there is only a very small area of the VNEB OA that is not coterminous with the CAZ, and this is predominantly residential in nature. The policy approach as set out is considered

	consistent with the ambitions of the VNEB OAPF, and sensible in the context of Lambeth's policy approach - noting that they have not raised any concerns on this matter. Further, it is also noted that such an approach is not necessarily appropriate for other nascent Opportunity Areas, such as at Clapham Junction.
Proposed Change	Amend paragraph 18.58 as follows: "...It may be appropriate to introduce some wider town centre uses <i>(such as retail , leisure and cafes/restaurants) or office/ light industrial uses</i> within the arches toward the north-eastern tip of the market, in order to..."
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	562
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Consultation on the Wandsworth Publication Draft Local Plan (Regulation 19) Representations made on behalf of London Square and Sainsbury's The Town and Country Planning (Local Planning) (England) Regulations 2012</p> <p>Quod is instructed by London Square and Sainsbury's to submit representations to the Wandsworth Publication Local Plan Regulation 19 (hereby the "Reg 19 Plan"). These representations are submitted within the consultation period that runs from 10th January to 28th February 2022, and principally relate to the Sainsbury's car park site in Balham town centre (Site Allocation BA1).</p> <p>1 Executive Summary</p> <p>Site Allocation BA1 Sainsbury's car park is a well-used car park owned by Sainsbury's which supports the Sainsbury's store which anchors Balham High Street.</p> <p>Quod raises several concerns with the Reg 19 Plan as policies within it do not meet the tests of soundness. We have identified mitigating measures, through modifications, to make the policies sound, and would welcome the opportunity to work with Wandsworth Council (the 'Council') to address these prior to submission to the Secretary of State.</p>

This is a complex site, as any redevelopment will need to maintain the retail car parking function of the site which supports the Sainsbury's store, and at the same time provide a well-designed, phase development which contributes to the economic success of Balham Town Centre.

The principal concern is that the Council has taken an overly mechanistic approach to building heights across the borough without undertaking the necessary evidence-based assessment required by London Plan Policy D9. The approach that the Council is seeking is summarised in the Whole Plan Viability Assessment ***“The revised tall buildings policy is intended to strictly apply so that proposals exceeding the appropriate height range will be refused on design grounds”***¹.

The very detailed and intricate tall and mid-rise building zones and buildings heights proposed are not justified. Further, in respect of the proposed heights and tall building zone applied to Site Allocation BA1, it is apparent that the limited evidence-based assessment has not been carried across into the maps contained within Appendix 2.

Policy LP4 Tall Buildings requires forty criteria to be assessed for tall building proposals (seven storeys and above) which is not a proportionate and succinct approach. It results in duplication. The policy does not recognise that there may be some circumstances, where compliance with the plan (when read as a whole) requires flexibility to be applied for building heights and zones at the determination stage of a planning application. Without modification, the approach to building heights may undermine the deliverability of the plan.

A summary of our objections is set out in Table 1 below. Table 1: Summary of Reg 19 Plan Objections

Policy

Reason for non-conformity

Strategic Policies

We believe that Policy LP4 Tall Buildings and Appendix 2 should be included within the strategic policy schedule due to the strategic implications that this has on the plan as a whole. The deliverability of the housing capacities resulting from LP4 should be viability tested taking into account other strategic policies of the Reg 19 Plan.

Succinct Plans

The NPPF requires succinct plans which avoid duplication. The Reg 19

Plan contains duplication across several policies. It is an important planning principle that the development plan should be read as a whole and therefore duplication across policies should be avoided. Design guidance duplication occurs in Chapter 8 Placemaking – Area Strategies; Chapter 4 to 12 Area Strategies including the Site Allocations; and Chapter 14 Achieving Design Excellence. Inconsistencies also occur between the Reg 19 Plan and the Council's 2021 Arup Urban Design Guide (the 'UDS 21').

Early and Effective

Engagement

The NPPF requires plans to be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees. The Reg 19 Local Plan consultation is the first opportunity that stakeholders have been able to review and comment on the draft Plan, including notably the Council's proposed approach to tall buildings (LP4 and Appendix 2). Given the wider implications of this policy, it is considered that earlier and more effective engagement should have been undertaken.

SDS1 - Spatial

The policy has not been positively prepared or justified. The housing target for the plan period should be revised to 29,250 homes to accord with Table 4.1 of the London Plan.

The policy underestimates the housing capacity of Balham (72 homes in total). SDS1(B) is inconsistent with Housing and Economic Land Availability Assessment (the 'HELAA') (130 homes) and the UDS 21 which indicates a housing capacity solely for the Sainsbury's car park site of 130 homes and 4,500sqm of non-residential. Our own analysis indicates that housing capacity could be c.160 within the height parameters defined by the UDS 21.

Development Strategy

2023 - 2038

Chapter 3 PM1

Whilst we support the statement at paragraph 3.11 and PM1 (B) Area Strategy and Site Allocation compliance, it is unclear whether this policy applies to LP4 and Appendix 2. Further clarification is required.

Map 3.2

Site

London Square and Sainsbury's supports the allocation of Sainsbury's car park as a development plan allocation recognising its important car park function and the opportunity for development optimisation above this.

Allocations

PM8 – Balham

The policy is not justified due to inconsistencies with the Council's evidence base.

Site Allocation BA1

London Square and Sainsbury's support the site allocation for mixed use development including residential, commercial and open space with the re-provision of the car park. There are however inconsistencies with national policy which require modification.

Sainsbury's Car Park, Bedford Hill, SW12

LP4 - Tall Buildings and Appendix 2

The policy is not justified or effective. It is inconsistent with Policy D9 of the London Plan. Whilst it proposes very detailed tall and mid-rise building zone boundaries and heights which must be adhered to, it has not been subject to the analysis required by LPD9 Part (c) to justify such a restrictive approach. The zones and heights are not therefore justified by the UDS 21, and on occasion directly conflict with the undertaken analysis.

The policy is also inflexible as it does not permit heights beyond those prescribed or buildings at height outside of the prescribed zones. This is necessary given the broad assumptions undertaken in the evidence base, and the overly constrained zones and heights applied in policy.

Site Allocation BA1, a tight urban 0.6ha site, is subject to three different height parameter zones including 0-4 storeys; 5 storeys (incorrectly applied as this should be 6 storeys); and 7-8 storeys. The heights and zones are based upon the high-level analysis of one triangular design solution tested for the site, which creates impacts related only to that design, and which can be mitigated by alternative designs. LD4 does not, allow for alternative design solutions which may not have the same impacts, and may yield an enhanced proposal.

London Square and Sainsbury's consider that the tall building zone should be expanded across the whole site and should increase to nine storeys.

London Square and Sainsbury's has tested the effect of the draft zones and heights proposed by LP4 Appendix 2. This could result in a residential capacity of 140-160 homes at BA1, which is above the capacity identified in SDS1 for the whole of Balham Town Centre. A revised capacity should be applied to Balham.

London Square and Sainsbury's has tested the financial deliverability of

72 homes (SDS1); 130 homes (UDS 21); and 160 homes (site capacity within height parameters) taking into account the Council's affordable housing policy. It can be demonstrated that a proposal of 72 homes is not deliverable; and at 130 homes and 160 homes the development would fall significantly short of the Council's affordable housing policies. It is therefore necessary to modify Policy LP4 to permit flexibility in order to meet other policies within the plan.

Policy LP23

-

To ensure consistency with the London Plan and National Policy.

Affordable Housing

Policy LP24 – Housing

To ensure consistency with the London Plan.

Mix

4

Policy LP38 -

To ensure consistency with the London Plan and National Policy.

Affordable and Open

Workspace

Policy LP51 - Parking, Servicing and Car Free Development

We strongly encourage the Council to build flexibility into Policy LP51 to reflect the wording of London Plan paragraph G of Policy T6.3

2 London Square

London Square is a specialist in developing homes that truly enhance the capital, delivering much needed high-quality housing and responding to the needs of the capital. London Square has completed 17 first class development sites in the capital and has a proven track record in delivering high-quality homes in places people love to live. London Square's award-winning approach to design has been recognised by the industry with numerous awards, including an impressive collection from WhatHouse, Evening Standard and RESI.

London Square has been appointed by Sainsbury's long leasehold owners of the 147-151 Balham High Rd, London SW12 9AU store and car park; to consider proposals for the store's car park for a mixed use housing-led redevelopment.

3 Test of Soundness

London Square and Sainsbury's broadly welcomes the approach taken by Wandsworth Council to renew its local plan and add further guidance on how it seeks to transform its town centres into major assets for the Borough and deliver new homes in accordance with the increasing housing targets identified in the London (1,950 homes per annum).

To meet the tests of soundness, the Regulation 19 Plan must remain in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. It must also meet the tests set out in paragraph 35 of the National Planning Policy Framework ('NPPF') being positively prepared; justified; effective; and consistent with national policy. The tests will be applied to non-strategic policies in a proportionate manner.

Section 38(6) of the Planning and Compulsory Purchase Act 2004, taken with Section 70(2) of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. For this reason, it is imperative that the development plan is fit for purpose and sound.

The NPPF requires plan-making to achieve the following2:-

Succinct and up-to-date plans (paragraph 15)

Be prepared positively, in a way that is aspirational but deliverable (paragraph 16)

Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees (paragraph 16)

Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant) (paragraph 16)

Our representations consider the soundness of the Reg 19 Plan and specifically those policies that relate to the Sainsbury's Balham car park site (Site Allocation BA1).

4 Strategic Policies

Paragraph 1.12 of the Reg 19 Plan lists the strategic policies of the plan. This includes, inter alia, Policies SDS1 Spatial Development Strategy; PM1 Area Strategy and Site Allocations Compliance; and PM2 to 10 – Place-based policies for each Area Strategy.

Policy LP4 Tall Buildings is not included, which we consider is an omission. Strategic policies are subject to full weight of the soundness tests³, and set out an overall strategy for the pattern, scale and design quality of places⁴ and strategic priorities. Given the impacts on the whole plan viability, we consider that the policy (and resulting housing capacities) should be subject to viability testing when considered against other policies within the plan, including affordable housing.

5 Succinct Plans

The NPPF requires succinct plans which avoid duplication⁵. The Reg 19 Plan contains significant duplication across policies. It is a fundamental planning principle that the development plan should be read as a whole and therefore duplication across policies should be removed.

The design guidance is unnecessarily duplicated in Chapter 8 Placemaking – Area Strategies; Chapter 4 to 12 Area Strategies including the Site Allocations; and Chapter 14 Achieving Design Excellence. Inconsistencies occur where there is reference to the Council's UDS 21.

6 Flexibility in Plan Making

The NPPG (Paragraph: 001 Reference ID: 61-001-20190315, Revision date: 15 03 2019) confirms that the plan-making framework allows flexibility in the way policies for the development and use of land are produced.

Whilst we support the statement at paragraph 3.11 of the Reg 19 Plan that when determining planning applications, consideration of principles applied to site allocations will be important, subject to an up-to-date assessment of need and the agreed viability position of the scheme to ensure that site allocations remain deliverable, it is unclear if this statement applies to LP4. We believe that it should.

We also support PM1 (B) which states that proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy or Site Allocations on neighbouring sites. It is unclear if this policy applies to LP4 and Appendix 2. Further clarification is required.

	<p>15 Conclusion</p> <p>On behalf of London Square, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level.</p> <p>Quod would like to engage further with the Council's policy team and would welcome the opportunity to meet with the Council and discuss these representations in greater detail, prior to submission to the Secretary of State.</p> <p>1 Whole Plan Viability Assessment January 2022, paragraph 1.47. 2 NPPF (2021) Chapter 3 3 NPPF paragraph 36 4 NPPF paragraph 20 and 21 5 NPPF paragraph 15 and 16</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	563
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

<p>Soundness - Complies with Duty to Co-operate?</p>	
<p>Details of reason(s) for representation</p>	<p>7 Policy SDS1 (A) Spatial Development Strategy 2023 - 2038 & Table 2.2 – OBJECT</p> <p>Policy SDS1 (A) sets a strategic target to provide a minimum of 20,311 new homes by 2038 (1,354 homes per annum for 15 years). We are concerned that this underestimates the housing need required by Table 4.1 of the London Plan which seeks 19,500 homes across ten years (1,950 homes per annum for 10 years). Extrapolated across the 15-year period this would require at least 29,250 homes.</p> <p>Supporting text to Policy SDS1 indicates that the Council has adjusted its figures due to the oversupply of housing completions achieved and forecast to be delivered up to 2026, however as these completions are not guaranteed, the Council should be seeking to exceed its minimum targets. It is not considered appropriate to manually adjust down the annual housing target required by the London Plan.</p> <p>This is particularly important as the Council has failed to deliver against the current target of 1,950 homes in the last three years (18/19 - 1,877; 19/20 – 1,359; 20/21 – 1,422)⁶ highlighting the challenges of meeting this figure.</p> <p>Table 2.2 'New Homes Distribution' indicates a capacity of 24,380 homes, which would represent a short-fall against the revised 15-year target of 29,250 homes based on the London Plan annual targets for Wandsworth. We consider that the minimum housing requirement should be revised to 29,250 homes.</p> <p>8 Policy SDS1 (B) Spatial Development Strategy 2023 - 2038 & Table 2.2 – OBJECT</p> <p>London Square and Sainsbury's support the identification of Balham within Policy SDS1 'Spatial Development Strategy' as a location with a strategic economic role and/or opportunities for regeneration. The Council's capacity for new homes in Balham is identified as 72 homes over the total Local Plan period (i.e. equating to 4.8 homes a year over the Local Plan period or just 0.35% of the strategic housing target in Policy SDS1 (A)). Footnote 2 states that this capacity is derived from the Council's HELAA for the period 2023/24 to 2037/38.</p> <p>We have reviewed the HELAA and it is unclear how a capacity of 72 homes has been derived. It is also unclear if the capacity referred to in SDS1 Table 2.2 relates to Balham town centre as a whole, or the only site allocation within Balham which is Site Allocation BA1 Sainsbury's Car Park, Bedford Hill. Further explanation of this is required.</p> <p>We are concerned that the proposed housing capacity of 72 homes significantly underplays the capacity of Balham town centre, which is identified in Draft Policy SDS1(A)(I) as a priority location for development. The proposed housing capacity is also an underutilisation of accessible brownfield land contrary to paragraph 125 of the NPPF.</p> <p>We also note that the proposed housing capacity does not align with the HELAA, which suggests a capacity for 130 homes in Balham⁷. The UDS 218 indicates a capacity solely for the Sainsbury's car park site of 130 homes. It is therefore unclear why Policies SDS1 and PM8(B)(1) 'Balham' are inconsistent with the UDS 21. London Square and Sainsbury's has tested the effect of LP4 Appendix 2 (zone and heights) and notes that this could result in a residential capacity of 140-160 homes. The inconsistencies between SDS1, HELAA, UDS 21 and actual site capacities should be resolved.</p> <p>In review of the Council's own evidence base: we note that the UDS 21 allocates Site Allocation BA1 within character Area A1, which it is identified as having low sensitivity whilst being a location with a higher probability of change, and therefore it is identified as a site with the highest probability for development capacity⁹. The supporting text states that these areas "are the most likely to have the greatest development capacity, with a high probability of change compared against a low sensitivity, including areas such as some estates in East Putney Residential, Battersea Residential and Tooting Residential; Wandsworth Town Centre; some industrial plots within the Wandle Valley; parts of Clapham Junction Town Centre and <u>Balham Town Centre</u>; and Nine Elms Opportunity Area".</p>

The resulting capacity of 72 homes for Balham, one of the Borough's major district centres, is not commensurate with these characteristics. If the capacity is applied 100% to Site BA1, it would represent a housing capacity of only 114 dwellings per hectare ('dph'), which is substantially below the policy expectations for a highly accessible town centre site. As a PTAL 4-6 site, and with an urban/central character using the former London Plan (2016) density matrix (Table 3.2), a density of 240 - 405 dwellings per hectare would be deemed appropriate, equating to a housing capacity of 144 - 255 homes for Site BA1.

It is also unclear why other town centres, the rest of the borough, and borough wide small sites have been identified for greater housing growth despite having less appropriate characteristics in which to accommodate it and be sequentially a lower destination for housing delivery as set out in Policy SDSI(A)(I).

Please also see our objections in respect of Site Allocation BA1 and LP4 which promote an increased housing capacity for Balham, and the Sainsbury's car park site itself.

6 Reg 19 Plan Table 2.3

7 HELAA (2021) Appendix A Additional Housing Supply Tables

8 Arup Design Study Urban Design Study - Executive Summary Characterisation, development capacity and design guidance (December 2021) page 216

9 Arup Design Study Urban Design Study - Executive Summary Characterisation, development capacity and design guidance (December 2021) page 8, 9 and 10

**Change(s)
considered
necessary**

**Wishes to attend
Hearing Session**

Reason why

Council Response

Comment noted.

First, the housing requirement figure of 20,311 is based on the London Plan requirement for Wandsworth to 2028/2029 and a combination of the small sites target and SHLAA sites, which reflects the Plan's suggested approach to meeting housing need beyond 2029.

The figures in the plan at para 2.104 do, in fact, show a small deficit for the years 2019-2023, but this is more than compensated for by the years prior to 2019, when completions were at a higher rate.

Housing completions and projections will be monitored throughout the plan period.

The capacity for Balham is derived from the HELAA, and site BA1 provides a proportion of this capacity. The HELAA, prepared in accordance with national planning policy guidance, sets out at section 2.5 the reasons why estimated development capacities for each individual site are not made public (and defines the approach in the remainder of part 2). Site estimates and the overall housing capacities for areas and the borough as a whole are established through a design-led approach to ensure that strategic London Plan targets for housing can be satisfied over the plan period. Individual sites will come forward over the plan period and will be able to establish much more effectively the housing numbers based on a detailed understanding of site-specific viability, deliverability and an assessment of the geographical and policy context. For the purposes of meeting the target, individual sites are considered as a part of the whole supply, and are not assessed as part of the supply independently.

	The scenario in the UDS is not intended to be a masterplan for what is acceptable. It was purely an aid to informing the tall building zone and should not be read in isolation. The purpose of the scenarios is described on p. 212; 'the scenarios developed are prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site specific masterplan proposals'.
Proposed Change	No change considered necessary.

Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	564
Title	Site Allocations
Number	Map 3.2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Map 3.2 Site Allocations – Support London Square and Sainsbury's supports the allocation of BA1 as a site allocation. It comprises the only strategic site for Balham Town Centre. This is a deliverable site allocation, which requires flexibility within the development plan as a whole, and in particular Policy LP4 to ensure its deliverability.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	565
Title	PM1 Area Strategy and Site Allocations Compliance

Number	Policy 2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PM1. Placemaking – Area Strategy and Site Allocations Compliance – Comment</p> <p>Whilst we support the statement at paragraph 3.11 of the Reg 19 Plan that when determining planning applications, consideration of principles applied to site allocations will be important, subject to an up-to-date assessment of need and the agreed viability position of the scheme to ensure that site allocations remain deliverable, it is unclear if this statement applies to LP4. We believe that it should.</p> <p>We also support PM1 (B) which states that proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy or Site Allocations on neighbouring sites. It is unclear if this policy applies to LP4 and Appendix 2 and further clarification is required.</p> <p>The Whole Plan Viability Assessment advocates this approach. Paragraph 8.11 states that for future developments, principally retail and other town centre use developments (excluding offices), where the Reg 19 Local Plan may raise the risk of development being unviable, there may need to be provision for some flexibility to ensure a fully deliverable plan. This may include introducing flexibility in on-site and off-site developer contributions, and leaving the market to deliver the sites.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. To provide greater certainty, part B of Policy PM1 is proposed to be deleted as this is considered to repeat section 38(6) of the Planning and Compulsory Purchase Act 2004.
Proposed Change	<p>Amend Policy PM1 criteria B as follows:</p> <p>B. Proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified. In such circumstances, the development must not prejudice the delivery of the Local Plan's Vision and Objectives, the Objectives of the Area Strategy, or Site Allocations on neighbouring sites.</p>
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford

Agent Organisation Details	Director Quod
Comment ID	566
Title	PM8 Balham
Number	Policy 9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>PM8 A. Placemaking – Limb 1 – Support</p> <p>London Square and Sainsbury's supports the ambition for new development to strengthen the northern, southern and eastern ends of the town centre, and reduce the dominance of surface car parking particularly to the eastern end of the centre.</p> <p>PM8 A. Placemaking – Limb 3 – Object</p> <p>We acknowledge the principle of the Reg 19 Plan in seeking to reinstate a consistent building height along Balham High Road. Allowances should be made that where a four-storey height is delivered along the primary frontage of the High Road, building heights behind may exceed four storeys, where appropriate. There are already several instances where a four-storey frontage is provided with taller buildings set back behind the High Road elevation and therefore this appears to be an overly conservative approach and flexibility should be applied.</p> <p>We also note that Map 23.30 allocates much of the High Road within a mid-rise building zone, which indicates that buildings of 5 to 6 storeys may be appropriate. This appears to conflict with the expectation of four storeys building along Balham High Road and Appendix 2 Tall Building Zone.</p> <p>PM8 A. Placemaking – Limb 7 – Object</p> <p>This limb requires proposals for tall and mid-rise buildings in Balham to only be supported in zones identified in Appendix 2 and that address the requirements of Policy LP4.</p> <p>Please see our comments on Policy LP4, requesting deletion of this limb and the introduction of greater flexibility.</p> <p>PM8 A. Placemaking – Limb 8 – Object</p> <p>Limb 8 requires development proposals to respect and enhance the views and vistas established in the UDS 21. Appendix 1 'Views and Vistas of Interest' of the UDS 21, only shows one view for Balham - I.2.1 A2 Balham Residential Fig.508: Alderbrook Rd looking south. This is endorsed by Figure 240 'TB-A1a-01 context map', which identifies no designated views or local views.</p> <p>In contrast, Reg 19 Plan Map 10.1 Spatial Area Map: Balham appears to identify seven valued views and vistas around the Sainsbury's car park site. This is inconsistent with this evidence base. The annotations on Map 10.1 should be deleted.</p>

	<p>PM8 B. Inclusive Growth – Limb 1 – Object</p> <p>Please see our objections made to Policies SDS1 (Part B) and LP4, and Site Allocation BA1 whereby we promote an increased housing capacity for Balham, and the Sainsbury's Car Park site.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. An area designated as a tall or mid-rise building zone does not mean it has capacity to receive tall buildings within the appropriate range across the whole extent. Every new development will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area including those going through planning, consented schemes and buildings under construction. It is considered that there is no conflict between PM8 A.3. and the height range of the mid rise building zone. The criteria of LP4 would require an applicant to justify a scheme's proposed height within the context of the findings of the UDS and identified height ranges of LP4 Appendix 2 and the relevant placemaking policy - in this case PM8. Policy LP4 (F) sets out relevant development criteria which would apply to the Balham High Road frontage of this site including the requirement for a stepped down approach and the need to respond appropriately in height, scale and massing to existing buildings in the surrounding area, and respect the scale of adjacent buildings and streets. PM8 A.3. sets out what may be appropriate in this context.</p> <p>The policy is considered sound and helps enhance important views in Wandsworth but to ensure the correct ones are protected the policy could be modified to ensure there is greater clarity as to which views are considered as part of the development process.</p>
Proposed Change	<p>Amend wording in PM8 Balham A(8) as follows:</p> <p>'Development proposals will be required to respect and enhance the <u>valued</u> views and vistas established in <u>Map 10.1 Spatial Area Map: Balham</u>, the Urban Design Study (2021)'</p>
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	567
Title	Balham Spatial Area Map
Number	Map 10.1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Map 10.1 Spatial Area Map: Balham – Object</p> <p>The following annotations on Map 10.1 should be revised:-</p> <p>The dark green arrows do not benefit from a key and should be omitted as they could be mistaken for the “valued view and vista” key</p> <p>The suggested location for new public open space should be relocated to reflect pre- application advice by Council officers, and to reflect the existing open space along Bedford Hill opposite Sistova Road.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The dark green arrows are the valued views and vistas.
Proposed Change	No change considered necessary.

Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	568
Title	BA1 Sainsbury's Car Park, Bedford Hill, SW12
Number	Statement 55
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>10 Site Allocation – BA1 Sainsbury’s Car Park, Bedford Hill, SW12 – OBJECT</p> <p>Reg 19 Site Allocation BA1 (Sainsbury’s Car Park, Bedford Hill, SW12) is the sole development site allocation for Balham Town Centre. The 0.63ha site relates only to the Sainsbury’s car park site, it does not relate to the wider Sainsbury’s store which is not available for development. It is an appropriate site for design led optimisation due to its high PTAL levels (PTAL 4-6) and central character which under the former London Plan (2016) would equate to a site capacity of 144 - 255 homes.</p> <p>Policy Context</p> <p>It is useful to explain the Government’s policy for the optimisation of accessible brownfield land, in particular car parks in locations well served by public transport, which are underutilised by virtue of having no built development above the ground level of car parking. For the avoidance of doubt, the car park is well used and supports the Sainsbury’s store which anchors Balham High Street, it is essential that its car parking function is retained.</p> <p>We consider that the essential objectives of the Government’s policy have not yet been achieved with the emerging Site Allocation BA1. In response to the Government’s commitment to delivering 300,000 homes a year by the mid-2020s, the Government published its report Fixing our Broken Housing Market (2017) which sought to make more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land. It addressed the particular scope for higher-density housing in urban locations that are well served by public transport; that provide opportunities to replace low density uses such as car parks in areas of high housing demand; or which offer scope to extend buildings upwards in urban areas by making good use of the ‘airspace’ above them.</p> <p>The NPPF subsequently set out policies to support the Government’s objective of significantly boosting the supply of homes. It seeks a sufficient amount and variety of land to come forward where it is needed; that the needs of groups with specific housing requirements are addressed; and that land with permission is developed without unnecessary delay. It also establishes a clear policy objective to optimise surplus brownfield land in accessible locations giving substantial weight and support to the development of under-utilised land and buildings where this would meet identified needs for housing. Building on car parks is given as a specific example.</p>

The London Plan ('LP') also recognises the importance of redeveloping car park sites, particularly those in accessible town centre locations. Policy GG2 'Making the best use of land' seeks to create successful, sustainable mixed-use places on brownfield land. The policy prioritises sites that are well-connected by existing or planned public transport and seeks to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density

development particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

LP Policy D3 outlines that if London is to accommodate the growth identified by the Plan in an inclusive and responsible way, every new development will need to make the most efficient use of land by optimising site capacity. All development is expected to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport or walking and cycling in order to achieve sustainable densities. Where these locations have existing areas of high-density buildings, expansion of these areas should be positively considered by Councils, where appropriate.

The principal housing policy within the LP is Policy H1. It seeks to increase housing supply having identified a need for 66,000 additional homes per year, including a target of 1,950 homes per annum for Wandsworth Council. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. Policy H1 requires Councils to optimise the potential for housing delivery and lists six sources of future supply. Three of these sources set out at Part B(2) (a, b and c) of the policy directly relate to the characteristics of the Sainsbury's car park site indicating its suitability for residential intensification. The policy refers to locations with existing or planned public transport accessibility levels (PTAL) of 3 to 6, which are located within 800m distance of a station or a town centre. Part B2(b) seeks the mixed-use redevelopment of car parks and Part B2(c) outlines support for housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.

LP Policy E9 requires development proposals to comprehensively redevelop out-of-centre retail for a diverse mix of uses in accordance with LP Policy SD7 to release the full potential of these sites for housing intensification; reducing car use and dependency; and improving access by walking, cycling and public transport.

LP Policy SD7 (town centres development principles) considers the strategic intensification of London's town centres. Councils are required to identify suitable sites for higher density, mixed use residential intensification that capitalises on the sustainability advantages of the locally available services and facilities within walking and cycling distance and current and future public transport provision. It provides specific examples of suitable sites including the comprehensive redevelopment of low-density supermarket sites and surface car parks.

Application of National Policy and the London Plan to Site Allocation BA1

The site represents one of the only major and available developable sites in Balham Town Centre, and therefore represents a key allocation in supporting Balham and the wider borough's housing and economic needs across the next plan period. Accordingly, the site allocation should identify a

minimum quantum of residential homes and/or commercial floorspace that may be deemed acceptable upon this Site. A minimum capacity will provide a more accurate housing capacity for BA1 and resolve the ambiguity between SD1 and the evidence base.

Any minimum housing capacity must also ensure a viable and deliverable site allocation. Quod has tested the mix of homes and commercial space referred to in policy SDS1 (72 homes) and the local plan evidence base (130 homes). Adopting all inputs from the Porter Planning Economics local plan viability study (January 2022) results in a negative residual land value for both options, allowing for modest abnormal costs to ensure Sainsburys can continue trading. This negative residual land value is prior to any allowance for a benchmark land value. Increased densities, again adopting all of the local plan viability study inputs, result in a positive residual land value. Given these points flexibility for a greater quantum of homes must be included if the site allocation is to be deliverable.

	We make some detailed comments below.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The capacity for Balham is derived from the HELAA, and site BA1 provides a proportion of this capacity. The HELAA, prepared in accordance with national planning policy guidance, sets out at section 2.5 the reasons why estimated development capacities for each individual site are not made public (and defines the approach in the remainder of part 2). Site estimates and the overall housing capacities for areas and the borough as a whole are established through a design-led approach to ensure that strategic London Plan targets for housing can be satisfied over the plan period. Individual sites will come forward over the plan period and will be able to establish much more effectively the housing numbers based on a detailed understanding of site-specific viability, deliverability and an assessment of the geographical and policy context.</p> <p>Car parking at site allocation BA1 Sainsbury's Car Park will be reduced to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels. The amount of car club parking would be decided as part of the development management process. The allocation does not suggest that the car park would be private and it is expected that the existing use of the car park for other town centre uses would be retained.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	569
Title	Paragraph
Number	10.14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference BA1 - Site Allocation Proposed Modification</p>

	<p>10.14 Mixed use development including residential, commercial, cultural, community and open space re-provision of the car park in <u>at</u> ground floor podium <u>and/or basement level</u>. Development <u>may</u> would trigger, <u>subject to viability, community and cultural obligations</u> that should be used <u>to</u> enhance the existing adjacent local cultural offer.</p> <p>Justification</p> <p>There is no evidence to suggest that the site should be used for cultural or community uses, or that these uses are viable. The broad policies which seek the consideration of cultural and community impacts and mitigation sufficiently address the issue. These uses should be removed. Pre- application advice has identified the scope for basement car parking which should be included in the allocation as referenced within paragraph 10.16 Access and 10.21 Site Layout.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The site allocation includes culture and community uses to build on the adjacent existing offer. The allocation for these uses had been identified and taken forward in discussions with the Head of Arts and Culture who identified this site as an opportunity and it ensures access to culture is available to all parts of the community. It is not considered necessary to update the allocation regarding basement parking, 10.16 mentions access at basement level.
Proposed Change	No change considered necessary.
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	570
Title	Paragraph
Number	10.17
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference</p> <p>BA1 - Development Contributions</p> <p>Proposed</p>

	<p>10.17 Parking - Car club provision may be considered acceptable in lieu of residential car parking should be provided on site. Proposals should designate an area provision to the south west corner of the site or an alternative appropriate location to allow Transport for London and/or other providers to provide cycle parking infrastructure to support commuters using Balham Station as a transport interchange <u>where demand is identified</u>.</p> <p>Modification</p> <p>Justification</p> <p>The current wording should be revised to accord with London Plan (Para 10.6.15) in respect of the delivery of car clubs.</p> <p>The intended provision of cycle parking to support commuters is understood, however, it should be made clear that the cost of delivering and maintaining this infrastructure will be the responsibility of Transport for London and should not be the liability of a developer, and only delivered where demand is identified</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The current wording regarding car clubs is considered sufficiently flexible, meets the guidance set out in the London Plan and should not be changed.</p> <p>The site allocation does not suggest who is responsible for the delivery and maintenance of the cycle parking infrastructure and its inclusion is considered unnecessary.</p>
Proposed Change	No changes are considered necessary.
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	571
Title	Paragraph
Number	10.18
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy Reference BA1 – Design Requirements</p>

Proposed

10.18 Movement – A north/south pedestrian route shall be provided

Modification

between Bedford Hill and Balham Station Road to improve permeability in

moving around the town centre. Proposals should include a permeable site layout to ensure the open space is accessible ~~and the frontage does not dominate the townscape.~~

10.21 Site Layout – A triangular-shaped perimeter block with retail/commercial uses on the ground floor with active frontages to all three sides, and with a basement and first floor car park as part of the podium is suggested. The interior of the block above the podium would be suitable for private amenity space to serve the residential units. Street frontages are required on all sides of the site, including to the elevated railway line ~~to the~~ south of the site with active retail and commercial uses on the ground floor. ~~Whilst some retail/commercial use could be accommodated at first floor level,~~ Upper floors ~~should~~ accommodate residential units. ~~Opportunities to improve~~ pedestrian links along the western edge from north to south ~~should be considered~~. Frontages to the east should replicate the retail and commercial uses opposite it on Bedford Hill.

10.22 Massing - Taller elements should be located ~~close towards~~ the west frontage to face the existing Sainsbury's building. Heights should reduce towards the existing ~~four-storey town centre character~~ low-rise development along Balham Station Road and Bedford Hill. Massing should be considerate of the ~~modest~~ buildings on all sides of the site and the existing local detailing and materials when preparing proposals. The frontages on to Bedford Hill and Balham Station Road should ~~be broken down~~ ~~consider~~ daylight/sunlight impacts on ~~residential properties along~~ Bedford Hill properties.

10.23 Nature - Green roofs should be provided to the built form to enrich biodiversity and trees should be planted to frontages.

10.24 Building Heights ~~(Revised in accordance with our comments on LP4 and Appendix 2)~~ – In accordance with the tall building maps in Appendix 2, ~~part of the site is located in the Balham tall building zone TB- A1a-01 and mid-rise building zone MB-A1a-01 and should be developed in broad accordance with LP4. The maximum appropriate height range for the zone is 7 to 8 storeys, and the appropriate height range for the site must be in accordance with Policy LP4 and the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be~~

~~appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings):~~

~~In accordance with the mid-rise building maps in Appendix 2, the remainder of the site is located in mid-rise building zone MB-A1a-01 (which acts as a transition zone for to tall building zone TB-A1a-01) to which the maximum appropriate height for the zone is 5-6 storeys. The height of developments within this at zone should not exceed the heights of, and be in accordance with Policy LP4, and the mid-rise building maps in at Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings). Development proposals for mid-tier buildings up to 6-storeys will not be supported.~~

Justification

The proposed revisions are necessary to make the policy succinct, avoid duplication and sound.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Small typographical errors identified in paragraph 10.21 could be amended to ensure clarity for the reader, however other the amendments are not considered necessary to ensure the soundness of the Local Plan.</p>
Proposed Change	<p>Amend wording to paragraph 10.21 as follows:</p> <p>'10.21 Site Layout – ... Street frontages are required on all sides of the site, including to the elevated railway line <u>to the</u> south of the site with active retail and commercial uses on the ground floor. Whilst some retail/commercial use could be accommodated at first floor level, upper floors could accommodate residential units, and pPedestrian links along the western edge from north to south <u>should be improved</u>.</p>

Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	572
Title	Achieving High Quality Places and Design Excellence
Number	14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 14 Achieving Design Excellence - Policy LP4 Tall Buildings / Appendix 2 Tall Building and Mid-rise Building Maps - OBJECT</p> <p>Summary</p> <p>The Council has taken an overly mechanistic approach to the allocation of tall building locations and heights in the Borough, supported by an unnecessary layer of policy which allocates mid-rise building locations and heights. The approach is overly complex, is inconsistent with national and London Plan policies, has not been viability tested and may prejudice the ability of development sites to achieve other policies in the plan such as the required affordable housing levels and tenure and housing delivery targets.</p> <p>LP4 and Appendix 2 result in building heights which are not supported by a sufficiently robust evidence base. It is not therefore a sound approach to prescribe very detailed and inflexible medium and tall building zones and building lines for each allocation. The tall building zones prescribed in Appendix 2 do not reflect pre-application advice provided by Wandsworth Council to date, and in respect of BA1 do not correlate with the proposed site allocation boundaries.</p> <p>London Plan Policy D9 ('LP Policy D9')</p> <p>Policy D9 sets a minimum requirement for tall building in London to be no less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This is the equivalent of 7 storeys in total. It is therefore unclear why the Policy LP4 has applied the spirit of Policy D9 to mid- rise buildings of 5 and 6 storeys. This approach is onerous and does not conform with the London Plan. We consider that it would be more succinct to have a single tall building policy that defines zones up to a specific storey height; the final height of which would be subject to detailed testing at the application stage in accordance with LP Policy D9 and Policy LP4.</p> <p>LP Policy D9(B) 'Locations' (1) requires boroughs to determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. (2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans. (3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p>

Notably, LP Policy D9 explicitly requires the consideration of “other requirements of the plan”; that “locations and appropriate tall building heights should be identified on map in the development plan”; and that “tall buildings should only be developed in locations that are identified as suitable in Development Plans”. Where location and heights are prescribed in the development plan these should be informed by Part C of Policy D9 (Impacts).

LP Policy D9 does not require inflexible parameter heights, nor does it require tall buildings to only be developed at the heights identified in the development plan. It does however expect a detailed sieving analysis to be undertaken to identify appropriate locations for tall buildings.

This approach was recently tested by the Planning Inspectorate at the Brent Local Plan Review. The Report on the Examination of the Brent Local Plan 2019 -2041 published 17 January 2022 stated the following:-

The Brent Tall Building Strategy which outlined an assessment of suitable locations based on an assessment of the identified growth areas, existing building heights and townscape considerations such as protected views as well as areas with high public transport accessibility did not undertake a level of sieve analysis as detailed as that envisaged by the London Plan.

Subject to the main modifications identified, the approach to both tall buildings and the Intensification Corridors presents a sound approach which accords with both the London Plan and the Framework.

The Brent Council Tall Building Local Plan Policy BD2 was found sound on the following grounds, which included a degree of flexibility: -

It requires heights to be consistent with the general building heights shown on the plans¹⁰

The plans indicate the heights likely to be generally acceptable to the council¹¹.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location¹².

10 Brent Local Plan Policy BD2

11 Brent Local Plan paragraph 6.1.15

12 Brent Local Plan paragraph 6.1.15

There might be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable¹³.

LP Policy DP9 does not require a rigid inflexible approach, and as demonstrated, the flexible approach employed by Brent Council was deemed as sound by the Inspectors.

Application of Policy D9 within the Reg 19 Plan – Appendix 2

The Reg 19 Plan seeks to implement the requirements of London Plan Policy D9 at Appendix 2, and in respect of the Sainsbury's car park site at the following diagrammatical parts of the Reg 19 Plan:-

Map 14.1 Tall Buildings

Appendix 2 - Tall Building Map 23.1 Balham Tall Building Zone TB-A1a-01 and Map 23.2 Tall Building Zone TB-A1a-01 (appropriate heights 7-8 storeys)

Appendix 2 – Mid-rise Building Map 23.30 Balham Mid-rise Building Zone MB-A1a-01

Map 23.2 Tall Building Zone TB-A1a-01 and Mid-rise Building Map 23.30 Balham Mid-rise Building Zone MB-A1a-01 are enclosed at Figure 1.

London Square and Sainsbury's welcome the allocation of the Sainsbury's Car Park as an appropriate location for tall buildings, which would also reflect wider policies of the plan that seek to optimise the development potential of centrally located and accessible car park sites.

In this instance, the practical response by the Council to the requirements of LP Policy D9 has been to identify a tall building zone which is broader than the boundary for Site Allocation BA1, resulting in only a very small component of Site Allocation BA1 comprising a tall building zone of 7-8 storeys or 21-24m. This appears to conflict with the UDS 21 which uses one specific development scenario for BA1, which identifies 8 storeys at the rear of the site next to the Sainsbury's store as being acceptable. A further small strip of land around the tall building zone is identified as a mid-rise building zone (5 storeys or 15m). This is another non-compliance with the UDS 21, which identifies this as a 6 storey zone. The remainder of the site falls within neither zone indicating that buildings of up to 4 storeys only are acceptable. This again appears to be an error as the UDS 21 scenario testing supports buildings of 6 storeys along Balham Station Road. Only the perimeter of the site at the Bedford Hill junction with Station Road is considered sensitive in the UDS 21 thus requiring development up to 4 storeys (which we disagree with). These zonal graphical errors require addressing.

When comparing the tall building zone at Appendix 2 (see Figure 1) to Site Allocation BA1 and UDS 21: Figure 242 (see Figure 2) it appears that the zoning has slipped and inaccurately moved the tall building zone westwards and incorrectly away from Balham Station Road.

Notwithstanding these inaccuracies (which without prejudice should be addressed) we consider that the mid-rise tall building zone should be deleted, and that the tall building zone (up to 8 storeys) should be extended to cover the whole of Site Allocation BA1, supported by design criteria within the Site Allocation BA1. LP Policy D9 does not promote the identification of mid-rise building zones and heights. There are several policies (including LP1 to LP3) in the Reg 19 Plan, including the site

allocation itself, which will inform more detailed design such as the design principal to step down massing towards the permitter edge.

From our own analysis of UDS 21, it is unclear how the evidence concluded that, when undertaking a detailed sieve assessment using the criteria in London Plan D9 (C) that 0-4 storeys; 5 storeys; and

7-8 storeys are the appropriate heights for this site. Appendix A (page 213) 'Tall Buildings' confirms that tall building zone: TB-A1a-01: Balham Town Centre is justified by the undertaken analysis

scenario presented at page 215 for the Balham Town Centre sub-area (A1a). However, the evidence base for TB-A1a-01 (page 216) appears to only consider the site area of BA1 and outlines a development capacity of 130 homes and 4,500sqm of non-residential floorspace.

At Figure 3, we enclose the relevant extract for TB-A1a-01 (Figure 242) detailed in the UDS 21.

The assessment considers that the car park is a negative feature in a key town centre location with a relatively lower sensitivity to change. The zone of theoretical visibility (ZTV) indicates that visibility of the scenario is likely to be relatively contained to the residential streets surrounding the site. The assessment, and the resulting tall and mid-tier building zones are then defined by the impacts that this specific massing would have, rather consider a more generic form of development and encourage a design-led and more flexible approach to height and density.

Figure 3 - Urban Design Study (2021) – Figure 242

The assessment suggests that along Bedford Hill and the junction with Station Road, modelling of taller building scenarios for the site showed that a built form taller than 4 storeys would be likely to result in an unacceptable effect on townscape and views. This modelling does not form part of the evidence base, and independent modelling undertaken at the pre-application stage would indicate otherwise. It also advises that mid-rise building zones of 6 storeys would be acceptable, which conflicts with the Reg 19 Plan Site Allocation BA1 and Map 23.30 'Balham Mid-rise Building Zone'

which identifies areas of 5 storeys only.

Along Balham Station Road, the study states that modelling of taller scenarios on the site showed that built form taller than 4-6 storeys would be likely to result in unacceptable effects on townscape and views, in particular because of the perceived tunnelling effect of the railway retaining wall (equivalent to three storeys) on the opposite side, which would create a perception of little space for people or perception of green. Therefore, the scenario illustrates a mixture of 4-6 storeys in this area is considered appropriate in principle where set back from the road behind an area of public realm. This is a very specific impact arising from one tested design scenario, which has gone on to inform

the Reg 19 Plan tall building zone and height contour. Our concern is that this assesses just one development scenario, which has been used to inform the applied conclusion on acceptable massing for Site Allocation BA1, and thus appears to discount and remove any flexibility on alternative scenarios that might not result in a tunnelling effect or create a perception of little space for people or greenery. It also disregards other planning benefits associated with additional height and any positive townscape contributions a tall building of high design quality can make – for example, assisting legibility or marking public realm.

In its current form, if a development at seven storeys was able to achieve these design benefits and positive impacts, Policy LP4 would “not permit” the proposal. This is an extremely inflexible approach particularly as it concerns the sole draft allocation site designated in Balham Town Centre (i.e., a site identified as necessary to meet housing need). We therefore recommend the need for greater flexibility throughout the Plan because alternative design solutions could readily address the issues raised by the UDS 21 (or a change in height parameter to allow for increased site capacity).

The UDS 21 assessment concludes that:-

The scenario shows building heights stepping up to 8 storeys/24m in a small part of the site, which is considered appropriate in principle, and does not sit uncomfortably with the modest scale of the surrounding buildings. However, the relationship with the adjacent 3 storey buildings to the west would need further design consideration.

The scenario is considered not to adversely affect views from the railway, assuming good design principles, details, materials and quality ensure its frontages respond positively in all directions, enhancing overall identity and sense of place in these views. Views along well-balanced and tree-lined streets punctuated by landmarks.

None of the valued features, views or key features would be adversely affected by developments of up to 7-8 storeys if well designed and planned. Buildings of 7-8 storeys is considered to be the absolute maximum this site could accommodate, and this would depend entirely on a high quality design that is carefully placed within the plot in response to all the surrounding constraints and considerations.

The site does have potential for tall buildings, as a matter of principle, and that heights of 7-8 storeys are acceptable. The drafting of Policy LP4 does not however allow for this potential to be explored further.

The resulting drafting of Appendix 2 has resulted in the incorrect tall building zone; an incorrect height for the mid-tier zone, and an inflexible approach to interpreting the limited evidence base undertaken that does not appear to have robustly considered the impact tests of LP D9(C).

We therefore propose the following modifications.

13 Brent Local Plan paragraph 6.1.15

**Change(s)
considered
necessary**

Policy Reference

APPENDIX 2 - Tall Building Map 23.1 Balham Tall Building Zone TB-A1a-01 and Map 23.2 Tall Building Zone TB-A1a-01 (appropriate heights 7-8 storeys)

Proposed

Revise the Tall Building Map 23.1 Balham Tall Building Zone TB-A1a-01 and Map 23.2 Tall Building Zone TB-A1a-01 (appropriate heights 7-8 storeys) to extend across the Sainsbury's Car Park site and revise heights to 8-9 storeys.

Modification

Justification

To reflect detailed pre-application advice from Wandsworth Council, the Design Review Panel and the GLA following site specific analysis.

Policy

Mid-rise Building Map 23.30 Balham Mid-rise Building Zone MB-A1a-01

Reference

Proposed Modification

Delete Mid-rise Building Zone MB-A1a-01

Justification

To reflect detailed pre-application advice from Wandsworth Council and site specific analysis.

Wishes to attend Hearing Session

Reason why

Council Response

Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.

The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.

There is no error in the tall and mid-rise zones and are compliant with the UDS 2021. The scenario (UDS Figure 242) is not intended to be a masterplan for what is acceptable. It was purely an aid to informing the tall building zone and should not be read in isolation. As can be seen by comparing the scenario with the tall building zone and mid-rise zone, they do not exactly correlate. The purpose of the scenarios is described on p. 212 'the scenarios developed are prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site specific masterplan proposals'.

The site allocation and scenario are only part of the tall building zone, which is intended to extend further west to include the existing supermarket. The zones were drawn to accommodate further stepping down towards the roads;

- The reason for the set back from Balham Station Road is described on p.217 in the UDS as avoiding a tunnelling effect with the railway retaining wall and allowance for an area of public realm.
- The reason for the set back from Bedford Hill is described on p.217, to fit in with the grain and scale of Bedford Hill and the modest landmark of the Bedford pub. The wording 'mixture of 4-6 storeys in this area which is considered to be appropriate in principle, set back from the road behind an area of public realm' is important, as it is not the same as saying the scenario is appropriate.

•The tall building zone is described on p.177 as ‘set back from the roads and other existing buildings, and towards Balham High Road, whilst allowing for public realm adjacent to Balham Station Road.’

The mid-rise zone was not made 6 storeys as it would not be appropriate for 6 storeys to extend within the whole of the zone and therefore the zone is as intended. The mid-rise building policy approach of LP4 Part E is considered to be sound as it is based on a robust evidence base. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context; yet not sufficiently tall to be considered as London Plan definition tall buildings. The approach recognises that there are locations across the borough where there is potential for buildings which are of an increased height to their surroundings – but not sufficiently tall to meet the tall building definition.

The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.

The UDS sets out the character of the borough which has been divided into seven ‘places’ and 25 character areas. Each ‘place’ is introduced, followed by the character area profiles for the character areas within it. The profiles begin with the key characteristics of the character area, followed by valued features and negative qualities. These aspects aim to capture the key aspects of character at a high level. This analysis, coupled with the sensitivity and change analysis, development capacity assessment and consideration of existing and consented tall buildings mapping has informed the identification of the tall and mid-rise building zones and appropriate height range. The conclusions of this work has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery. In all cases, the acceptability of individual plots will depend on specific characteristics of the site.

An area designated as a tall building zone does not mean it has capacity to receive tall buildings within the appropriate range across the whole extent. Every new development will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area including those going through planning, consented schemes and buildings under construction. The criteria of LP4 would require an applicant to justify a scheme's proposed height within the context of the findings of the UDS and identified height ranges of LP4 Appendix 2. The Council considers the approach to planning for tall and mid-rise buildings is based on a robust and credible evidence base and has been developed within the vision and objectives of the Plan.

Proposed Change	No change considered necessary.
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	573
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

<p>Soundness - Complies with Duty to Co-operate?</p>	
<p>Details of reason(s) for representation</p>	<p>12 Policy LP23 (Affordable Housing) – OBJECT</p> <p>London Square support the Council's intention to adopt the London Plan's Fast Track Route for affordable housing. However, the Policy LP23 should define that the Fast Track Route will be available to developments that deliver a minimum of 35% affordable housing in line with Policy H5 of the London Plan. Accordingly, the following amendments are recommended:</p> <p>Policy Reference LP23 – Affordable Housing (B) Proposed Modification B. Development that creates 10 or more dwellings (gross) on individual sites must provide <u>a minimum of 35% affordable housing on-site (measured by habitable room) to qualify for the Fast Track Route</u> threshold approach set out by London Plan Policy H5.</p> <p>Justification In order to align with Policy H5, the draft policy wording should also be updated to define that the percentage of affordable housing shall be measured by habitable rooms (as detailed at Para 17.16).</p> <p>London Square object to the Council's proposed tenure split at 50% low-cost rest products, 25% First Homes and 25% other intermediate products as this limits flexibility within the intermediate tenure.</p>
<p>Change(s) considered necessary</p>	<p>To remedy this, the following modification is proposed.</p> <p>Policy Reference LP23 – Affordable Housing (C) Proposed Modification C. The Council will require an affordable housing tenure split of 50% low- cost rent products, <u>and 50% intermediate products, which should aim to provide 25% as First Homes and 25% other intermediate products.</u> A minimum discount of 30% will be applied to First Homes.</p> <p>Justification Whilst the affordable housing mix aligns with the adopted London Plan Policy H7 (30% low cost rent, 30% intermediate and 40% to be determined by the borough) and the national policy to provide a minimum of 25% of new homes as discounted First Homes, it is considered that the proposed affordable housing mix does not provide sufficient flexibility, and may discourage developers who are unable to accommodate First Homes within their business model, which may curtail the borough's ability to deliver the affordable homes it needs.</p>

London Square and Sainsbury's support the amendments to LP25 (Part G), which now allow the use of Vacant Building Credit in specific circumstances. The following amendments are proposed to streamline the policy wording.

Policy

Reference

LP23 – Affordable Housing (G)

Proposed

Modification

G. The application of the Vacant Building Credit (VBC) ~~is not appropriate in Wandsworth.~~ The use of VBC will only be considered in limited circumstances, where applicants clearly demonstrate there are exceptional reasons why it is appropriate and all of the following criteria are met:

1. The building is not in use at the time the application is submitted.
2. The building is not covered by an extant or recently expired permission.
3. The site is not protected for alternative land use.
4. The building has not been made vacant for the sole purpose of redevelopment.

London Square and Sainsbury's object to Part H) of Policy LP23, which requires affordable housing or financial contributions to be sought on all developments delivering new dwelling. To make the policy sound, the following amendment is proposed:

Policy

Reference

LP23 – Affordable Housing (H)

Proposed

Modification

H. The provision of affordable housing or financial contributions will be sought from any major development creating 10 or more ~~making provision~~ for new dwellings (gross) or the provision of residential accommodation with shared facilities.

Justification

The Planning Obligations NPPG (2019) is clear that obligations for affordable housing should only be sought for 'major residential developments', which is defined as 10 or more homes. Affordable housing contribution should therefore not be sought on residential development providing 9 or less homes, as this conflicts with the NPPG.

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted.

Policy LP23 cross refers to Policy H5 where the threshold approach and Fast Track Route are explained. This does not need reiterating in the Local Plan.

First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Changes are made to the supporting text to Policy LP23 to explain this. Uncertainty exists as to the deliverability and viability of First Homes throughout the borough, and no

	<p>First Homes have been secured in the borough to date. Given this uncertainty, it is agreed that a requirement for First Homes should be removed from the policy, and instead rely upon the reference to First Homes in national policy.</p> <p>Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability. It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. So therefore, it is considered that flexibility should be introduced into the wording to seek a balance of intermediate products - which should include First Homes - after the agreement of the low cost rented element, which would reflect those differing circumstances on sites across the borough.</p> <p>The Local Plan doesn't disapply the VBC. It defines circumstances in which it can be applied. The policy justification explains why the VBC has been treated in this way.</p> <p>Criterion (A) states that affordable housing will be sought in accordance with the London Plan, and criterion (B) provides the relevant thresholds. Criterion (H) is there to clarify that the policy applies to all C3 dwellings, for the avoidance of doubt.</p> <p>Introduction of 'at least' prior to the provision of 50% low cost housing stems from representations made elsewhere.</p>
Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the <i>The</i> updated Planning Practice Guidance, <i>requires</i> 25% of all homes required <i>delivered</i> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <i>should be</i> discounted by at least 30% against the market value, <i>acknowledging the variance of market conditions across the borough</i>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	574
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Application of Policy D9 within the Reg 19 Plan – LP4</p> <p>In addition to our concerns in respect of Appendix 2 and the UDS 21, we are also concerned with the approach taken for Policy LP4. Despite the policy defining very strict tall building zones and heights based upon the UDS 21. Policy LP4 still states that tall buildings in Tall Building Zones would only be appropriate where the development would not result in any adverse visual, functional, environmental and cumulative impacts. It requires planning applications for tall buildings to be assessed against the criteria set out in Parts C and D of the London Plan</p>

Policy D9 (this comprises twenty one criteria) and an additional nineteen local criteria set out at Policy LP4 (1 to 19). This would indicate that the analysis undertaken to define tall building locations and heights in Wandsworth by the UDS 21 is not sufficient in supporting the very detailed tall building zoning, particularly for BA1. If robust, then it would not be necessary to require planning applications to address a total of forty criteria to justify a tall building application that has been prescribed to a very small area of the town centre at a modest 7-8 storeys.

This does not appear to be proportionate and succinct planning that avoids duplication, particularly where LP4 (C) states that proposals for tall buildings will not be permitted outside the identified tall building zones; and (D) proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones, and the height of tall buildings will be required to step down towards the edges of the zone (unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area).

In our opinion, it would be more succinct to retain the policy as is but introduce flexibility which can be tested during the planning application process, as is the case with the Brent Local Plan.

We would suggest that the following wording is introduced as a modification: -

Heights to be consistent with the general building heights shown on the Tall Building Zone Maps.

Maps indicate the heights likely to be generally acceptable to the council.

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and deliverable when the plan is read as a whole.

Apply flexibility whereby circumstances where the quality of design of a development and its impact on character is such that taller buildings that exceed the general heights in these locations could be shown by applicants to be acceptable.

This is a necessity for Site BA1 as the evidence base has only tested one bespoke development scenario and has drawn the tall building zone and mid-tier zones based specifically on this proposal, which has inherent design faults.

This would also address paragraph 14.31 which states that "Development proposals exceeding the appropriate height will not be supported on design grounds". Duly, we suggest that the following modifications are undertaken to make Policy LP4 sound:

**Change(s)
considered
necessary**

Policy

Reference

LP4 - Tall and Mid-rise Buildings

Proposed

C. Proposals for tall buildings should ~~will~~ not be permitted outside the

Modification

identified tall building zones.

D. Proposals for tall buildings should be consistent with the general not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings may will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.

G. Proposals for mid-rise buildings should will not be permitted outside the identified tall and mid-rise building zones.

Proposed

The plans indicate the heights likely to be generally acceptable to the council.

-

Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location and that the site allocation is deliverable when the plan is read as a whole.

Paragraph 14.31 - Development proposals exceeding the appropriate height will not be supported on design grounds unless it can be demonstrated through successfully addressing the tests in LP4(B) that there are circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.

Justification

The policy should allow a degree of flexibility so that tall and mid-rise building may be permitted outside of the designated zones in exceptional circumstances.

This is particularly pertinent to mid-rise buildings, to which the Policy D9 of the London Plan makes no allowance for the identification of non-tall building zones (i.e. mid-rise buildings) through a Development Plan.

**Wishes to attend
Hearing Session**

Reason why

Council Response

Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.

The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.

The UDS sets out the character of the borough which has been divided into seven 'places' and 25 character areas. Each 'place' is introduced, followed by the character area profiles for the character areas within it. The profiles begin with the key characteristics of the character area, followed by valued features and negative qualities. These aspects aim to capture the key aspects of character at a high level. This analysis, coupled with the sensitivity and change analysis, development capacity assessment and consideration of existing and consented tall buildings mapping has informed the identification of the tall and mid-rise building zones and appropriate height range. The conclusions of this work has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery. In all cases, the acceptability of individual plots will depend on specific characteristics of the site. Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.

An area designated as a tall building zone does not mean it has capacity to receive tall buildings within the appropriate range across the whole extent. Every new development will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area including those going through planning, consented schemes and buildings under construction. The criteria of LP4 would require an applicant to justify a scheme's proposed height within the context of the findings of the UDS and identified

	heigh ranges of LP4 Appendix 2. The Council considers the approach to planning for tall and mid-rise buildings is based on a robust and credible evidence base and has been developed within the vision and objectives of the Plan.
Proposed Change	No changes considered necessary.
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	575
Title	LP24 Housing Mix
Number	Policy 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>13 Policy LP24 (Housing Mix) – OBJECT</p> <p>Policy LP24 is not in general conformity with LP H10 Housing Site Mix which acknowledges¹⁴ that a higher proportion of one and two bed units is appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.</p>
Change(s) considered necessary	<p>Policy Reference</p> <p>LP24 – Housing Mix</p> <p>14 LP Policy H10 (6)</p> <p>Proposed Modification</p> <p>E. The dwelling mix will be considered on a site by site basis and in applying the preferred housing mix regard will be given to:</p> <ol style="list-style-type: none"> 1. current evidence in relation to housing need; 2. the surrounding context and character;

	<p>3. the overall level of affordable housing proposed; and</p> <p>4. the financial viability of the scheme.</p> <p>5. generally a higher proportion of one and two bed units in locations which are closer to a town centre or station or with higher public transport access and connectivity</p> <p>Justification</p> <p>To be in general conformity with the London Plan Policy H10(6)</p>
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The amendment is unnecessary as it repeats London Plan policies. Appropriate decision making can be made through this and the other policies of the plan (including SDS1, LP1)</p>
Proposed Change	No change considered necessary

Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	576
Title	LP38 Affordable and Open Workspace
Number	Policy 49
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>14 Chapter 18 Building A Strong Economy - Policy LP38 (Affordable and Open Workspace) – COMMENT</p> <p>London Square and Sainsbury's object to the current policy that requires all development delivering any economic floorspace, regardless of size, to make a contribution to the provision of affordable and/or open workspace. Accordingly, a floorspace threshold should be set whereby only when exceeding the specified economic floorspace amount will a contribution towards affordable workspace be requested. The impact of delivering affordable workspace also needs to be assessed as part of the scheme's viability as a whole.</p> <p>To resolve our concerns, the following changes to Policy LP38 are recommended:</p>
Change(s) considered necessary	<p>Policy Reference</p> <p>LP38 – Affordable and Open Workspace</p> <p>Proposed Modification</p> <p>A. <u>Subject to scheme viability</u> all development that provides economic floorspace <u>in excess of 1,000sqm (GIA)</u> will be expected to contribute to the provision of affordable and/or open workspace, <u>for a period of 30 years unless otherwise agreed in perpetuity</u>; which will be secured by way of S106 planning obligation and/or conditions, with details provided in an Affordable Workspace Management Plan. Planning applications will be assessed in accordance with the following:</p> <p>1. Developments that would provide less than 1,000 sqm of economic floorspace will be expected to provide for a range of unit sizes, unless a specific end user has been identified and there is sufficient certainty regarding their occupation at the time of submitting the application; or if the proposed</p>

	<p>development is for a co-working space (or similar open workspace models):</p> <p>12. Developments that would provide more than 1,000 sqm of economic floorspace will, subject to scheme viability, be expected to:</p> <p>Justification</p> <p>The draft Policy does not provide sufficient flexibility and cannot therefore respond to changes in market conditions and demand. It should relate specifically to proposals which provide over 1,000sqm of economic floorspace only. Policy LP38(A)(1) is ambiguous and ineffective and should be deleted.</p> <p>We consider it unreasonable to apply a period of perpetuity without including a mechanism for release from this restriction. There are several scenarios whereby the developer could be prejudiced through application of this policy in the long term. For example: during a recession or if the existing business was poorly managed.</p> <p>As there is no flexibility to the current policy, this could also lead to the unintended consequence of workspace being vacant if neither a local business nor start-up space operator is willing, or able to take on the space. Flexibility to the wording should be added to allow for the workspace to revert to being a market unit for an agreed period of time (i.e. 1-3 years) post- practical completion, if an occupier that meets the above requirements cannot be found during a 6-month marketing period.</p>
<p>Wishes to attend Hearing Session</p>	
<p>Reason why</p>	
<p>Council Response</p>	<p>Policy LP38 provides two options for the provision of affordable and/or managed workspaces, both of which are considered to fulfil the Council's objectives of providing workspace for start-up businesses, SMEs, and other users who through their operation require affordability features (e.g. cultural uses). An identified need for such premises is set out in the borough's Employment Land and Premises Study. For developments of less than 1,000 sqm, the expectation (as per LP38.A.1) is only that developments provide for a range of unit sizes, which is not considered to be onerous, ambiguous or ineffective. Indeed, it represents the position of the adopted Local Plan which has worked well in practice. The impact of delivering affordable workspace on the viability of a proposals which contains over 1000 sqm of economic floorspace is already accounted for within LP38.A.2. The amendment to remove LP38.A.1 as suggested within this representation would result in the new Local Plan delivering less affordable workspace than the existing framework, which is not consistent with the strategic ambitions of the Local Plan.</p> <p>It is agreed that it would add clarity to the Local Plan to set a timeframe for the provision of the period for which the affordable workspace should be provided, as this help to clarify in instances where a financial contribution is made. A term of thirty years as proposed in the representation is considered appropriate.</p> <p>The provision of the affordable or open workspace must be agreed with the Council through an Affordable Workspace Management Plan, which is secured by s106. As set out in the Planning Obligations SPD, the Council's Economic Development Office will work with the developer to agree appropriate arrangements to ensure that the affordable workspace provision or features are met, including through the nominations of operators. There is considered to be little risk that affordable workspace will remain unlet, however if for any reason on site provision is not achievable, the Planning Obligations SPD sets out a mechanism for a contribution in lieu of this provision.</p>
<p>Proposed Change</p>	<p>Amend LP38.A as follows:</p> <p>"All development that provides economic floorspace will be expected to contribute to the provision of affordable and/or open workspace, in perpetuity <u>or for a minimum of 30 years</u>, which will be secured..."</p> <p>Amend LP38.A.2.b as follows:</p> <p>"Provide a proportion of economic floorspace at an affordable rent and with layouts, operations and services which support the provisions in part B below, in perpetuity <u>or for a minimum of 30 years</u>, as follows:"</p> <p>Amend LP38.A.3 as follows:</p>

	<p>"The redevelopment of existing affordable and open workspace must re-provide the maximum viable quantity of such economic floorspace in perpetuity <i>or for a minimum of 30 years</i>, at equivalent rents (taking into account..."</p> <p>Amend paragraph 18.69 as follows:</p> <p>"If the development does not propose providing open workspace with sufficient affordability features, a proportion of floorspace will alternatively be secured at an affordable rent in perpetuity <i>or for a minimum of 30 years</i>, subject to scheme viability..."</p>
Consultee Full Name	London Square and Sainsbury
Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	577
Title	LP42 Development in Centres
Number	Policy 53
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 19 Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres</p> <p>LP 42 Development in Centres</p> <p>London Square and Sainsbury's welcome and support the acceptability of residential uses in designated centres as set out at Policy LP42(D) where it comprises high-density, mixed-use development.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	London Square and Sainsbury

Consultee Organisation Details	
Agent Full Name	Ben Ford
Agent Organisation Details	Director Quod
Comment ID	578
Title	LP51 Parking, Servicing and Car Free Development
Number	Policy 62
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Chapter 20 Sustainable Transport</p> <p>LP51 Parking, Servicing and Car Free Development</p> <p>London Square and Sainsbury's welcome the support in principle for the redevelopment of existing car parks for alternative uses where it can be shown that the provision of car parking can be met now and in the future. This position accords with London Plan Policy H1.</p> <p>We strongly encourage the Council to build flexibility into Policy LP51 to reflect the wording of London Plan paragraph G of Policy T6.3 which states that Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in: 1) A diversion of demand from town centres to out of town centres, undermining the town centres first approach. And 2) A significant reduction in the viability of mixed-use redevelopment proposals in town centre.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. LP51 Parking, Servicing and Car Free Development A (3) sets out where the Local Plan will allow for flexibility with regards parking and this is considered in line with the London Plan.
Proposed Change	No change considered necessary.
Consultee Full Name	TR Property Investment Trust PLC
Consultee Organisation Details	TR Property Investment Trust PLC
Agent Full Name	Mr Chris Brown

Agent Organisation Details	Rolfe Judd Ltd
Comment ID	579
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>London Borough of Wandsworth Local Plan; Publication (Regulation 19) Version Consultation (January 2022)</p> <p>We write on behalf of our client TR Property Investment Trust Plc (TRPIT), to make representations on the London Borough of Wandsworth Draft Local Plan (Reg 19 version) which is out for consultation. These representations are written with specific reference to the following site:</p> <ul style="list-style-type: none"> - Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW <p>Proposed Area for Review</p> <p>A number of key changes are sought to the Draft Local Plan which affect the Ferrier Street Industrial Estate site. These changes are summarised below:</p> <ul style="list-style-type: none"> • Site Allocation WT8 and Policy PM2; • Appendix 2 of the Draft Proposed Local Plan • Policy LP4 Tall and Mid-Rise Buildings <p>Each of these matters are addressed in more detail in the following sections.</p> <p>Summary and Recommendations</p> <p>In conclusion, our client welcomes their site being included within the Ferrier Street Key Cluster and the list of allocated sites. The majority of development aims within the allocations broadly align with our planning permission which is welcomed, however much greater consideration needs to be given to the site's ability to provide additional tall and mid-rise buildings in appropriate locations within the site's boundary, including acknowledgement of the 10 storey building and the associated mid-rise buildings which were approved at committee in November 2019 – these appear to have been overlooked in this instance.</p> <p>We make the following recommendations:</p>

	<ul style="list-style-type: none"> - Recognise the Ferrier Street Industrial Estate as being an appropriate location for Tall and Mid-rise buildings through allocation within TB-G1d-03 and a new mid-rise allocation; - Incorporate flexibility within policy LP4 to allow for building heights to differ from the 'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B. We therefore recommend the policy is updated to reflect the wording of the new London Plan and the clarifications following its implementation; - Recognise the significant financial constraints the redevelopment of this former industrial site will incur, which will result in significant densities for the site allocation area to come forward and deliver the public benefits. <p>We would welcome the opportunity to meet with the Wandsworth Policy team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework. Any future Local Plan should recognise the scale of development, and the mix of uses already established through the extant planning permission for the site.</p> <p>We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	TR Property Investment Trust PLC
Consultee Organisation Details	TR Property Investment Trust PLC
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	580
Title	WT8 FERRIER STREET INDUSTRIAL ESTATE, FERRIER STREET, SW18 (1.90ha)
Number	Statement 8
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>- Ferrier Street Industrial Estate, Ferrier Street, London SW18 1SW</p> <p>Our client acknowledges that their site falls within the proposed Area Strategy for Wandsworth Town which will be managed through the introduction of proposed Policy PM2 (Wandsworth Town, Place Based Policy). Policy PM2(B) highlights six 'key clusters' which include Ferrier Street (Cluster E). The Industrial estate itself is also an allocated site (WT8) within the Wandsworth Town Growth Location. The Draft Local Plan Policy LP4 has also identified several areas in which are suitable for Tall and Mid-rise buildings. The Ferrier Street site is notably absent from these designations and our client seeks to amend the designation to ensure its inclusion.</p> <p>We have made individual comments on the specific policies using the Council's consultation portal, however, given the scope of the comments we also set out our principal representations below.</p> <p>The Site</p> <p>The Ferrier Street Industrial Estate is located within Wandsworth, close to Wandsworth Town Station (see enclosed site ownership and location plan). Ferrier Street comprises 16 x two storey small business units with limited servicing/parking providing circa 800sqm per unit. There is a wide range of existing tenants including catering businesses, tool hire, and motorcycle hire. Whilst the units (on the whole) are in reasonable state of repair, the accommodation is becoming outmoded and is in need of upgrading to better reflect tenant requirements and modern business needs. Furthermore, the existing tenants have expressed that they would prefer improved employment space with more adaptable floorspace with improved access and services arrangements.</p> <p>The site has been subject to a full planning application for the following works:</p> <p><i>'Demolition of existing buildings and construction of mixed use development ranging from 4 to 10 storeys to provide 5826sqm light industrial (Class B1c) use, 5078sqm flexible business (Class B1) use, 106 residential units (Class C3) use and 213sqm retail use (Class A1/A3). Associated public realm works including on-site playspace, enlargement of the station square and alterations to the Ferrier Street ground floor retail frontage of 332 Old York Road'</i></p>

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

Representation on the Draft Local Plan Document

Site Allocation WT8 and Policy PM2

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

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

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

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

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

'In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-G1d-03. The maximum appropriate height range for the zone is 7 to 15 storeys, and the maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2,

which set out the identified maximum appropriate heights in line with Policy LP4.

Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings)'.

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

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

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

	<p>Further to the representations made on the Regulation 18 version of the plan, it is very disappointing that the eastern corner of the site allocation has not been explicitly recognised as a location for a taller element, despite a 10 storey building being approved next to the station within our client's planning application (2018/5669). The height of the building was fully justified by the Townscape and Visual Impact Assessment (TVIA) and associated Tall Buildings Assessment, which the Council's officers and committee members ratified in their recommendations.</p> <p>The committee report associated with the planning application confirmed that the impact of a building of 10 storeys in this location on the corner of Ferrier Street and Old York Road would create less than substantial harm on the Old York Road Conservation Area and other heritage assets including the Alma.</p> <p>The building was also assessed against part d. of policy IS3 and DMS4 of the current local plan and the officer concluded:</p> <p><i>'the proposed development would result in the redevelopment of the site in accordance with the requirements of the site allocation bringing forward a substantial employment offer with managed workspace, a high level of affordable housing and a number of public realm improvements which are considered substantial public benefits in accordance with the requirements of the relevant tall building policies, IS3 and DMS4'</i></p> <p>Our client would like to ensure that the acceptability of this taller element on the eastern corner of the site is acceptable in principle. This has been firmly established through the planning application process and signed off by planning, design and conservation officers, as well as members of the planning committee so the inclusion of this principle is not considered to be controversial.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The approach to building height in this area is considered sound. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'restore' area as per the characterisation assessment of the UDS. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p> <p>Tall or mid-rise building zones are not considered appropriate for in the majority of the WT8 due to the proximity of historic character of the buildings fronting Old York Road and the setting of the Old York Road Conservation Area to the south plus the consideration of the residential amenity of these properties, with any taller development located towards the northern edges and the tall building zone to the north west of the site allocation.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	TR Property Investment Trust PLC
Consultee Organisation Details	TR Property Investment Trust PLC
Agent Full Name	Mr Chris

	Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	581
Title	Tall Building Zone TB-G1d-03
Number	Map 23.28
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Appendix 2 of the Draft Proposed Local Plan</p> <p>The Regulation 18 version of Site Allocation WT8 recognised that the site has been acknowledged as an area which has 'opportunities for tall buildings' within the Urban Design Study (2020) and Appendix 2 of the emerging Local Plan (Reg18). However, the Regulation 19 version of the plan only recognises the north west corner as being suitable for Tall Buildings. The tall building designation (TB-G1d-03) appears to cover half of Unit 4 which is within our clients ownership but no 'mid-rise' designation is given at all for the properties within the designation.</p> <p>As set out in the emerging policy wording of LP4, it is suggested that any site outside of this designation would be an inappropriate location for a tall or mid-rise buildings. As the site currently has planning permission for tall and mid-rise buildings (ranging from 3-10 storeys), it is inherently an appropriate location for height which has been tested through the planning application process. The approved development makes a clear justification for height within the existing local context, which the London Borough of Wandsworth has approved as an appropriate site response. Whilst the sensitivities of the surrounding area are acknowledged, the principle for height has already been established on the site, therefore the policy should recognise height in this location as part of the future local context height.</p> <p>We therefore implore the Council to recognise the site as having opportunities for tall building within a local context. Appendix 2 should ensure that the 10 storey element to the east of the WT8 is located within the TB-G1d-03 tall buildings designation and that a mid-rise designation is afforded to the remainder of buildings within the Ferrier Street Industrial Estate.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The approach to tall and mid-rise building heights and zones, is considered to be consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance.
Proposed Change	No change required.

Consultee Full Name	TR Property Investment Trust PLC
Consultee Organisation Details	TR Property Investment Trust PLC
Agent Full Name	Mr Chris Brown
Agent Organisation Details	Rolfe Judd Ltd
Comment ID	582
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	No
Soundness - Sound?	Yes
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><u>Policy LP4 Tall and Mid-Rise Buildings</u></p> <p>Site Allocation WT8 states that all proposals for tall buildings will be assessed under emerging local plan policy LP4; this is also reiterated in Part 5 of Policy PM2.</p> <p>The policy defines a 'tall building' as:</p> <p><i>'Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings'.</i></p> <p>The policy defines a 'mid-rise building' as:</p> <p><i>'Buildings which do not fall within the definition of a tall building as set out in Part A, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings'</i></p> <p>The proposed tall building policy and Appendix 2 identify areas within the Borough where tall and mid-rise buildings are considered acceptable but places a blanket restriction allocation for the rest of the Borough.</p> <p>This blanket allocation does not consider the nature or appearance of certain areas within the Borough that already have tall buildings. Neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zone.</p> <p>The Policy specifically states that proposals for tall buildings will only be appropriate in identified zones and they will be assessed against the criteria set out in Part B. Part D states that buildings should not exceed the appropriate height range identified for each of the tall building zones.</p>

	<p>The tall building map has been based on an Urban Design Study (2021) which is a high-level assessment to identify suitable locations for tall buildings in the borough. Part C of the policy restricts any tall buildings outside of these zones, even where they demonstrate they meet the tall building criteria set out in Part B. Part D also restricts tall buildings to the 'appropriate height range' identified for each tall building zone, even if the site demonstrates they meet the criteria set by Part B.</p> <p>It is considered that the policy is unduly restrictive and should not restrict building heights where it can be demonstrated they meet the requirements of Part B of the same policy. This approach does not accord with the new London Plan.</p> <p>We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D).</p> <p>The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate.</p> <p>The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C.</p> <p>We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.</p>
Change(s) considered necessary	We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA).</p> <p>The approach to tall and mid-rise building heights and zones, including the approach of not permitting proposals for tall or mid-rise building outside of these zones, is considered to be consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The Council considers that the Master Brewer judicial review Case should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Peabody and Mount Anvil
Consultee Organisation Details	
Agent Full Name	Miss Ailish

	Collins
Agent Organisation Details	Planning Consultant Roife Judd Planning
Comment ID	583
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Local Plan (Regulation 19) Publication Version - Public Consultation Representations made on behalf of Peabody and Mount Anvil</p> <p>We write on behalf of Peabody and Mount Anvil to make representations on the London Borough of Wandsworth's Local Plan (Regulation 19 publication version) which is currently out for public consultation. These representations relate to the Peabody Estate, SW11 1UR. Refer to the Site Location Plan at Appendix 1 of this letter.</p> <p>Our clients welcome the opportunity to work collaboratively with LB Wandsworth to formulate a new Local Plan for the Borough. In particular, our clients are keen to promote a positive planning policy framework for the mixed-use regeneration of the estate which delivers significant social, cultural and environmental benefits for the local area. A review of the draft Local Plan policies as they relate to the site is therefore essential to ensure the development potential of the site is recognised and secured.</p> <p>This representation principally relates to:</p> <ul style="list-style-type: none"> • Tall Buildings Zone • Policy LP4: Tall and Mid-rise buildings • Site Allocation CJ6: Peabody Estate, St John's Hill • Town Centre Boundary <p>Proposed Area for Review</p> <p>As set out above, a number of changes are sought to the Local Plan Regulation 19 version as it relates to the 'Peabody Estate' site. These changes are summarised below:</p> <ul style="list-style-type: none"> • Remove reference to the height range of "21-36m" above ground level from Appendix 2 Tall Building Zone TB-B5-02; • Amend Policy LP4 wording to allow greater flexibility for building heights to differ from the 'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B; • Amend the reference "retail units" in Site Allocation CJ6 to "commercial units" to reflect the range and flexibility of uses permitted through the extant planning permission 2017/5837;

	<ul style="list-style-type: none"> Remove reference to "maximum" building height in Site Allocation CJ6. <p>Summary</p> <p>We would welcome the opportunity to meet with the Wandsworth Policy team to review the matters raised above and collectively work towards the formulation of a positive planning policy framework. Any future Local Plan should recognise the scale of development, and the mix of uses already established through the extant planning permission for the site.</p> <p>We trust the above will be taken into consideration during the Consultations. Should you have any questions, please do not hesitate to contact the undersigned.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary

Consultee Full Name	Peabody and Mount Anvil
Consultee Organisation Details	
Agent Full Name	Miss Ailish Collins
Agent Organisation Details	Planning Consultant Rolfe Judd Planning
Comment ID	584
Title	CJ6 Peabody Estate, St John's Hill
Number	Statement 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>The Site and Background</p> <p>The Peabody Estate covers approximately 2.3 hectares and is bounded by St John's Hill to the north, Strath Terrace and Bouflower Road to the southwest, Comyn Road to the southeast, Eckstein Road to the east and railway lines to the north-west. The site is positioned opposite the Brighton Yard entrance to Clapham Junction railway station.</p> <p>The site currently benefits from an extant planning permission approved in January 2019 (LPA ref: 2017/5837). Overall, the development scheme involves the demolition of all existing buildings, and the construction of five new buildings up to 12 storeys in height, providing a total of 599 residential units (284 private and 315 affordable units), 530 sqm of community space, and 569 sqm of commercial space, with ancillary car parking, cycle parking and open space.</p> <p>Delivery of the scheme has been split into three phases of development. Phase 1 of the development, delivering 153 units, is complete and occupied. Phase 2 of the development, delivering 198 units, is currently under construction, and Phase 3 of the development has planning permission for 248 units.</p> <p>Peabody own and manage the Peabody Estate, and have brought Mount Anvil on as a joint venture partner to help deliver the third and final phase of the development. A planning application has been submitted to LB Wandsworth for minor material amendments to the scheme (reference: 2021/5678) which is currently being determined by officers.</p> <p><i>Current Planning Policy Designations</i></p> <ul style="list-style-type: none"> • Clapham Junction Town Centre • Site Specific Allocation 64 (Peabody Estate) which supports residential use with a small amount of town centre use along the St John's Hill frontage • Decentralised Energy Opportunity Area

Representations on the draft Local Plan Publication Version

Under the currently adopted local plan, the Peabody Estate is identified as providing an opportunity to deliver a modern residential development to meet housing needs, and to provide mixed use development along the St John's Hill frontage to integrate the site within the wider town centre. This policy direction for the site was supported by the site specific allocation, as well as the inclusion of the northern part of the site within the town centre boundary.

Although planning permission has already been approved to deliver high density residential development with supporting commercial and community uses on the site, construction of Phase 3 has not yet started (Phase 2 currently under construction), which is due to deliver a number of significant benefits for the site. It is therefore important for our client that the policy direction set out in the Local Plan continues to support the undeveloped part of the site as an appropriate location for mixed use development and tall buildings, given the existing planning permission.

Site Specific Allocation

The site has been given the Site Allocation CJ6 "Peabody Estate, St John's Hill". Peabody and Mount Anvil are supportive of the re-inclusion of this site allocation in the Local Plan Publication Version and are committed to continue working with the Council to deliver the overall aims for the allocation.

Land Use

Peabody and Mount Anvil support the site allocation requiring a mix of residential units as part of a higher density development to the north of the site, with mixed-use development fronting St John's Hill frontage. This is consistent with the current Site Specific Allocation 64 under the adopted Local Plan.

The allocation does however refer to "retail units" anticipated at ground floor, which does not provide the flexibility envisaged for these spaces to respond to the needs of the community and is not consistent with the range of uses permitted by the extant permission (including former Use Classes

A 1-5 and B 1). It is sought that this wording is amended to "commercial units".

Building Heights

The allocation makes reference to the site's location within the tall building zone TB-B5-02 which is supported, as set out above. The allocation does however state that the *maximum* appropriate height range for the zone is 7 to 12 storeys (21-36m), and that the height of developments within the zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2.

The tall building maps in Appendix 2 set out an appropriate range of building heights for the site, with no explicit mention of 'maximum' building heights. Whilst it is appropriate for policy to establish a suitable height range for the zone, this should not be an absolute maximum as this allows very little flexibility for a design-led contextual response to site development, and buildings higher than the

'appropriate height range' should not automatically be considered inappropriate.

For the same reasons set out in the analysis of the 'Tall Building' policy and designation above, we recommend that the wording of the allocation is amended to remove reference to maximum building heights.

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings. The height parameters of the tall and mi-rise building zones have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>It is agreed that reference within paragraph 6.74 to 'retail units' should be amended to apply to those covered by the consented scheme. For consistency with the site allocation itself (set out in paragraph 6.73), this should refer to 'town centre uses' instead.</p>
Proposed Change	<p>Amend paragraph 6.74 as follows:</p> <p>"...The street block fronting on to St John's Hill should include a mixed-use development with individual retail<u>town centre uses in the</u> units to<u>on the</u> ground floor."</p>
Consultee Full Name	Peabody and Mount Anvil
Consultee Organisation Details	
Agent Full Name	Miss Ailish Collins
Agent Organisation Details	Planning Consultant Rolfe Judd Planning
Comment ID	585
Title	Battersea Tall Building Zone
Number	Map 23.3
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Tall Buildings</p> <p><i>Tall Building Zone</i></p> <p>The northern part of the site (comprising Phases 2 and 3) has been included in the Tall Building Zone</p>

	<p>TB-B5-02 which sets an appropriate height of 7-12 storeys (21-36m).</p> <p>Peabody and Mount Anvil support inclusion of the site within the Tall Building Zone as the site is characteristically suitable for tall buildings due to its highly sustainable and accessible location, its position on a strategic route and within the Clapham Junction Town Centre.</p> <p>Appendix 2 sets out an 'appropriate height' by number of storeys and in metres above ground level. For the subject site, the height in metres is very specific and does not allow for any flexibility for the height to exceed this, even if complying with the number of storeys. For instance, the approved planning permission for the site (reference 2017/5837) includes a 12 storey building (Plot 7) which has a building parapet height of 38.9m, with roof plant to 41.1 m above ground level. The inclusion of both height ranges (no. of storeys and metres above ground level) is overly onerous and provides very little flexibility in the building design, particularly with regards to floor-to-floor heights, and the inclusion of plant and servicing, or lift overruns. Specification of the appropriate number of storeys is considered to be sufficient to guide development in these Tall Building Zones, which is consistent with the London Plan.</p> <p>We therefore seek for the appropriate height range of "21-36m" to be struck from Appendix 2 Tall Building Zone TB-B5-02.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>Paragraph 14.27 of the supporting text to LP4 states that 'the top of the building does not include structures and plant typically found at roof level, including railings, parapets, plant equipment, maintenance cranes or elevator shafts. The provision of such structures and plant will be assessed within the context of relevant criteria within this Policy.'</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Peabody and Mount Anvil
Consultee Organisation Details	
Agent Full Name	Miss Ailish Collins
Agent Organisation Details	Planning Consultant Rolfe Judd Planning
Comment ID	586
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP4: Tall and Mid-rise buildings</i></p> <p>Policy LP4 sets out the criteria for the appropriateness of tall buildings and Appendix 2 sets out the areas for which tall buildings are considered to be appropriate. The Policy specifically states that proposals for tall buildings will only be appropriate in identified zones and they will be assessed against the criteria set out in Part B.</p> <p>The tall building map has been based on an Urban Design Study (2021) which is a high-level assessment to identify suitable locations for tall buildings in the borough. Part C of the policy restricts any tall buildings outside of these zones, even where they demonstrate they meet the tall building criteria set out in Part B. Part D also restricts tall buildings to the 'appropriate height range' identified for each tall building zone, even if the site demonstrates they meet the criteria set by Part B.</p> <p>In undertaking the Urban Design study, the Council has not considered all of the matters which would normally be included in a tall building assessment of an individual site. Whilst policy should give clear guidance of appropriate heights (as set out in London Plan Policy D9), there does need to be sufficient flexibility to allow a proper assessment of a tall building, by virtue of a planning application.</p> <p>It is considered that the policy is unduly restrictive and should not restrict building heights where it can be demonstrated they meet the requirements of Part B of the same policy. The policy as currently drafted does not accord with the new London Plan, nor does it allow for sites to be tested through the planning process to determine whether a scheme is contextually appropriate.</p> <p>We refer to the recent High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) Part A requires London Boroughs to define all buildings within their local plans; Part B requires London Boroughs to identify within their local plans suitable locations for tall buildings, Part C identifies criteria against which the impacts of tall buildings should be assessed and Part D makes provision for public access.</p> <p>The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate.</p> <p>The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C.</p> <p>The approach to the criteria assessment of Local Plan Policy LP4 is broadly supportive, however, there must be flexibility within the policy to allow for building heights to differ from the 'appropriate height range' where they satisfactorily demonstrate they meet the criteria of Part B. We therefore recommend the policy is updated to reflect the wording of the new London Plan and the implementation of this wording is further clarified.</p> <p>We therefore strongly recommend that Wandsworth amend Policy LP4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA's interpretation of Policy D9.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The Council considers that the Master Brewer judicial review Case should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.</p> <p>In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Peabody and Mount Anvil
Consultee Organisation Details	
Agent Full Name	Miss Ailish Collins
Agent Organisation Details	Planning Consultant Rofe Judd Planning
Comment ID	587
Title	Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area
Number	6
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Town Centre Boundary</p> <p>The northern part of the site (comprising Phases 2 and 3) has been included in the Clapham Junction Town Centre boundary. Peabody and Mount Anvil are supportive of the re-inclusion of this site within the Town Centre boundary in the Publication Version of the plan as this was previously not included in the pre-publication version. The inclusion of the site within the Town Centre is supportive of the land use aspirations for the site as set out in Site Allocation CJ6, which envisaged a mix of town centre uses fronting St John's Hill.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Josephine Vos
Consultee Organisation Details	Transport for London
Agent Full Name	
Agent Organisation Details	
Comment ID	588
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Consultation on the Publication version of the Wandsworth Local Plan</p> <p>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.</p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on the publication version of the Wandsworth Local Plan. We welcome the positive changes that you have made to the Local Plan to take account of our response to the pre- publication (Reg. 18) version. This response provides an updated set of comments reflecting the changes made to the Local Plan.</p> <p>The London Plan was published in March 2021 and now forms part of Wandsworth's Development Plan. Local Plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> <p>In this context we welcome application of Placemaking, Smart Growth and People First principles in developing the Area Strategies, in particular, the need to manage traffic and provide good public transport connectivity, support active travel and work towards the 15-minute neighbourhood. We welcome added references to the Vision Zero road safety objective. However, as stated previously, the Plan should include policies and measures to ensure that all development contributes towards achieving the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan. The mode split target of 82 per cent of trips to be made by public transport or active travel by 2041 could be made more prominent by including it in policy LP49.</p>

We welcome clarification that car free residential development will be required in areas of PTAL 4 or above, although it would be helpful to confirm that this extends to all parts of the Clapham Junction and Vauxhall, Nine Elms and Battersea Opportunity Areas to ensure conformity with London Plan T6.1. The new paragraph, suggesting that there may be amended parking standards for key workers is not considered to be evidence-based, and is not consistent with London Plan parking policies so should be removed.

We welcome the strong emphasis on applying the Healthy Streets Approach and the positive approach to encouraging active travel. We also welcome strong policies on safeguarding and retaining transport land including specific sites and support for improved bus services and infrastructure including waiting facilities and stands.

Our comments on specific modifications and suggestions for amendments or wording improvements are detailed in appendix A below. Alongside our response to the Reg. 18 consultation, updates have been provided which take into account changes to the Reg. 19 version of the Local Plan.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Comment noted. The following is in response to TfL's comment in Appendix A of their representation.

The Regulation 19 Version of the Local Plan has been development to be in general conformity with the London Plan. The Council's detailed transport policies and proposals are set out in its statutory Third Local Implementation Plan (LIP) which align with the Mayor of London's Transport Strategy and should be read with the Local Plan as part of a holistic understanding of how the transport environment in Wandsworth will evolve. The Local Plan supports the Healthy Streets Approach and Vision Zero and makes reference to them in the Reg 19 draft of the Local Plan.

It is considered that the introduction to the Sustainable Transport chapter could reiterate the Mayor's modal share shift targets to ensure consistency with the rest of the Local Plan introduction chapters which establish goals where relevant.

The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.

The date of implementation of the Wandsworth Gyrotory project was not updated after the Regulation 18 Consultation due to an administrative error and it is proposed that it could be amended.

The Council does not consider there to be sufficient reason to remove the flexibility as to which road vehicular access and servicing comes onto the Gasholder Cluster from and considers that paragraph 4.40 should remain unchanged.

The completion date for the Northern Line extension was not updated after the Regulation 18 Consultation due to an administrative error and it is proposed that it could be amended.

The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.

The Battersea Bus Garage is characterised as an industrial zone and will be maintained and the existing uses explicitly protected in line with LP34 Managing Land for Industry and Distribution.

The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.

Site Allocation CJ5 Winstanley / York Road Regeneration Area is considered sound but to improve consistency and include all necessary information regarding public transport it is considered that an additional paragraph could be included to extrapolate on the development considerations for the site allocation.

Existing parking is not required to be removed from site allocation PUT1 Wereldhave site. LP51 Parking, Servicing and Car Free Development sets out the Council's position on parking. Site Allocations PUT2 /PUT 3/ PUT4 /PUT 5/ PUT6 do not set out any requirement for new or replacement car parking to be provided. Proposals for such development would need to be in conformity with the London Plan Policy T6L.

To remain consistent with Policy T6L of the London Plan the requirement for parking at site allocation TO3 could be removed.

Due to an administrative error this clause to PM7 C6 was removed and should be reinserted.

Car parking at site allocation BA1 Sainsbury's Car Park will be reduced as part of any redevelopment to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels.

Due to the low PTAL of RIV11 and OUT4 the existing wording regarding parking is considered sufficient for both allocations and in conformity with London Plan Policy T6L.

To ensure consistency with the other site allocation with healthcare uses, OUT3 and OUT5 could include reference to the inclusion of parking.

To ensure consistency with the other site allocation with healthcare uses, OUT3 could include reference to the inclusion of parking.

Policy LP7 (D) encourages replacement of parking and garages where these are no longer required. No further clarification is deemed necessary.

The Local Plan is to be read holistically and reference to the benefits to air quality of reduced car use is set out in LP49 Sustainable Transport.

It is considered that the introduction to the Sustainable Transport chapter could reiterate the Mayor's modal share shift targets to ensure consistency with the rest of the Local Plan introduction chapters which establish goals where relevant.

LP51 A2 does require that development proposals demonstrate "that parking on site is the minimum necessary" which is considered sufficient.

LP51 A2 refers to policy LP1 the Design-Led Approach as it sets out guidance for how developments should incorporate off street parking within a design-led approach where necessary.

The Council acknowledge that the provision of parking spaces for key workers is an important issue. The wording of paragraph 20.36 is proposed to be amended to clarify the Council's position in support of key worker parking provision. Parking permits for key workers was a temporary measure during the lockdown, and there is no current priority provision for key workers within CPZ.

The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.

It is considered that LP51 could clarify that parts D and E are for residential car parking and an amendment could be made to clarify this.

LP51 Parking, Servicing and Car Free Development A (8) sets out that office parking should follow the London Plan which requires it to be car-free. This does not need to be duplicated in the supporting text.

LP52 is considered sound but greater clarity could be added to ensure that the removal of the Wandsworth Gyrotory is recognised as the particular highway improvement scheme the Council aims to support. There have also been several administrative errors which led to the deletion of two paragraphs (A2 and A3) from LP52 which it is considered could be reinserted as minor amendments. This could also necessitate a small reshuffling of paragraphs to ensure it reads coherently.

LP52 A (1) is considered sound but it could be clarified that TfL are a specific stakeholders who should be contacted.

Proposed Change

Amend wording in paragraph 20.7 as follows:
 '20.7 Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. They will need to demonstrate how they are helping achieve the LIP and Mayoral target of a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041.'

Amend wording in paragraph 4.19 as follows:
 '4.19 ... This recognises that parts of these properties will be required to implement the TfL scheme – programmed to be implemented by 2025~~4~~ - and will be acquired by TfL.'

Amend wording in paragraph 5.3 as follows:
 '5.3 ...The VNEB OA has been the focus for considerable new development since the adoption of the OAPF in 2012, and this is expected to continue with an intense construction period in the years immediately following the opening of the Northern Line Extension in Autumn 2021.'

Amend wording in paragraph 5.74 as follows:

5.74 Active Travel - Contributions to upgrade pedestrian routes to/from Battersea Park Station and Queenstown Road Station and improve accessibility to the new Northern Line station at Battersea Power Station, currently expected to open in Autumn 2021 will be required.

Include after paragraph 6.64 a new paragraph as follows:

'Public Transport - Development may need to improve York Road in terms of public transport as well as provide and maintain facilities for sustainable travel include bus standing and turning on site.'

Amend paragraph 8.34 and 8.35 as follows:

8.34 Access – The parking and access to the west should be redeveloped retained with public realm enhancements provided for pedestrians.

8.35 Parking – Servicing should take place directly from the Garratt Lane frontage subject to the constraints of the bus bays:

Amend wording to policy PM7 Roehampton and Alton Estate Regeneration Area C (6) as follows:

'6. Measures to improve public transport facilities by relocating existing bus stops in lay-bys along Danebury Avenue into the carriageway, and by creating additional bus stops will be supported.'

Include after paragraph 13.14 a new paragraph as follows:

'Parking - Measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.'

Amend wording in paragraph 13.28 as follows:

13.28 Development, including residential use with the re-provision of parking and expansion of healthcare facilities and parking

Include after map 13.5 new paragraphs as follows:

'Development Consideration

'Parking - Measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.'

Amend wording in paragraph 20.7 as follows:

'20.7 Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. They will need to demonstrate how they are helping achieve the LIP and Mayoral target of a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041.'

Amend wording in paragraph 20.36 as follows:

20.36 The Council supports the provision of car parking spaces for key workers within new developments. The Mayor of London is currently producing a list of key workers which Wandsworth will use to provide guidance on the distribution of car parking spaces that are created for key workers. Additionally, Car Parking Zone policies will be amended to allow key workers who require use of a vehicle greater access to parking permits. Within the parameters of Policy LP51 and where parking is to be provided at new housing developments, the Council will support the provision of car parking spaces for key workers. The Mayor of London has produced a list of key workers (contained within the Housing Policy Practice Note, 'Allocating intermediate homes to London's key workers', December 2021), and this will provide a basis for the definition of key workers.

The Council's priority is to help those key workers on lower incomes, with a place of work away from their own home, to travel to work where public transport options are more limited. This support, therefore, is more likely to be appropriate where developments are providing affordable housing in locations with poor PTAL ratings.

Amend wording in policy LP51 as follows:

'D. Car-free residential development will be required where:

...

- 1 Low car residential development will be required where:'

Amend wording in policy LP52 as follows:

'A. The Council will promote major transport infrastructure schemes including Crossrail 2, Clapham Junction expansion, the Northern Line Extension to Battersea, improved rail links between South London and Heathrow, suburban rail services, ~~highway improvement schemes~~ the removal of the Wandsworth Gyrotory and new pedestrian and cyclist bridges to be delivered by other parties including Government, TfL, public transport companies and private developers.'

Include wording in policy LP52 after part A(1)(c) as follows:

- 1 Land will be safeguarded for future transport functions where necessary. New and additional land for transport functions and infrastructure will be sought to address deficiencies in provision and/or to accommodate expected future demand. Financial contributions to public transport improvements and other transport infrastructure can be made in lieu of provision in special circumstance.
- 2 The Thames and Wandle riversides will be protected as they are key routes for walking and cycling in Wandsworth but also important natural resources. It will be expected of development on riverside routes that:
- 3 Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)) and:
- 4 provision is made for riverside walks and access at least six metres wide (Thames) or at least three metres wide (Wandle), and appropriate to the scale of development, along the entire river frontage except for safety, operational or nature conservation reasons;
- 5 any new accesses linking the riverside walk to the surrounding area are at least three metres wide;
- 6 riverside walks should where possible allow for provision of cycling, ensuring pedestrian safety; and
- 7 the Environment Agency has been consulted for all developments adjacent to a watercourse.
- 8 Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)).

Amend wording in policy LP52 A(1)(c) as follows

'consultation has been undertaken with operators, owners and stakeholders including TfL.'

Consultee Full Name	Zach Croft
Consultee Organisation Details	Development Planner Network Rail
Agent Full Name	
Agent Organisation Details	
Comment ID	589
Title	Area Strategy for Nine Elms
Number	5
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No

If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><u>Local Plan Review, Consultation on the Publication Draft Local Plan – Land at Stewarts Lane</u></p> <p>These representations focus on <i>Section 5 Area Strategy for Nine Elms</i> and are in addition to those provided by Network Rail (NR) in relation to Clapham Junction.</p> <p>As shown by the green area in the image below, NR has significant land ownership around Stewarts Lane within Wandsworth borough. There are currently several uses within this location including: Abellio bus depot, London Concrete facility, tarmac facility, Stewarts Lane train depot, commercial uses within railway arches to name a few. These uses are intertwined by a series of railway lines.</p> <p>The site is within the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area; is designated as Strategic Industrial Land (SIL); and the western part of the site is within the Battersea Design and Technology Quarter (BDTQ) shown by the red line area.</p> <p>Overall NR find this section of the draft plan to be sound and legally compliant. Thank you for the opportunity to provide representations, please contact NR on the contact details below if there are any questions.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Zach Croft
Consultee Organisation Details	Development Planner Network Rail
Agent Full Name	
Agent Organisation Details	
Comment ID	590
Title	PM3 Nine Elms
Number	Policy 4

Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><u>Draft Policy PM3 Nine Elms</u></p> <p>The draft plan identifies the opportunity to transform part of Queenstown Road, Battersea SIL into the BDTQ to build on the existing creative economy to support the intensification of the existing industrial capacity by attracting a cluster of start-ups and micro-businesses in the creative, tech and digital sectors. Part B.6 draft <i>Policy PM3 Nine Elms</i> requires the following from proposals within BDTQ:</p> <ul style="list-style-type: none"> • Must not adversely impact industrial operations and businesses within the Queenstown Road, Battersea SIL. • Should have reference to the BDTQ EADF. • Must deliver intensified industrial floorspace as part of any mixed-use scheme, including provision for industrial uses on the ground floor. • Must provide affordable workspace in line with the requirements of Policy LP38 (Affordable and Open Workspace). • Must support the objectives of the Cultural Strategy for Battersea and Nine Elms. <p>Furthermore, Part A.2 of the policy sets out that development proposals are recommended to deliver and/or fund placemaking improvements to create enhanced public realm which could include the provision of amenity yards and working yards; enhanced public realm in tunnels and underpasses; improvements to walking and cycling access; and the introduction of signage and wayfinding features.</p> <p>Part B.7 supports the economic function of SIL in the area and states that the council will support proposals which enhance, re-provide and/or intensify the industrial provision. It goes further to set out that in the Stewart's Road Industrial Estate, proposals should seek to directly, or via funding, improve the condition of the road within the industrial area; the condition of Stewart's Road bridge; and deliver the proposed walking and cycling underpass to connect the area to the power station.</p> <p>NR Supports the core principles of the BDTQ designation:</p> <ul style="list-style-type: none"> • Intensification of industrial uses whilst not adversely impacting existing operations and businesses within the SIL. • Public realm improvements. • Better connectivity. <p>In addition to this, proposals should not have a negative impact on the operations of the railway in this area.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)

Reason why	
Council Response	Support noted. Proposals within this area - and elsewhere in the borough - would be expected to not have a negative impact on the operations of railways or other forms of transit. This is covered, in part, by Policy LP50 Transport and Development, through the requirements of Transport Assessments.
Proposed Change	No change considered necessary.
Consultee Full Name	Zach Croft
Consultee Organisation Details	Development Planner Network Rail
Agent Full Name	
Agent Organisation Details	
Comment ID	591
Title	NE6 Havelock Terrace, SW8
Number	Statement 30
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><u>Site Allocations NE6 Havelock Terrace, NE7 Ingate Place and NE8 Silverthorne Road</u></p> <p>These three site allocations are identified as the BDTQ Cluster (as shown in Figure 2). The majority of NE6 and NE7 are adjacent to NR land and a large part of site NE8 is within NR ownership. A summary of the site allocations is now set out:</p> <ul style="list-style-type: none"> • Proposed for a mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space. • Industrial uses must be provided within ground floor units, with the opportunity for industrial and office uses on upper floors. • Existing B2 industrial uses (such as the Tarmac and London Concrete sites) and the bus depot must be retained and protected, including their re-provision within the SIL to provide a more efficient use of the site. • With exception to Palmerston Court within NE6, which is outside of the SIL, residential uses are not permitted in any areas of NE6, NE7 and NE8. • High-quality public realm. • Active frontages promoted across NE6, NE7 and NE8. • Improved accessibility and connections across the cluster.

	NR supports the allocations of these sites for industrial development along with the principles for active frontages, improved public realm, and positioning industrial uses at ground level with the possibility of office uses above. The retention of the uses highlighted above, along with the other existing uses are of importance. Further to the points above NR would emphasise that any proposals should not conflict with the existing uses or the operation of the railway.
Change(s) considered necessary	
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	
Council Response	Support noted. Proposals within this area - and elsewhere in the borough - would be expected to not conflict with the operations of railways or other forms of transit. This is covered, in part, by Policy LP50 Transport and Development, through the requirements of Transport Assessments.
Proposed Change	No change considered necessary.

Consultee Full Name	Zach Croft
Consultee Organisation Details	Development Planner Network Rail
Agent Full Name	
Agent Organisation Details	
Comment ID	592
Title	Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area
Number	6
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p><u>Local Plan Review, Consultation on the Publication Draft Local Plan – Land at Clapham Junction Station</u></p> <p>These representations focus on Section 6 of the draft local plan, <i>Area Strategy for Clapham Junction and York Road / Winstanley Regeneration Area</i> and follow on from representations made by Network Rail (NR) in March 2021 and July 2021. NR wishes to provide additional comments in relation to site allocation <i>CJ4 Land at Clapham Junction</i> as shown in Figure 1 as well as to the Clapham Junction area as a whole.</p> <p>This site is an independent development site from Clapham Junction Station itself that can be developed individually, however there is also the potential for the site to be brought forward along with works to the station as part of a long-term strategy for this strategic location. This is subject to further investigation by NR.</p> <p>Summary</p> <p>In summary NR welcomes the greater emphasis placed on the Opportunity Area designation within the draft local plan which includes site CJ4 as well as the emphasis within the plan of the need for a master-planning exercise to provide a strategy for achieving the growth targets of the Opportunity Area. However, we would request that the approach taken to tall buildings in this location is revisited.</p> <p>NR has already undertaken engagement with DTZIM in relation to <i>Site Allocation CJ2 Clapham Junction and Station Approach</i> and will continue to do so along with other key stakeholders to facilitate the master-planning process of Clapham Junction.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.
Proposed Change	No change considered necessary.
Consultee Full Name	Zach Croft
Consultee Organisation Details	Development Planner Network Rail
Agent Full Name	
Agent Organisation Details	
Comment ID	593
Title	PM 4 Clapham Junction and York Road/ Winstanley Regeneration Area
Number	Policy 5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Section 6 – Area Strategy for Clapham Junction and York Road / Winstanley Regeneration Area</p> <p>The draft local plan provides a boundary for the Clapham Junction opportunity Area which identifies the areas with the greatest potential of change over the plan period. NR supports the inclusion of this site within the Opportunity Area boundary and having the potential for significant growth.</p> <p>Part A. 3 of the emerging Policy PM4 <i>Clapham Junction and York Road / Winstanley Regeneration Area</i> states that the Council will work in collaboration with NR, TfL, the local community, and other stakeholders to prepare an Urban Heart Masterplan for Clapham Junction, comprising the station and adjoining site allocations to improve the public transport interchange and unlock capacity for new homes and jobs. We welcome the opportunity for site CJ4 to be included within this area and NR has already begun to engage with the Council and other key stakeholders to discuss the preparation of the masterplan.</p> <p>Part A. 9 of emerging Policy PM4 states:</p>

“Development must be sensitive to local character by maintaining and respecting the proportions, scale and coherence of existing terraced streets, shop frontages and listed buildings and their settings.”

This wording has the potential to overly constrain new development which should be encouraged to seek to optimise the use of previously developed land and find appropriate ways of responding to the existing character of the area. This could be reworded as follows:

“Development must be sensitive to local character by having regard to and being respectful of the proportions, scale and coherence of existing terraced streets, shop frontages and listed buildings and their settings.”

NR supports site allocation *CJ4 Land at Clapham Junction Station*. Paragraph 6.53 of the draft plan refers to the site comprising a site area of 3.07ha as shown in Figure 1. However, we refer to our representations dated 23rd July 2021 that requests a larger site area be included for this site allocation. NR consider that the site boundary should be extended to the north to include the railway sidings, as shown by the comparison in Figure 2, to maximise the development potential of the site and provide maximum benefits.

Figure 2: Existing and Proposed Site Allocation Boundary (left and right respectively)

The site is in tall buildings zone TB-B5a-01 that supports a maximum appropriate height range for the zone as 7 to 15 storeys (21-45m). Draft *Policy LP4 Tall and Mid-rise Buildings* states in part D:

“Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of the tall buildings will be required to step down towards the edges of the indicated in the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.”

We are of the view that this approach remains an overly prescriptive approach to tall buildings. This approach could harm the plan from meeting its objectives for the Opportunity Area as it fails to recognise that to meet the desired growth targets there will be a need to provide buildings that are taller than the existing context. The location of high-density development should consider social and economic reasons alongside design considerations. Judgements should be made to the acceptability of tall buildings and high-density development based on a range of factors, rather than just townscape considerations.

Specifically, for site CJ4, the site constraints set out in more detail below will require a decked development which has a knock-on effect in terms of financial viability. A financially viable development of the site will likely require tall buildings over 15 storeys in height.

There is a need to retain in the future the existing rail and operational uses that are currently on this depot and sidings site. Consequently, any development would only be possible by decking over the depot and sidings, allowing them to remain operational. NR is investigating how the site could be developed in the future whilst maintaining the depot and sidings beneath. The construction costs of such decked development are likely to be considerable and therefore its financial viability is likely to be very challenging. NR believe that the council should take this into account when considering affordable housing provision and what massing and quantum of development is considered appropriate on the site.

Furthermore, if the development of the depot and sidings was to come forward along with infrastructure works at the station, as a part of a long-term strategy. NR believe that the costs of these infrastructure works should also be taken into account when considering affordable housing provision and what massing and quantum of development is considered appropriate on site.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. PM4 A (9) is considered sufficiently flexible to allow for development to come forward while maintaining the local character of Clapham Junction.

	<p>It is considered that the current boundary for site allocation CJ4 is suitably sustainable and the proposed extension may detract from this.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	595
Title	PM10 Wandle Valley
Number	Policy 11
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	<p>Area Strategy – Wandle Valley</p> <p>15. We welcome inclusion of an Area Strategy directly addressing the Wandle Valley and recognising its value as a strategic resource. We warmly welcome the commitment to complete the Missing Link in the Wandle Trail at Earlsfield which complements Merton's Local Plan Projects on the borough boundary.</p> <p>16. We believe Policy PM10 can be strengthened by:</p> <p>Strengthening the Placemaking role of new development to require it to deliver a net gain in biodiversity – this is consistent with the enhancement expectation of Policy LP55 – and to support improvements to the quality and quantity of open space not just avoid a reduction</p> <p>Addressing the need for work on the Wandle to contribute to naturalising the way it functions, as supported by London Plan Policy SI17 and the Wandle Catchment Management Plan</p>

	<p>Requiring pedestrian priority in any plans for improving permeability and access along and across the river for active travel</p> <p>Recognising the role of both Wandle Valley Forum and Wandle Trust (SE Rivers Trust) as well as Wandle Valley Regional Park Trust in supporting and delivering change and providing partnership – both these organisations are currently more actively engaged on the Wandle than the Regional Park Trust</p> <p>Recognising in the historic significance of the Wandle itself and its related weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal</p> <p>Requiring development to create more opportunities for local people to manage and run buildings and open spaces along the Wandle</p> <p>1 17. We believe the Area Framework needs to be supported by:</p> <p>A Masterplan for the Wandle Valley to support delivery of the Area Strategy in the same way as is being provided for Wandsworth Town</p> <p>Acknowledging the complementary priority to be attached to delivery of the Wandle Valley's Catchment Management Plan</p> <p>Addressing the relationship with the All London Green Grid within the policy and not only the supporting text, consistent with the approach in Policy PM9 A 8.</p> <p>Identifying the area of Wandle Valley Regional Park, including showing it in the Policies Map as is done for both Merton and Sutton's Local Plans, and echoing Merton's Local Plan policy (CS5 (adopted Local Plan) and O8.7 (draft Local Plan)) for a 400m buffer zone</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Inclusion of LP55 is not considered necessary as it's requirements, including Biodiversity Net Gain, apply to the entire borough.</p> <p>The existing wording is considered sufficient and flexible in terms of naturalising the Wandle and is in line with London Plan Policy SI 17.</p> <p>The priority of any future routes or access along or across the river for active travel are considered best to be left to the individual sites and not per scripted in PM10.</p> <p>PM10 C (6) includes reference to work with stakeholders including community organisations and including all of them by name would be unnecessary.</p> <p>LP3 Historic Environment sets out requirements to protect and enhance heritage assets wherever possible, this extends to the Wandle where relevant.</p> <p>The Local Plan is not the appropriate place to set out that people can manage and run buildings and open spaces.</p> <p>The Council is not considering a masterplan for the Wandle Valley at this time.</p> <p>The Catchment Management Plan is not a Local Plan document and is not appropriate for endorsement in the Local Plan.</p> <p>LP53 includes reference to the All-London Green Grid and inclusions within PM10 would be considered unnecessary.</p> <p>The Policies Map include references to the designated green spaces currently in the borough and includes all the constituent parts of the Wandle Valley Regional Park, as it is not formally been made a park yet it cannot be included.</p> <p>LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses C sets out that the Council will seek financial contributions towards the provision, or upgrading, of riverside infrastructure including to achieve the objectives of the Wandle Valley Regional Park. Including a 400m is not considered appropriate for the Local Plan as the Regional Park is not formally designated or included in the Policies Map.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Heliport London Ltd
Consultee Organisation Details	
Agent Full Name	Tarun Cheema

Agent Organisation Details	Planner Centroplan
Comment ID	596
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>DRAFT LB WANDSWORTH LOCAL PLAN REVIEW (REGULATION 19) CONSULTATION</p> <p>We hereby submit the following representations to the draft LB Wandsworth Local Plan on behalf of Heliport London Ltd that has a contractual position on the land currently accommodating Heliport House. In particular, we object to Site Allocation RIV2 (Dovercourt site, York Road, SW11), object to Policy LP4 (Tall and Mid-rise Buildings), object to Appendix 2 (Tall Building and Mid-rise Building Maps), object to Policy LP33 (Promoting and Protecting Offices), and object to Policy RM9 (Wandsworth's Riverside).</p> <p>An explanation detailing the reasons for our objections are set out in the letter below and a suggested re-wording of each policy is also provided. Paragraph 35 of the NPPF sets out four requirements that a development plan must fulfil in order to be deemed to be 'sound':</p> <ol style="list-style-type: none"> 1 a) "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; 1 b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; 1 c) 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 1 d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant." <p>These requirements are referred to throughout the letter.</p> <p>Conclusion</p> <p>We consider that the proposed revisions are justified and would bring LB Wandsworth's draft Local Plan into soundness. We look forward to hearing from you in due course.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Heliport London Ltd
Consultee Organisation Details	
Agent Full Name	Tarun Cheema
Agent Organisation Details	Planner Centroplan
Comment ID	597
Title	RIV2 Dovercourt site, York Road, SW11
Number	Statement 57
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Site Allocation RIV2 (Dovercourt site, York Road, SW11)</p> <p><u>The Need to Optimise Sites for Housing</u></p> <p>At Paragraph 11.31 of LB Wandsworth's draft Local Plan, site allocation RIV2 prescribes a height range for the site of 7 to 10 storeys, where 10 storeys is considered to be a maximum. We consider this to be inappropriate for a range of reasons.</p> <p>First, the policy is not positively prepared, as it does not seek to meet the area's objectively assessed needs. Paragraph 11.27 of the Local Plan sets out the vision for the site as including "<i>residential use and new public open space, with replacement economic uses</i>". We have interpreted this to mean that the primary use of buildings on the site will be residential, as economic uses are only listed as 'replacement' – meaning that they will likely only occupy the lower floors of any redevelopment.</p> <p>In December 2020, LB Wandsworth published its Local Housing Needs Assessment (LHNA). The LHNA concludes that LB Wandsworth has an objectively assessed need for 2,537 dwellings per annum. Evidence from the Housing Delivery Test published in January 2022 revealed that LB Wandsworth delivered 1,812 homes in 2018/19, 1,659 in 2019/20 and 1,215 in 2020/21. While this surpassed the targets of the Housing Delivery Test, it falls short of the 2,537 identified by the Council's own evidence base.</p> <p>To meet the housing need set out in the LHNA, sites such as Dovercourt must be optimised, by constructing buildings at a high density. This is a position supported by London Plan Policy H1(b), which sets out a strategy to "<i>optimise the potential for housing delivery on all suitable and available brownfield sites</i>"¹ (emphasis added). The Dovercourt site's allocation indicates that it is suitable for residential-led redevelopment, but a maximum storey requirement of 10 storeys precludes the <i>optimisation</i> of the site. Optimising the site by making the allocation flexible enough to allow a taller development would enable the Council to meet its objectively assessed need for housing. In turn, the plan would be considered to be positively prepared.</p> <p>National policy offers a similar sentiment. Paragraph 125(a) of the NPPF states that: "<i>plans should optimise the use of land in their area and meet as much of the identified need for housing as possible</i>"² (emphasis added). LB Wandsworth's draft Local Plan is therefore inconsistent with national policy, as</p>

a ten storey development would not optimise the site as set out above.

Surrounding Tall Building Context

We recognise the 'optimisation' of sites is a subjective concept and under such circumstances, references to the planning context of the area is useful. Heliport House sits within the Dovercourt site allocation boundary, which itself has an implemented consent³ (confirmed via a certificate of lawfulness⁴) for a primarily residential development. The implemented consent is for a residential tower built atop the existing office building on site, to create a 20-storey building. However, the transfer gap between the existing office building and the proposed residential building means that in sum, the height of the building would be equivalent to 21 storeys.

The York Road Business Centre is in close proximity to the Dovercourt site and has permission⁵ for a residential development rising up to 20 storeys. There is an active application⁶ for the same site for the construction of a 24-storey development in co-living use. To the north of the site is Lombard Wharf, a constructed 28-storey tower in residential use. To the east of the site is the York Road and Winstanley Estate, which was granted permission⁷ for a comprehensive mixed-use regeneration, including six buildings that are at least 20 storeys tall, with the highest being 32 storeys. Further south on the site of a former Homebase, there is a constructed 24-storey residential development. The map below illustrates the proximity of all recently constructed or permitted tall buildings to the Dovercourt site, which is marked in red. Developments of 10-19 storeys are marked in yellow, while developments of at least 20 storeys (all of the sites described above) are marked in green:

In such a setting it seems entirely appropriate for a redevelopment of the Dovercourt site to be taller than 10 storeys to ensure that sites are optimised, provided this is verified by a thorough assessment defined by London Plan Policy D9 (Tall Buildings) and draft Local Plan Policy LP4 (Tall and Mid-rise Buildings)

Evidence Base for Tall Buildings

The maximum storey requirement is also not justified, as it is not based on proportionate evidence. In December 2021, LB Wandsworth published its Urban Design Study. The study assessed the sensitivity to tall buildings of various locations in the borough. The results are set out in the map⁸ below, with the Dovercourt site marked in red:

While much of LB Wandsworth is deemed highly sensitive to tall buildings, the site occupies an area where sensitivity is low. In light of this and the site's allocation, the urban design study identifies it as part of the River Thames frontage with a high capacity for development. Again, the Dovercourt site is marked in red:

The evidence base clearly sets out the fact that the site is suitable for the development of tall buildings, so in this sense, the draft Local Plan is not justified.

For the range of reasons specified above, we propose the following changes (in italics and underlined) to the RIV2 site allocation in LB Wandsworth's draft Local Plan:

11.31 Building heights - In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-B2-05. The *general* maximum appropriate height range for the zone is 7 to 20 10 storeys, and the *general* maximum appropriate height range for the site must be in accordance with the tall building maps in Appendix 2, *unless sufficient justification is provided to demonstrate that this threshold can be exceeded. Unless such justification is provided*, the height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings).

We feel that this affords more flexibility to the site allocation to allow it to be optimised for residential-led development. We have specified that justification for increased height must be provided, to ensure that any development of the site is of a high quality and satisfies the requirements of London Plan Policy D9 (Tall Buildings) and draft Local Plan Policy LP4 (Tall and Mid-rise Buildings).

	<p>1 London Plan (2021), p.157</p> <p>2 NPPF (2021), p.37</p> <p>3 Ref. 2013/6052, varied by ref. 2016/2315</p> <p>4 Ref. 2018/5315</p> <p>5 Ref. 2018/3776</p> <p>6 Ref. 2021/4936</p> <p>7 Ref. 2019/0024</p> <p>8 Wandsworth Borough Council Urban Design Study, Arup (2021), p.8</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. The Objectively Assessed Need figure is an unconstrained figure based on the Standard Methodology i.e. it does not take account of land supply, availability of developable land, other constraints such as designated parks and open spaces and the character of an area.</p> <p>Therefore, on the supply side, the GLA/Mayor of London has carried out a London-wide “Strategic Housing Land Availability Assessment” (SHLAA) as well as a London-wide Strategic Housing Market Assessment (SHMA). The SHMA identifies the (unconstrained) need for additional homes per annum (i.e. 66,000 across the capital). The purpose of the SHLAA on the other hand is to identify supply to meet future housing need, as well as being consistent with the policies set out in the overall NPPF. The SHLAA methodology takes account of the distinct circumstances in each of the boroughs, including the limited stock of land and the uniquely pressurised land market as well as dependence on recycling brownfield land currently in existing uses. The SHLAA methodology has been developed and refined over time, and Wandsworth Council officers have worked very closely in partnership with the GLA to assess potential sites and constraints. The London Plan has a 10-year target of 19,500 or 1,950 dwellings per annum for Wandsworth. For this reason, an authority’s housing target is not the same as the objectively assessed need because the need figure doesn’t take into account the area’s deliverable and sustainable supply capacity, defined with reference to constraints set out in the NPPF. In accordance with London Plan Policy D3, optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The Urban Design Study balances the demands (potentially competing) between optimising the use of sites to deliver required growth, and ensuring that well-designed places that reflect existing character are delivered.</p> <p>The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the ‘probability’ of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>Figures 212, 213 and 214 of the UDS are borough-wide maps that indicate an illustration of sensitivity, probability of change / development capacity at a level of detail expected from a map of the borough. This is clarified in section 4.2 of the UDS: ‘It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a higher or lower sensitivity than illustrated. Additionally, sensitivity has been assessed to a generic principle of a building that is approximately 50% higher than the existing average building height. Specific sites would need to consider sensitivity to specific development types including their land use and design quality. There may be smaller scale highly sensitive areas (including for example locally listed parks and gardens) which are not illustrated in the borough-wide map but would be sensitive to change. These are generally noted in the valued features descriptions in the character area profiles.’</p> <p>And in 4.3 (probability of change): ‘This is not to suggest that all sites within this areas are acceptable for development; rather, that as a whole the likelihood of change is higher.’</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Helipoint London Ltd
Consultee Organisation Details	
Agent Full Name	Tarun Cheema
Agent Organisation Details	Planner Centroplan
Comment ID	598
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP4 – Tall and Mid-rise Buildings</p> <p>In line with the arguments set out above, we also object to Policy LP4. For the avoidance of doubt, we are supportive of the criteria with which Tall and Mid-rise Buildings are assessed and our objection is technical in nature. To ensure consistency with the amendments to the RIV2 site allocation detailed above, we propose the following changes (in italics and underlined) to Part D of Policy LP4:</p> <p>Proposals for tall buildings should <i>generally</i> not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan, <i>unless sufficient justification is provided to demonstrate that this threshold can be exceeded</i>. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p>

Proposed Change	No changes considered necessary.
Consultee Full Name	Heliport London Ltd
Consultee Organisation Details	
Agent Full Name	Tarun Cheema
Agent Organisation Details	Planner Centroplan
Comment ID	600
Title	Tall Building Zone TB-B2-02, TB-B2-05, and TB-B2-06
Number	Map 23.9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Appendix 2 – Tall Building and Mid-rise Building Maps</p> <p>Similarly, to ensure consistency with the above objections, we object to the Tall Building and Mid-rise Building Maps that are shown in Appendix 2 of the draft Local Plan. In particular, we object to the TB- B2-05 Tall Building Zone designation, within which the Dovercourt site sits. At present, Map 23.9 groups TB-B2-05 with other Tall Building Zones – TB-B2-02 and TB-B2-06 – with the appropriate height for the zones listed as 7-10 storeys. We propose that a new map is added, which disaggregates TB-B2-05 from the other two Tall Building Zones in Map 23.9, with the appropriate height listed as 7-20 storeys for the reasons specified above.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The approach to tall and mid-rise building heights and zones, is considered to be consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations. The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance.
Proposed Change	No changes considered necessary.
Consultee Full Name	Heliport London Ltd
Consultee Organisation Details	

Agent Full Name	Tarun Cheema
Agent Organisation Details	Planner Centroplan
Comment ID	601
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP33 – Protecting and Promoting Offices</p> <p>Before detailing the nature of our objection, we must first express our support of the general sentiment expressed in the policy. Protecting and promoting offices in the areas specified in the policy plays – and will continue to play – an important role in ensuring employment opportunities are consolidated into the most sustainable locations in LB Wandsworth. Hence, our objection is relatively minor and relates to clarification of the scope of the policy. In the policy itself, Part E states that “<i>Existing office floorspace in the areas identified in Parts A and B will be protected.</i>” Accordingly, the Parts A and B defines these areas:</p> <p>“A. <i>The Council will support the development of new office space within the Central Activities Zone (CAZ), focused on the emerging centres at Battersea Power Station and Vauxhall. These areas will cater for the provision of predominantly large-scale office floorspace for high-value occupiers and related businesses, to support their potential as strategic employment hubs.</i></p> <p>B. <i>Outside the CAZ, new office development will be supported in the following locations, subject to compliance with any applicable area-specific criteria. Such development will be expected to cater primarily for the local and sub-regional office market and should provide workspace suitable for small and medium enterprises (SMEs). Larger businesses will also be appropriate in town centres, where the provision of flexible and touchdown space will also be encouraged.</i></p> <p>1. <i>Town and Local Centres</i></p> <p>2. <i>Appropriate edge-of-centre sites allocated for office use, including within:</i></p> <p>a) <i>Economic Use Intensification Areas (EUIAs)</i></p> <p>b) <i>The Battersea Design and Technology Quarter (BDTQ) (see Policy LP34, Part B – Managing Land for Industry and Development)</i></p> <p>3. <i>Economic Use Protection Areas (EUPAs)”</i></p> <p>Together with Part E, Parts A and B offers a comprehensive summary of the areas subject to Policy LP33. However, the supporting text for this policy at Paragraph 18.19 is more ambiguous. It states that:</p>

"Given the positive forecast for office floorspace demand to 2034, it will be important for the Council to not only promote and nurture the provision of new space in the local office market, but to ensure that fit for purpose space is retained so that it can contribute to the increase in demand. The redevelopment of such space, where this is in sustainable locations, should therefore be resisted unless the redevelopment provides at least full replacement provision of an equal or greater standard. For appropriate areas and premises, the policy allows a change of use subject to the applicant demonstrating that there is no demand for premises through a robust and meaningful marketing exercise. Appendix 1 sets out the requirements for establishing redundancy of office premises."9 (emphasis added)

The text only defines the scope of the policy as "*in sustainable locations*". We presume this refers to the areas specified in Parts A and B of LP33, where office space is protected, but would like this to be explicitly outlined in Paragraph 18.19. While such ambiguity remains, conflicts may ensue about the specific areas that the policy pertains to.

We propose the following alterations (in italics and underlined) to Policy LP33:

Given the positive forecast for office floorspace demand to 2034, it will be important for the Council to not only promote and nurture the provision of new space in the local office market, but to ensure that fit for purpose space is retained so that it can contribute to the increase in demand. The redevelopment of such space, where this is in sustainable locations (*i.e. the areas set out in Parts A and B of Policy LP33*), should therefore be resisted unless the redevelopment provides at least full replacement provision of an equal or greater standard. For appropriate areas and premises, the policy allows a change of use subject to the applicant demonstrating that there is no demand for premises through a robust and meaningful marketing exercise. Appendix 1 sets out the requirements for establishing redundancy of office premises.

9 LB Wandsworth Local Plan Publication (Regulation 19) Version (2022), p.368

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. It is agreed that as it currently reads, Policy LP33 is potentially ambiguous. To remove such ambiguity, the reference to 'sustainable locations' should be clarified.
Proposed Change	Amend paragraph 18.19 as follows: "...The redevelopment of such space, where this is in sustainable locations (<i><u>i.e. the areas set out in Parts A and B of LP33</u></i>), should therefore be resisted unless the redevelopment provides at least full replacement provision of an equal or greater standard..."

Consultee Full Name	Heliport London Ltd
Consultee Organisation Details	
Agent Full Name	Tarun Cheema
Agent Organisation Details	Planner Centroplan
Comment ID	604
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy RM9 – Wandsworth’s Riverside</p> <p>Once more, we support the general objectives of this Policy, but require clarification on its scope to ensure consistency with Policy LP33. Part B of Policy RM9 currently states:</p> <p><i>4. “Existing economic floorspace within the Economic Use Protection Areas, Focal Points of Activity, and railway arches should be protected, and redevelopment should explore the opportunity for the intensification of industrial uses, where appropriate. Where economic floorspace is provided, this should incorporate affordable creative workspace and support the incubation and growth of new creative businesses.”</i></p> <p>There is ambiguity surrounding which type and location of economic floorspace is covered by this policy. Policy LP33 covers office floorspace and excludes sites within Focal Points of Activity, while Policy LP34 seeks to protect industrial land and includes sites within Focal Points of Activity. Reading Policies LP33 and LP34 in conjunction therefore suggests that industrial space is intended to be protected in Focal Points of Activity, but office space is not.</p> <p>However, Policy RM9 does not disaggregate these two types of economic floorspace, which created inconsistency. A development proposal that removes office floorspace in a Focal Point of Activity might be considered contrary to Policy RM9, which protects <i>economic</i> floorspace generally. On the contrary, the same proposal would be compliant with Policy LP33, which does not seek to protect office floorspace in Focal Points of Activity.</p> <p>To avoid this contradiction, we suggest the following amendments to Part B of Policy RM9:</p> <p>Existing economic floorspace within the Economic Use Protection Areas, Focal Points of Activity, and railway arches should be protected <i>(in conjunction with the requirements of Policy LP33 and Policy LP34)</i>, and redevelopment should explore the opportunity for the intensification of industrial uses, where appropriate. Where economic floorspace is provided, this should incorporate affordable creative workspace and support the incubation and growth of new creative businesses.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. It is agreed that as it currently reads, Policy PM9.B.4. can be read as inconsistent with the requirements for the re-provision of office floorspace set out in LP35 (Mixed Use Development on Economic Land). As identified in the representation, LP35.A.3. requires that development schemes 'seek to maximise the re-provision of existing office floorspace'. The reference to the 'protection' of economic land should be clarified as needing to be applied in the context of LP33, LP34, LP35 and LP36 (as it relates to railway arches).
Proposed Change	Amend the wording of Policy PM9.B.4 as follows: "Existing economic floorspace within the Economic Use Protection Areas, Focal Points of Activity, and railway arches should be protected <i>in accordance with Policies LP33 (Promoting and Protecting Offices), LP34 (Managing Land for Industry and Distribution), LP35 (Mixed Use Development on Economic Land) and LP36 (Railway Arches)</i> , and redevelopment should explore the opportunity..."
Consultee Full Name	Mr James Stevens
Consultee Organisation Details	Strategic Planner Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	605
Title	Paragraph
Number	2.8
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Housing need / plan requirement The London Plan sets a target for Wandsworth of 19,500 additional homes to be provided over a ten-year period (2019/20 to 2028/29). This represents an annualised average target of 1,950 new homes per year. The Local Plan establishes a requirement for 20,311 homes over the 15-year plan period.
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr James Stevens
Consultee Organisation Details	Strategic Planer Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	606
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>SDS1 Spatial Development Strategy 2023 – 2038</p> <p><u>The policy is unsound because it is inconsistent with London Plan and national policy.</u></p> <p>The calculation of the housing requirement and what annualised figure will be used to measure performance is unclear.</p> <p>Part A of the Policy states:</p> <p>“Within the period 2023 – 2038 the Local Plan will provide for a minimum of 20,311 new homes. This includes the provision of a minimum of 1,950 new homes per year up until 2028/2029, including on small sites.”</p> <p>The London Plan establishes a requirement for Wandsworth to provide 1,950 dwellings per year for the ten years running from 2019/20 to 2028/29, or 19,500 homes in total.</p>

First, the Local Plan is unclear as to how the overall requirement figure of 20,311 homes for the 15-year plan period has been calculated. It appears that the Council is assessing delivery for the period 2019/20 - the start date of the London Plan, until 2022/23 – the period prior to the start of the Plan. This implies that the Council is observing the requirement for 1,950 dpa for the four year period 2019/20 to 2022/23. That would suggest a need for 7,800 homes for that three-year period.

The table on page 35 provides a picture of the Council's performance. This shows for those four years the following figures:

2019/20	1,359
2020/21	1,422
2021/22	2,571 (projected)
2022/23	2,169 (projected)

If delivery keeps pace with the projected figures, that would suggest that 7,521 new dwellings will be provided – a very little short (279) of the 7,800 required. It is unclear if the Plan is factoring this small shortfall into the new housing requirement to ensure that the London Plan targets for Wandsworth are delivered. Moreover, it is unclear what the Plan will do if delivery in 2021/22 and 2022/23 fails to match the projected supply. Will the shortfall be added to the housing requirement for the Local Plan, or is the deficit written-off? The Plan should clarify this.

Second, and of greater concern, it is unclear what annual figure is being used for the 15-year period 2023/24 to 2038/39. It is clearly not the figure of 1,950dpa applied across each of the 15-years from 2023/24 to 2038/39 because that would require 29,250 homes in total.

We acknowledge that the London Plan is only able to establish housing requirements for the London boroughs for the ten-year period 2019/20 to 2028/29. After that, housing capacity is uncertain. The London Plan states that setting annual housing requirements for the period after this should be based on evidence of capacity. As paragraph 4.1.11 states:

If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.

The Wandsworth Local Plan needs to be clear what figures it will be using to measure performance for the period 2029/30 to 2038/39. The figure of 20,311 homes would suggest an annualised requirement of 1,354dpa for the fifteen years the plan is intended to operate over. Alternatively, if one assumes that the 1,950dpa figure applies only from 2023/24 to 2028/29 that would give a figure of 9,750. Over ten years that would generate a figure of 19,500. This implies that for the last five years of the Plan a remaining requirement 811 homes or 162dpa.

We accept that there is no established or consistent approach to how local authorities implement the housing targets established by the London Plan for the period after 2029/30. Every local authority seems to have its own approach. Some local authorities roll the London Plan figures forward for the period beyond 2028/29. Others commence delivery of the London Plan targets from the date their new plan commences. It is unclear what approach Wandsworth is following, but an annual figure of 1,354dpa is likely to be insufficient in terms of addressing housing needs, especially if any deficits accrued in the years before the Plan based on the new London Plan targets are written-off.

For example, we note that the Council's most recent assessment of housing need, using the revised standard method – undertaken on 16 December 2020, indicates that the local housing needs figure is 3,425dpa. Paragraph 1.5 of the *Wandsworth Local Housing Needs Assessment*, December 2020 states that the stepped approach set out in PPG results in a figure of 2,537 or 45,666 between 2019 and 2037. As paragraph 1.28 concludes:

The Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and seek to meet this as much as possible, subject to sufficient supply of deliverable sites being identified.

These are high figures, driven no doubt by the acute affordability pressures specifically in Wandsworth and more generally across London (as a single housing market area), indicating that an average figure of 1,354dpa is probably inadequate in terms of addressing the housing needs of the people of the borough.

We note also in the *Wandsworth Local Housing Needs Assessment*, December 2020, the report observes that the affordable housing model generates a total net need of 3,575 dwellings per annum for the period 2019 and 2037 (paragraph 1.10).

It is necessary for Wandsworth to provide some more clarity of what its annual housing requirement is to assist with the monitoring of the Council's performance on housing delivery on an annual basis, especially for the period after the current London Plan annual housing targets cease to operate.

The Council would be prudent to roll-forward the London Plan target in view of the possibility of delays in the production of a fresh London Plan, and because of the shortfall in planned housing supply against assessed need across London in general. On the basis of the new London Plan, that shortfall is 14,000 homes a year. This is the difference between the assessed need for 66,000 homes a year and the capacity for 52,000 homes a year.

The London Plan is also under-delivering against its annual housing requirement to provide 52,000 net additions each year for the ten years between 2019/20 and 2028/29.

DLUHC Live Table 122: Net additions to the dwelling stock

London

Year

2019/20

2020/21

Net additions

40,870

37,183

As can be seen, against a requirement for 104,000 homes to have been provided in the first two years of the London Plan (52,000 x 2), London is already facing a deficit in the delivery of 25,947 homes.

To remedy this potential shortcoming with the Plan (if we have understood the Council's approach correctly) the Council could do two things.

1) roll-forward the annual target in the London Plan for the remainder of the plan-period – i.e. 1,950dpa for each year from 2029/30 to 2037/38. This would require 29,250 homes in total.

2) Conversely, an alternative approach would be to set a requirement up to 2032/33 for 1,950dpa – i.e. the first ten years of the Plan, but then make it clear that the Wandsworth Local Plan will default to a new requirement if a new London Plan is adopted before then or else default to the Government's Standard Method for the year 2032/33 to 2037/38.

Housing capacity

Part B of the policy identifies capacity for 24,380 homes for the plan period. This indicates that the Council would not have the capacity to deliver 1,950dpa for 15-years which would require land for 29,250 homes, but it would have capacity to adhere to our second suggested approach, which is also the approach recommended by the London Plan.

The settlement hierarchy is unsound because it is unjustified.

Part A.1 goes onto state:

The new homes will be allocated in accordance with the following sequential approach:

1 *Within the following locations reflecting their strategic economic role and/or opportunities for regeneration as defined through the boundaries of the Area Strategies:*

- a. *Wandsworth Town (including the Wandle Delta sub-area)*
- b. *Putney*
- c. *Tooting*
- d. *Balham*
- e. *Clapham Junction and the York Road/ Winstanley Estate Regeneration Area*
- f. *The Roehampton and Alton Estate Regeneration Area*
- g. *Nine Elms*
- h. *Wandsworth's Riverside*
- i. *The Wandle Valley*

- 1 *On allocated sites outside of the above areas.*
- 2 *Through the intensification of small sites within areas of higher accessibility.*

1 *Through lower levels of intensification on small sites elsewhere in the borough*

It is unclear what the Council is proposing here. This suggests that planning applications for residential development made in categories 2,3 and 4 – including on sites that have been allocated - will be refused until all development opportunities have been exhausted in category

1 This probably is not the Council's intention, but the reference to a 'sequential approach' means that the policy could be read in this way.

We recommend that the policy is redrafted to read:

"The new homes will be allocated in the following categories:"

Parts 2, 3 and 4 are unnecessarily restrictive. The borough is very well served by public transport. Nowhere is so distant from public transport that it could not support fresh housing. Every part of the borough should contribute to meeting housing needs. Housing delivery should be encouraged in all locations, including both windfall supply and on allocated sites. Parts 2, 3 and 4 should be replaced so that the Plan supports residential development on all sites in all locations in addition to the Area Strategies.

Small sites requirement

The Plan's approach to delivery on small sites is unsound because it is ineffective.

The London Plan introduces a requirement for 4,140 dwellings (or 414 per year) to be provided on small sites of 0.25ha in size or less for the period 2019/20 to 2028/29.

Part B identifies land for 24,380 homes. Within this table is a figure of 4,848 for small sites across the borough. However, this is a 15-year plan, and the London Plan at paragraph 4.1.11 recommends that the small sites assumption is rolled forward for plans that extend beyond the end date of the London Plan, even if the overall annual requirement is not. The small sites requirement of 414dpa for 15 years would require land for 6,210 homes. The Council should identify sufficient land to meet this requirement of the London Plan.

Second, national policy (NPPF, paragraph 69) and the London Plan (Policy H2, Part B3) expect local authorities to identify and allocate sites to achieve these targets. The purpose of these policy interventions by Government and the London Mayor is to assist SME housebuilders who struggle to find land. The tendency for local plans not to allocate small sites (1 ha or less nationally and 0.25ha in London) makes it difficult for SMEs to establish themselves and survive and this inhibits housing delivery overall.

On page 7 of the Housing and Economic Land Assessment, January 2022, the Council observes:

To avoid double counting of known permissions and the windfall, the total capacity of sites of less than 0.25ha with planning permission projected to complete for each year within the Local Plan period has been deducted from the annualised targets, with the remaining assumed to be the windfall capacity.

Table 2 in the same report the Council shows the composition of the small sites target:

As the table demonstrates, some of the small sites requirement will be provided on sites with planning permission (therefore allocated) – 2,719 in total. This is a welcome outcome and the Council should be commended for its efforts, but the Council should do more to actively identify and allocate other small sites to ensure the overall requirement of 4,140 homes is delivered (or the higher figure of 6,210 homes if our reasoning about planning for 15-years is accepted). The fact that many of these sites already have planning permission, however, does suggest that these sites were windfall sites that came forward by luck, rather than active allocation by the Council, although may be wrong.

Local Plan housing trajectory

The *Housing and Economic Land Assessment, 2022*, provides a housing trajectory on page 10. This shows delivery peaking towards the middle of the plan but falling dramatically in years 2029/30 to 2032/33.

There are no figures provided for the last five-year segment – the years 2033/34 to 2037/38. This is reinforced by Table 2 reproduced above. Table 2 and Figure 2 suggest that the Council has no firm plans for housing delivery beyond 2032/33. Table 2 suggests that in the period 2033/34 to 2037/38 it appears that only 3,179 homes will be provided (24,381 less 21,202). This equates to 636dpa. The Council’s justification for this is explained in para. 2.105 of the Plan and on page 9 of the *Housing and Economic Land Assessment*. The Council explains, that in line with the advice in the London Plan, it has rolled-forward the small sites target of 414dpa.

Given the evidence of housing need in the borough the Council would be unjustified to plan for so few homes in this five-year period. While we acknowledge that land supply is uncertain for this period, and much will depend on the next review of the London Plan, it would be unjustified to allow planned housing supply to fall away to such a low level relative to the evidence of need. The Council should amend the plan to adopt either one of the two measures recommended above – roll forward the 1,950dpa figure or default to the Standard Method.

Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	<p>Comment noted.</p> <p>First, the housing requirement figure of 20,311 is based on the London Plan requirement for Wandsworth to 2028/2029 and a combination of the small sites target and SHLAA sites, which reflects the Plan's suggested approach to meeting housing need beyond 2029.</p> <p>The figures in the plan at para 2.104 do, in fact, show a small deficit for the years 2019-2023, but this is more than compensated for by the years prior to 2019, when completions were at a higher rate.</p> <p>Housing completions and projections will be monitored throughout the plan period.</p> <p>In respect of the settlement hierarchy, the Council considers that a suggested minor change to the Local Plan would be appropriate.</p> <p>However, the categories 2, 3 and 4 do not exclude any part of the borough; category 4 covers areas 'elsewhere in the borough'. Some parts of the borough - particularly in the south and west - are poorly served by public transport. The establishment of categories 1-4 seeks to establish the preferable areas for housing development given their characteristics and attributes, and focus on these areas more intensively.</p> <p>The Plan allows for the small sites target to be met over the plan period. The figure of 4,848 does not include units to be delivered on small sites (1,362) that already have an approved permission.</p> <p>The London Plan estimates the supply of small sites across London and provides a small sites target for each borough. This is considered to be a reliable source of windfall sites which contributes to anticipated supply, as set out in paragraph 4.2.3 of the London Plan. Boroughs are not required by the London Plan to identify and / or allocate small sites. The Local Plan includes a policy to promote the development of small sites at LP7.</p>
Proposed Change	<p>Amend the end of criterion A, prior to bullet 1, delete, 'The new homes will be allocated in accordance with the following sequential approach' and replace with, '<u>The new homes are allocated in the following categories:</u>'</p> <p>Delete, 'the following' from criterion A.1</p>
Consultee Full Name	Mr James Stevens
Consultee Organisation Details	Strategic Planer Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	607
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP23: Affordable Housing</p> <p><u>The affordable housing target is unsound in parts because it conflicts with national and London Plan policy.</u></p> <p><u>Part A</u></p> <p>The policy implies that all eligible schemes will need to provide 50% affordable housing. It is unclear if the Council intends to comply with London Plan policy H5 and operate the threshold approach to providing affordable housing. This is not referred to in the policy. The threshold approach requires applicants for schemes providing market housing to commit to providing at least 35% affordable homes in return for a faster determination of the application that dispenses with the details of viability is an approach that is generally welcomed by the industry. The requirement rises to 50% on public land. There are indications that the policy has helped to increase the supply of affordable homes in London since it was in operation in 2017. We would welcome Wandsworth's support for the threshold policy approach in its local plan.</p> <p><u>Part E</u></p> <p>The Council says that it will disapply the Vacant Building Credit (VBC) in Wandsworth. This is unsound because it conflicts with national policy. The Mayor sought to suspend the VBC for London as a whole through the London Plan but the examining panel concluded that this would be inappropriate. We acknowledge the acute need for affordable housing but the Government introduced the VBC in order to incentivise the delivery of housing on brownfield land. Many other urban centres in England have not disappplied the VBC.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The London Plan covers affordable housing policy over policies H4 to H7. Policy LP23 states immediately, within criteria A, that the Council will seek to maximise the delivery of affordable housing in accordance with the London Plan. This is not ambiguous or implied.</p> <p>The Local Plan doesn't disapply the VBC. It defines circumstances in which it can be applied. The policy justification explains why the VBC has been treated in this way.</p>
Proposed Change	No change considered necessary

Consultee Full Name	Mr James Stevens
Consultee Organisation Details	Strategic Planer Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	608
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Local Plan: Regulation 19 consultation</p> <p>Thank you for consulting on the Wandsworth Local Plan, Regulation 19 version. The following response is provided by James Stevens, Director for Cities, on behalf of the Home Builders Federation (HBF).</p> <p>The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 51% of all affordable homes built in 2020/21.</p> <p>James Stevens contact details are: Home Builders Federation HBF House, 27 Broadwall London, SE1 9PL</p> <p>Telephone: 020 7960 1621 Email: james.stevens@hbf.co.uk</p> <p>HBF would like these representations to read alongside our previous Regulation 19 submission.</p> <p>The HBF would like to appear at the examination-in-public to discuss any remaining issues of soundness raised by these representations.</p> <p>Plan period</p>

	<p>Para. 1.5 states that the Council's Local Plan will operate over the plan period of 2023 to 2038 – a period of 15 years.</p> <p>It would be helpful if the Local Plan could state this on its front cover.</p> <p>HBF is very happy to discuss these representations with the Council if this would assist with the progression of the new Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. For presentational clarity, the final version of the Plan could contain the plan period.
Proposed Change	Amend the final front cover of the Plan to contain the Plan period of 2023-2038.
Consultee Full Name	Mr James Stevens
Consultee Organisation Details	Strategic Planer Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	609
Title	LP31 Specialist Housing for Vulnerable People
Number	Policy 42
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP31: Specialist Housing for Vulnerable People</p> <p><u>The policy is unsound in part because it does not comply with the London Plan.</u></p> <p>We note para. 2.4. This observes:</p>

“As a result of improvements to life expectancy, the number of elderly residents is increasing. The estimated percentage of older person (65+) residents in the borough was 9.5% (based on 2018 ONS population estimates); this is projected to increase to 12.5% by 2036 (GLA 2018-Based Housing-Led).”

Although a relatively a young city, increasing life expectancy means that London's population is aging. The London Plan recognises this in paragraph 14.13.1 when it observes:

“By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to meet the needs of older Londoners.”

To cater for the needs of older people, London Plan policy H13 establishes benchmark targets for each borough for the supply of older persons accommodation. These benchmark figures are provided in Table 4.3. These are not binding targets, but indicative figures to guide the decision-making of the London boroughs to ensure that they are considering the needs for specialist older persons housing. The figure for Wandsworth is 120 units per annum.

Para. 4.13.4 clarifies that this policy does not cover care home accommodation.

To adhere to national and London Plan policy, the Plan should refer to the London Plan policy and the benchmark target for Wandsworth. It should include the benchmark target in its policy LP31. The policy should be clear that the benchmark target relates to the supply of older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy. This is set out in paragraph 4.15.5 of the London Plan. The Council may wish to establish separate requirements for other types of specialist accommodation.

Part B, 1 of the policy should be deleted in so far as it relates to older persons housing covered by London Plan policy H13. Applicants to build older persons accommodation should not have to demonstrate a need. That need has been demonstrated by the London Plan. In the same way that the London Plan sets the housing requirements for the London boroughs, based on the GLA SHMA 2017, so it does for older persons housing.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The benchmark figure from the London Plan is included in the supporting text at para 17.57. This acknowledges the strategic advice of the London Plan and provides the context for the local needs assessment that forms part of the evidence base. The policy is written with an understanding of the differences in Wandsworth's needs from those of the city as a whole. This approach is considered to be both in conformity with the London Plan and responsive to local pressures.</p> <p>The policy is written with an understanding of the differences in Wandsworth's needs from those of the city as a whole. This approach is considered to be both in conformity with the London Plan and responsive to local pressures. Whilst need is demonstrated strategically in the London Plan, the Local Housing Needs Assessment is more specific to Wandsworth's particular demography.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Mr

	James Stevens
Consultee Organisation Details	Strategic Planer Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	610
Title	LP55 Biodiversity
Number	Policy 66
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP55 Biodiversity</p> <p><u>Part B, 1 is unsound because it is ineffective.</u></p> <p>Part B, 1 states:</p> <p><i>Development proposals will be required to protect and enhance biodiversity, through:</i></p> <p>1 <i>ensuring that it would not have an adverse effect on the borough's designated sites of habitat and species of importance (including buffer zones), as well as other existing species, wildlife, habitats and features of biodiversity value;</i></p> <p>The policy requires applicants to have regard to buffer zones but we are unaware if these buffer zones have been delineated in the Plan. It would, consequently, be unclear to applicants if a development proposal infringes upon a buffer zone. Paragraph 16 of the NPPF requires that Plans contain policies that are clear and unambiguous to allow decision makers to know how to respond to development proposals. It would be helpful if these buffer zones were shown on Map 21.3. However, this prompts a question about whether these buffer zones would become an obstacle to housing delivery, especially if these buffers are drawn generously. We note that paragraph 21.28 notes that many of the small sites are not identified on the Policies Map. This could cause major uncertainty for development proposals. This is an issue that requires attention.</p> <p><u>Part B, 2 is unsound because it is ineffective.</u></p> <p>Part B, 2 requires:</p> <p><i>The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings and use of Sustainable Drainage Systems where appropriate. Developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements</i></p>

	<p>The policy requires applicants to deliver a net gain in biodiversity but without specifying how much. Without specifying this it would be hard for applicants to know what to do. The Council should specify how much and justify this.</p> <p>Biodiversity Net Gain</p> <p>We note paragraph 21.32. The Council says that provisions relating to biodiversity net gain, will be inserted into the Local Plan through a modification. This will happen once the Environment Bill receives royal assent. Among other things, as the Council acknowledges, the Bill is likely to require the creation of Local Nature Recovery Networks and Strategies. These will be important to enable developers to identify opportunities to provide improvements and enhancements to biodiversity if this cannot be secured onsite.</p> <p>The identification of these areas will be very important to enable the implementation of the objectives of the Plan. Without these opportunities it is possible that the delivery of development needs targets, including targets for housing, will be unfeasible.</p>
<p>Change(s) considered necessary</p>	
<p>Wishes to attend Hearing Session</p>	
<p>Reason why</p>	
<p>Council Response</p>	<p>Comment noted. It is agreed to remove the words 'buffer zones' however supporting text should be included to clarify that assessment of adverse effects would be considered on the designation and its surrounding area.</p> <p>Part B 2 is considered sound as it requires proposals to deliver a net gain in biodiversity, the amount of which will be decided on a case by case basis unless the Environment Act sets out a higher standard in which case that will be followed.</p> <p>The creation and identification of Local Nature Recovery Networks and Strategies will not be able to come forward as part of this Local Plan process but may still be undertaken by the Council separately.</p> <p>The London Plan estimates the supply of small sites across London and provides a small sites target for each borough. This is considered to be a reliable source of windfall sites which contributes to anticipated supply, as set out in paragraph 4.2.3 of the London Plan. Boroughs are not required by the London Plan to identify and / or allocate small sites. The Local Plan includes a policy to promote the development of small sites at LP7.</p>
<p>Proposed Change</p>	<p>Amend the wording to LP55 Biodiversity as follows:</p> <p>Development proposals will be required to protect and enhance biodiversity, through:</p> <ol style="list-style-type: none"> 1 ensuring that it would not have an adverse effect on the borough's designated sites of habitat and species of importance (including buffer zones); as well as other existing species, wildlife, habitats and features of biodiversity value; <p>Insert new paragraph after paragraph 21.31</p> <p><i>National Government's guidance for Habitat Regulations Assessments specifies that assessments must consider any project that might have an impact on a designation. When assessing development proposals the Council will consider the impact the proposal has on the designation or in close proximity to the designation. Whether or not a proposed development impacts on a designated site will depend on the type of proposal, the reason for designation, and the level of designation. More mobile priority or protected species are more likely to be impacted by developments further away than static or site faithful species.</i></p>
<p>Consultee Full Name</p>	<p>Mr</p>

	James Stevens
Consultee Organisation Details	Strategic Planer Home Builders Federation
Agent Full Name	
Agent Organisation Details	
Comment ID	611
Title	Paragraph
Number	22.14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Viability</p> <p><u>The Plan is unsound in relation to its treatment of development viability because it is contrary to national policy.</u></p> <p>Paragraph 22.14 states:</p> <p><i>The Council has undertaken a 'whole Plan' viability assessment. However, it is recognised that the housing and commercial property markets are inherently cyclical such that a fully policy compliant scheme may make some development proposals unviable at the time of submitting a planning application. The Plan sets out the approach that the Council will take to assessing such proposals and the mechanisms that it will adopt to ensure that schemes contribute fully should viability improve.</i></p> <p>This is not the approach established in national policy. The NPPF begins from an assumption that all policies in an up-to-date local plan are achievable and hence viable, and therefore the scope for applicants to contest the viability of policies is much reduced. The obligation, therefore, at the plan-making stage is on the plan-maker to ensure that the policies in the local plan are viable and will not jeopardise delivery of the plan objectives.</p> <p>Wandsworth's Local Plan at policy LP23: Affordable Housing requires 50% affordable housing from all eligible developments. As we have discussed above, the Plan is unclear about the role of the Mayor's threshold approach to affordable housing, so it appears that 50% is basic requirement. If that is the case, then the <i>Local Plan Viability Assessment, January 2022</i> shows that this will cause delivery issues across a number of scenarios.</p> <p>The <i>Local Plan Viability Assessment, January 2022</i> observes at paragraphs 7.20 and 7.21 that the 50% affordable housing target could cause difficulties against some typologies:</p> <p><i>Therefore Scenario 2 considers the impact of 50% affordable housing across all residential developments with 10 or more dwellings.</i></p>

The results in Table 7.5 show that this requirement would result in most of the tested value area 1 typologies and about half the tested value area 2 typologies may be challenged in delivery viable development. But likewise, around half the tested value 2 area typologies and all the tested value 3 area typologies would still be able to deliver 50% affordable units along with other Reg 19 Local Plan policies, and it is in these two areas where the bulk of site allocations are located.

Table 7.5 on pages 88-89 of the report is reproduced below.

As can be seen, several typologies are unviable. The value areas where these developments types are located may not be the areas where the majority of residential development is going

to be concentrated, but given the tight land supply constraints especially the uncertainty of land supply for housing for the period beyond 2033 (the Council relies on a windfall assumption for this period) the Council needs to ensure that all areas of the borough are able to make a contribution to the supply of homes especially in the first ten years of the life of the Plan.

The Council should ensure that the Mayor's threshold approach is supported and adopted by the Wandsworth Plan.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Policy LP23 states immediately, within criteria A, that the Council will seek to maximise the delivery of affordable housing in accordance with the London Plan. This is not ambiguous or implied. The assumption therefore that 50% is a basic requirement is incorrect, as is the argument that the viability work is flawed.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Pocket Living
Consultee Organisation Details	Pocket Living
Agent Full Name	Mr Thomas Hatch
Agent Organisation Details	Quod
Comment ID	612
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>These representations are submitted on behalf of Pocket Living in response to the Wandsworth Local Plan Review (Regulation 19) Consultation.</p> <p>The Regulation 19 consultation is a statutory consultation on the test of soundness of the revised local plan and whether it is legally compliant. To ensure the local plan is sound, it should meet the following criteria:</p> <ul style="list-style-type: none"> ? Positively prepared (seeks to meet LBW objectively assessed need); ? Justified (based on proportionate evidence); ? Effective (deliverable over the plan period); and ? Consistent with national policy (enabling the delivery of sustainable development). <p>All representations are required to be submitted to the planning inspectorate for the examination in public along with the revised local plan and supporting evidence.</p> <p>About Pocket Living</p> <p>Pocket Living ('Pocket') is an innovative award-winning SME developer established in 2005 to deliver discounted affordable homes for eligible first-time buyers. Pocket provides high quality carefully designed, space standards compliant 38sqm one-bed intermediate affordable homes to households who cannot afford to buy a good quality home but would also not be eligible for social housing. These households typically include front-line key workers who are essential to local communities.</p> <p>Pocket's discounted homes meet the statutory definition of affordable housing set out in Annex 2 of the National Planning Policy Framework (NPPF). Planning agreements ensure that Pocket affordable homes are provided at a minimum 20% discount to open market values and are reserved for eligible purchasers who live or work locally and do not own their own home. Unlike Shared Ownership (which can revert to private sale) covenants in the planning agreement and lease ensure that the homes remain as affordable housing in perpetuity, helping</p>

future generations. Pocket also manage resales to ensure homes always go to other eligible local first-time buyers (earning below the relevant local income threshold) who will benefit most from them and monitors occupation to ensure they are not sublet for profit.

A specialist in small and complex sites, Pocket is known for the delivery of well-designed homes using modular technology. The homes that Pocket builds stay affordable forever and so are designed for the long term with lasting quality. Pocket also encourages a sense of community amongst its residents, starting with welcome drinks and aided by communal spaces such as roof terraces and co-working rooms. Support for SMEs, like Pocket, within the development sector is reinforced nationally by Central Government as set out most recently in the publication of the Government's consultation 'Planning for the Future' which highlights the Government's objective to diversify the housing industry and encourage innovation in housing delivery.

Pocket's discounted homes provide an important route to ownership. The importance of what Pocket does is recognised in partnerships with Homes England and the Greater London Authority. It is also recognised in national policy which now: i) provides strong support for affordable home ownership products including First Homes and Discounted Market sale (requiring a proportion in all schemes); and ii) requires local authorities to plan for the needs of households who wish to buy but can't afford to (an estimated 87% of all private renters) (Paragraph: 020 Reference ID: 2a-020-20190220).

Pocket is the UK's only development business focused entirely on delivering grant free discounted affordable homeownership for first time buyers. Pocket has also delivered the iconic Mapleton Crescent tower in Wandsworth Town. The 52 Pocket homes in this scheme had 1,200 local first time buyers apply for the homes.

Pocket has delivered over 1,000 homes across the Capital and has over 1,500 more in planning and construction (Figure 1). The homes are popular with first time buyers and currently Pocket has a list of over

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- ? Positively prepared (seeks to meet LBW objectively assessed need);
- ? Justified (based on proportionate evidence);
- ? Effective (deliverable over the plan period); and
- ? Consistent with national policy (enabling the delivery of sustainable development).

All representations are required to be submitted to the planning inspectorate for the examination in public along with the revised local plan and supporting evidence.

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Pocket has delivered over 1,000 homes across the Capital and has over 1,500 more in planning and construction (Figure 1). The homes are popular with first time buyers and currently Pocket has a list of over

18,000 Londoners who have expressed an interest in buying a Pocket home in the next 12 months. The average annual income of a buyer is less than c.£40k. The average age of a Pocket buyer is 32 and 90% are single. 40% of Pocket buyers are key workers.

Pocket believes its affordable homeownership offer could play an important role in the London Borough of Wandsworth. Pocket has constructed one scheme in the Borough and is actively seeking opportunities to acquire land for new schemes.

Where delivered in Wandsworth Pocket Living Housing would be significantly more affordable than alternative one-bedroom private sale and private rent homes. The savings required for the deposit would also be substantially lower for a pocket home compared to a private sale home.

The delivery of Pocket homes in Wandsworth could therefore meet the needs of many of the local single person households who are unable to afford to buy a home in many parts of the borough (house prices are now many times incomes) but would not be eligible for social/ affordable rented housing (meeting an unmet intermediate affordability gap). This would complement the delivery of other single person products such as co-living as illustrated below (exact income will vary by location).

Policy support for a pipeline of Pocket Living affordable housing particularly on smaller more constrained sites (that would otherwise be unlikely to come forward and/or provide any affordable housing) provides a basis for the Council to avoid the need to require First Homes in every individual scheme. Requiring the delivery of First Homes on every site will constrain scheme viability, management feasibility, deliverability and ultimately the number of low-cost rent homes that can be provided during the plan period.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>

Proposed Change	No change considered necessary.
Consultee Full Name	Unite Group Plc
Consultee Organisation Details	
Agent Full Name	Matthew Roe
Agent Organisation Details	Director ROK planning
Comment ID	613
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>REPRESENTATIONS TO THE LONDON BOROUGH OF WANDSWORTH 'PUBLICATION' DRAFT LOCAL PLAN (REGULATION 19) (JANUARY 2022) ROK PLANNING ON BEHALF OF UNITE GROUP PLC</p> <p>I write on behalf of our client, Unite Group Plc (Unite), to submit to submit representations to the London Borough of Wandsworth (LB Wandsworth) 'Publication' Draft Local Plan (Regulation 19) (January 2022).</p> <p>Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes for around 74,000 students in more than 177 purpose-built properties across 27 of the UK's strongest university towns and cities.</p> <p>The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. The 'Publication' Draft Local Plan (the draft Local Plan) is the final draft of the Local Plan produced by the Council before it is submitted to the Planning Inspectorate (PINS).</p> <p>Unite wish to make representations to the following policies:</p>

- Policy LP28 – Purpose-built student accommodation;
- Policy LP29 – Shared living;
- Policy LP30 – Build-to-rent;
- Policy LP35 – Mixed-use development on economic land; and
- Policy LP51 – Parking.

These representations are set out in the remainder of this letter.

I trust the above representations are in order and look forward to confirmation of their safe receipt. Given the nature of our comments and the points and evidence raised throughout this representation in relation to a number of issues, I reserve the position to further amplify these representations and participate in the Examination in Public as necessary.

Please do not hesitate to contact myself or Daniel Botten (daniel.botten@rokplanning.co.uk) should you have any queries or wish to discuss these.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Unite Group Plc
Consultee Organisation Details	
Agent Full Name	Matthew Roe
Agent Organisation Details	Director ROK planning
Comment ID	614
Title	LP28 Purpose Built Student Accommodation
Number	Policy 39
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy

Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP28 – Purpose-built student accommodation</p> <p>Policy LP28 ‘Purpose-built student accommodation’ (PBSA) states that:</p> <p><i>“A. Proposals for Purpose-Built Student Accommodation will be supported where the development:</i></p> <ol style="list-style-type: none"> <i>1. meets all requirements for student accommodation, including affordable provision through the threshold approach, as set out in London Plan Policy H15;</i> <i>2. is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth; or within a reasonable travelling distance of Wandsworth;</i> <i>3. is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood.</i> <i>4. has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;</i> <i>5. would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure;</i> <i>6. provides a high-quality living environment, including the provision of appropriate space standards and facilities, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and</i> <i>7. provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users.”</i> <p>Unite make comment on points 2, 5 and 7 in turn below.</p> <p><i>2. is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth; or within a reasonable travelling distance of Wandsworth</i></p> <p>Unite make comments on point 2 as follows:</p> <ol style="list-style-type: none"> 1. It is entirely unclear why the policy seeks evidence of a linkage with one or more HEP in Wandsworth, or within reasonable travelling distance of Wandsworth, specifically The borough is well-located and well-connected, particularly at its north-east border with Lambeth; 2. Indeed, this specificity is directly contradictory to the London Plan, which states at paragraph 4.15.3 that <i>“there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed”</i>; 3. No justification is provided for the departure from the London Plan either within the draft policy or within the supporting text to the draft policy; 4. Indeed, it is notable that the draft Westminster City Plan original contained a similar policy clause, with policy 11 stating at point G that PBSA would only be supported <i>“for students studying at higher education institutions with a main hub in Westminster”</i>. Following Unite’s participation at the Examination in Public (EIP) for this plan, the Inspector’s recommended this sentence be removed in its entirety in order for the policy to be found acceptable. It is argued the same conclusion must be reached in this instance. <p>Recommendation: The latter half of point 2. be deleted in accordance with the London Plan approach.</p>

5. would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure

Unite make comment on point 5 as follows:

1. There is no tangible evidence to suggest that concentrations of PBSA cause harm to the balance or mix of uses in an area, cause additional pressure on local infrastructure or harm local communities. PBSA properties are managed and controlled and occupiers are required to abide by the obligations set out within Student Management Plans required at application stage, as required by point 3 of draft policy LP28;

2. The PBSA market is mature and well-managed. Considerations of over-concentration conflates PBSA development with uncontrolled HMO accommodation, which is a markedly separate housing product and is entirely unjustified;

3. PBSA is a form of housing. National guidance in fact states that *“all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply”* (NPPG, Paragraph: 034 Reference ID: 68-034-20190722). In addition, the NPPG also states that *“encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock”* (Paragraph: 004 Reference ID: 67-00420190722). Given PBSA is a recognised form of housing, it is not considered sound to unduly restrict concentrations of this form of housing specifically;

4. In any case, no threshold is provided for what will be considered to constitute an over-concentration. It is noted within supporting paragraph 17.35 that schemes will be considered on a site-by-site basis. The policy makes reference to the ‘neighbourhood level’ which is defined within the glossary to the draft plan as *“areas within a 800m radius from the site”*. Beyond this, no guidance is provided as to the methodology for defining an over-concentration;

5. Indeed, it is argued that it is not possible to define an over-concentration. There are various appeal cases across the country where varying levels of student concentrations have been found acceptable. This includes:

- o Wilder Street, Bristol (APP/Z0116/W/18/3212806) - 34% student population found not to be harmful;
- o Small Street, Bristol (APP/Z0116/W/18/3194372) – 37% student population found not to be harmful;
- o Lower Albert Street, Exeter (APP/Y1110/W/17/3178667) – 32% student population found not to be harmful;
- o Selly Oak, Birmingham (APP/P4605/W/21/3275570) – Increase from 36% to 44% student population found not to be harmful;
- o The Old Printworks, Edinburgh (PPA-230-2122) – 60% student population found not to be harmful;
- o Salisbury Court, Edinburgh (PPA-230-2146) – 62% student population found not to be harmful.

6. It is notable that the London Borough of Lambeth include a similar restriction on over-concentration within their adopted policy H7. Unite similarly objected to the inclusion of this restriction at the EIP for the Lambeth Local Plan which ultimately led to the removal of the originally stipulated 500m radius;

7. Furthermore, the supporting text to draft policy LP28 acknowledges at paragraph 17.33 that *“insufficient provision for university students could place additional pressure on the lower end of the private rented sector (PRS), and therefore it is important that provision is made for new facilities close to their places of study in order to cater for existing and projected increases in demand”*. It similarly notes that *“inadequate local provision, with students having to travel long distances to attend college, would also be contrary to sustainable development principles”*;

8. Moreover, paragraph 317.36 continues to state that PBSA should be *“directed to well-connected locations with good level of access to public transport (PTAL 4 or higher), including those supported by good walking and cycling infrastructure. It is also important that Purpose-Built Student Accommodation is sited so student residents have access to a wide range of services and facilities within a 15-minute walking distance”*;

9. The imposition of over-concentration restrictions is directly contrary to these statements. Restricting concentrations of PBSA will prevent this form of accommodation from being located in appropriate areas (i.e. those well-located in terms of access to universities/colleges themselves and to public transport), leading to either the dispersal of PBSA in less appropriate areas in order to meet demand, or the inability to meet demand;

10. Given the above it is considered entirely unsound to seek to restrict concentrations of PBSA where no evidence is provided to justify the perceived harmful impact this would have.

Recommendation: Point 5. should be removed in its entirety.

7. provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users

Unite make comment on point 7 of policy LP28 as follows:

1. The requirements for conventional residential accommodation should not be applied to student housing as, in reality, the typical demand from students per annum falls significantly below the 10% ma This is a steady and consistent trend as evidenced by Unite's longer term experience;

2. Indeed, Unite have over 117 PBSA properties across the UK with 27 buildings in the London portfolio. Of these c.9,500 bedrooms, they have provision for 528 students that may need a wheelchair roo This is over 5.5% of the total London rooms. Over the last 5 years, Unite have provided 41 students with these rooms. For the 2018-2019 academic year, Unite had 7 students in need of wheelchair sized rooms out of an approximate total of c.9500 bedrooms. This equates to a 0.07% take up and thus demonstrates the exceptionally low need for accessible bedrooms;

3. The majority of wheelchair students are housed by the universities close to campus for ease of travel;

4. The 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage of those who have a disability and require wheelchair accessibility is far greater than the demographic affiliated with student accommodation. The normal age range of students is between 18 and 25, explaining why there has never been a shortfall in wheelchair provision within student housing;

5. It is notable that paragraph 17.38 of the supporting text to policy LP28 states that to "ensure conformity with the London Plan, proposals for Purpose-Built Student Accommodation will be required to provide [...] adequate proportions of affordable and wheelchair accessible/easily adaptable student accommodation";

6. However, the London Plan (Policy D7) clarifies that the 10% requirement for wheelchair accessible rooms relates only to dwellings which are created via works to which Part M volume 1 of the Building Regulations applies – i.e., to new build dwellings. PBSA developments do not constitute dwellings and therefore the 10% requirement does not apply to these developments. This was confirmed within the Inspector's report to the London Plan. On this basis, the 10% requirement proposed by draft policy LP28 is in fact in conflict with the draft London Plan;

7. Indeed, following Unite's participation in the Local Plan process, further London Boroughs have followed that of the London Plan. This includes Tower Hamlets and Southwark which have both reduced the requirement from 10% (as originally proposed) to 5% of student rooms to be provided as accessible; and

8. In any case, Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all poli Indeed, should individual bedrooms need to be adapted; this can be done quickly and relatively easily to meet requirements. Unite have undertaken such additional alterations in discussion with the end user and provided a bespoke solution to a student's needs.

Recommendation: The 10% requirement should be removed and accessible requirements should instead defer to building regulation requirements of 1% fitted out with a further 4% adaptable.

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>Whilst there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed, the Local Plan ensures that the occupiers of the development have an opportunity to get to the educational establishment it is linked to. This is necessary to ensure that students are not disadvantaged by unreasonable travel times and disproportionate travel costs. Reference to establishments within or close to Wandsworth is therefore justifiable. The policy does not limit the agreement only to Wandsworth.</p> <p>Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services</p> <p>The London Plan provides for 10% of new-build units to be wheelchair user dwellings. This applies to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies which, at the time of its publication, generally limits the application of this policy to new build dwellings.</p> <p>Whilst this may not apply to PBSA, there is no recommendation for wheelchair user accommodation within either London Plan Policies D7 or H15. In light of this, and the possibility that student accommodation may change its use to regular accommodation, requiring a 10% proportion of student rooms readily adaptable for occupation by wheelchair users is not considered to be unreasonable.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Unite Group Plc
Consultee Organisation Details	
Agent Full Name	Matthew Roe
Agent Organisation Details	Director ROK planning
Comment ID	615
Title	LP29 Housing with Shared Facilities
Number	Policy 40
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy LP29 – Housing with Shared Facilities

Policy LP29 Housing with Shared Facilities states at part C and D in relation to large scale purpose-built shared living that:

“C. Development proposals for large-scale purpose-built shared living accommodation which is defined as being a ‘sui generis’ use will generally be resisted. Such accommodation will only be permitted where:

- 1. it is proposed on a site which is not suitable for conventional housing;*
- 2. it is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and*
- 3. it would not lead to an overconcentration of single-person accommodation at the neighbourhood level.*

D. Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must:

- 1. meet criteria A1-A10 of London Plan Policy H16;*
- 2. demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and*
- 3. provide a financial contribution towards the provision of affordable housing in the borough, in accordance with the London Plan.”*

Unite raise objection to the general resistance towards purpose built shared living as set out in Part C for the following reasons:

1. The London Plan identifies that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or

HMOs and provides a policy basis for this form of development in the form of policy H16. The London Plan therefore provides a policy basis for shared living development, in contrast to draft policy LP29's approach of general resistance;

2. With regards to point 1. of part C of draft policy LP29, large scale shared living development is in fact a form of housing that can contribute to housing supply. Indeed, it is argued that shared living can contribute to freeing up conventional residential properties for families which would otherwise be occupied as a HMO in the same way as PBSA, as acknowledged in the supporting text to draft policy LP28 and national planning guidance;

3. Supporting paragraph 17.45 to draft policy LP29 states that *“It is inevitable that any form of housing will somehow contribute to meeting housing need or demand in the borough; however, given that the borough continues to face intense development pressures from different competing land uses, it is important to protect scarce land for housing which is best suited to meeting the local need”*. The acceptance within this statement that shared living can contribute to meeting housing needs is not reflective of the general resistant approach taken by the policy. Furthermore, it should be noted that shared living developments can often be built to much higher densities than conventional residential accommodation and thus serve to meet housing needs more efficiently on constrained sites;

4. Furthermore, supporting paragraph 17.43 states that *“large-scale purpose-built shared living accommodation which is defined as a ‘sui generis’ use does not provide an alternative route to affordable housing to people on lower quartile incomes”*. However, this form of development is required to contribute to the provision of affordable housing via financial contribution in accordance with the London Plan. In addition, there is potential to include discounted-market rent units within shared living developments in similarity with build-to-rent developments, thus providing a further avenue towards affordable accommodation provision;

5. With regards to point 3. of part C of draft policy LP29, the points made earlier in this letter in response to point 5. of draft policy LP28 are relevant. Shared living is best located in sustainable areas close to local facilities and with good public transport accessibility, and thus restricting this form of development in terms of its concentration in specific areas is counter intuitive.

	<p>Furthermore, there is no evidence nor policy basis to demonstrate that an over-concentration of such development would lead to measurable harm beyond that of similar concentrations of conventional housing products and thus point 3. of draft policy LP29 is considered entirely unjustified;</p> <p>6. In addition, shared living provides numerous benefits including the creation of mixed and balanced communities in a controlled environment protecting surrounding residential amenity in the form of a management plan (in contrast to uncontrolled small HMO's which would otherwise be required to meet this housing need).</p> <p>Whilst the objections above are raised to part C, Unite support the inclusion of points 1. – 3. Of part D in accordance with policy H16 of the London Plan.</p> <p>Recommendation: The general resistance to shared living schemes should be removed. This form of development should instead be supported where it meets the requirements of policy H16 of the London Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy is set out as being restrictive because the Local Housing Needs Assessments prioritises the need for more traditionally composed housing , rather than shared housing. The policy is, however, clear in the circumstances where co-living would be acceptable, and this is set out in the remaining criteria (C.1 to C.3)</p> <p>In respect of criterion C.1, the supporting text provides clarity for how this element should be applied at para 17.44.</p> <p>Given the demonstrable need in the borough for more conventional housing to meet need, the policy seeks specific information to justify co-living schemes, and the supporting policy text provide the basis for assessing this at para 17.45.</p> <p>The statement at para 17.43 is making a point about the nature of the sui generis, co-living housing, not one about the financial contribution that might be made to affordable housing outside of the development. In general terms, discounted market sale housing and co-living development does not offer an alternative route to affordable housing to those on lower quartile incomes, which is the type of household specifically referenced.</p> <p>Over-concentration will be assessed on a site by site basis within the 800m definition of the neighbourhood. Applications will vary in the volume of units proposed and the location relative to similar schemes. This will also change through time. The Council will apply a test of over-concentration where genuine concerns are raised in respect of a scheme, particularly where permanent residential occupiers can demonstrate a detrimental impact on the accessibility and availability of essential local services. Further information regarding this criterion is provided at para 17.46.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Unite Group Plc
Consultee Organisation Details	
Agent Full Name	Matthew Roe
Agent Organisation Details	Director ROK planning
Comment ID	616
Title	LP30 Build to Rent
Number	Policy 41
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP30 states that:</p> <p><i>“A. Development proposals for Build to Rent housing must follow the policy approach set out in London Plan Policy H11, subject to the following additional requirements:</i></p> <ol style="list-style-type: none"> <i>1. Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Fast Track Route, 50 per cent of the overall affordable housing requirement should be provided as low-cost products within this separate core and/or block, with the remaining 50 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If the above requirements are not met, the scheme must follow the Viability Tested route. In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole.</i> <i>2. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design terms to include a separate residential core and/or block in the development proposal, the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy H11. To follow the Fast Track Route, the Council will seek 30 per cent of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If these requirements are not met, the scheme must follow the Viability Tested route.</i> <i>3. Build to Rent housing should provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).”</i> <p>Unite object to this policy on the following basis:</p> <ol style="list-style-type: none"> 1. Draft policy LP30 states that proposals for build to rent housing should follow the policy approach set out in London Plan policy H11. However, it then introduces requirements which directly contradict the approach set out by policy H11;

	<p>2. Policy H11 is clear that “where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level”. Thus, requiring developments to meet the criteria of Part B of policy H11 whilst also requiring the delivery of low-cost rented housing to be managed by a registered provider is considered to conflict;</p> <p>3. Supporting paragraph 17.51 of draft policy LP30 states that “The Council’s preference is to secure low cost rented housing where possible through schemes involving Build to Rent by including this in a separate core and/or block managed independently by a registered provider of affordable housing”. It continues to state that “the onus will be on the applicant to explain the design reasons why it is not feasible to provide a separate core and/or block for low cost rented housing. Only where this has been demonstrated to the satisfaction of the Council, will it be acceptable to provide the full affordable housing requirement as discount market rented accommodation managed alongside the market rented accommodation”. This is considered to go against the onus of the London Plan which states that “Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes”; and</p> <p>4. The benefits of providing DMR units should also be noted. As no separate core is required, better integration between DMR and market rent units can take place in comparison to low-cost rental accommodation. Likewise, a key benefit of build-to-rent, as acknowledged by paragraph 4.11.1 of the London Plan, is that it can accelerate delivery of housing on individual site This delivery is likely to be impacted where applicants are required to demonstrate that secondary cores are not feasible as opposed to simply following the London Plan approach.</p> <p>Recommendation: Draft policy LP30 should be amended to require proposals for build-to-rent developments to follow the approach set out in policy H11 of the London Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>The supporting text sets out the Council's preference, where possible, to secure low cost rented housing through BtR schemes, allowed for by London Plan para 4.11.10. Under these circumstances, criterion A.1 would apply, and reference to an RP is relevant and necessary, alongside the reference, in design terms, to a separate block which is designed to aid management.</p> <p>The policy is considered to be clear in its approach to the BtR sector and positively worded. London Plan policy H11 is clearly referenced as a starting point, but the Council seeks to determine locally relevant criteria as allowed for within the London Plan.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Unite Group Plc
Consultee Organisation Details	
Agent Full Name	Matthew Roe
Agent Organisation Details	Director ROK planning
Comment ID	617
Title	LP51 Parking, Servicing and Car Free Development

Number	Policy 62
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP51 – Parking</p> <p>Policy LP51 states that: <i>“A. Development will be supported where:</i> 1. <i>Cycle Parking is provided in accordance with the minimum levels set out in the London Plan with reference to Table 10.2 and any subsequent amendmen The parking must be easily accessible, secure, and well-located to the unit it is associated with.”</i></p> <p>For PBSA and Shared Living, the requirements set out in Table 10.2 are as follows:</p> <p>Long Stay Short Stay PBSA 0.75 spaces per bedroom 1 space per 40 bedrooms</p> <p>Shared Living</p> <p>1 space per bedroom • 5 to 40 dwellings: 2 spaces • Thereafter: 1 space per 40 dwellings</p> <p>Unite make comment on these standards as follows:</p> <p>1. Unite’s evidence shows that cycle parking provision provided at policy complaint levels is severely underused. Enclosed within Appendix A is supporting evidence which refers to a survey (February 2018) undertaken by Unite. The study demonstrates that the maximum average demand for cycle parking storage is 5% of bed places, which has been found across the 26 of Unite’ sites which equates to a demand of one cycle space per 20 students;</p>

2. Over-provision of unnecessary cycle space can lead to loss of valuable floorspace in which more bedrooms can be provided, thus reducing the efficiency of the use of the land. By way of an example, Unite were required to provide a minimum of 423 cycle spaces for a student scheme in the London Borough of Islington which translates to a floor area of approximately 465 sqm or 385 sqm based on the typical requirements of 1.1sq.m for a Sheffield stand or 0.91sq.m for a dual-stacking system respectively. Based on an average student cluster bedroom size of approximately 11sq.m, this would result in the unnecessary loss of approximately 35-42 bedroom units;

3. An increase in the provision of cycle parking for student accommodation does not directly result in an increase in cycling patterns amongst student. Student housing schemes are generally in close proximity to places of study allowing the majority of journeys to be undertaken on foot. Furthermore, they are in areas with high levels of public transport accessibility providing an alternative means of transport;

4. The emergence and take up of cycle hire schemes and/or pool bikes provide an affordable means of transport, precluding the requirement for private cycle ownership and storage which eliminates the need for students to invest in safety, security and maintenance associated with private ownership. Indeed, Unite would support the use of pool bikes in PBSA schemes where this, in turn, allows for a reduction in the number of dedicated cycle spaces to be provided on site. By way of example, following Unite's participation in the EIP to the new Lambeth Local Plan and production of a Statement of Common Ground with the Council, a similar principle has been incorporated as a main modification. Specifically, MM107 proposes to update policy T3(e) to read: *"In purpose-built student accommodation schemes, part of the required cycle parking provision could be provided as pool bike. For other types of development, pool bike provision is encouraged in addition to the cycle parking requirement"*;

5. Student housing and shared living accommodation is developed at higher densities than conventional housing. As a consequence, and in order to provide the required levels of cycle parking, large areas of floorspace (typically at ground floor level) are lost. These areas could otherwise be used more efficiently and effectively for living space or town centre uses, providing numerous benefits to a scheme including increasing their viability.

It should be noted that Unite support the use of cycles as a sustainable means of transport, but argue that pool bikes and similar schemes are a more efficient method of encouraging cycling amongst students whilst preventing large areas of floorspace from being lost and thus ensuring efficient use of the land.

Recommendation: Given the above evidence, it is considered that a 25% provision of cycle parking for student housing should be required. Alternative means of cycling, including pool bikes, should be considered to meet cycle parking needs for PBSA and shared living.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	LP51 Parking, Servicing and Car-free development is consistent with the London Plan requirement for cycle parking. Hire cycles are not considered a suitable alternative to cycle parking as they serve different purposes.
Proposed Change	No change considered necessary.
Consultee Full Name	Unite Group Plc
Consultee Organisation Details	
Agent Full Name	Matthew Roe

Agent Organisation Details	Director ROK planning
Comment ID	618
Title	LP35 Mixed-Use Development on Economic Land
Number	Policy 46
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP35 – Mixed-Use Development on Economic Land</p> <p>Policy LP35 sets out the approach to mixed-use development on industrial land outside of SILs and LSIA's in accordance with policy E7 of the London Plan. Policy LP34 states that proposals for mixed- use development, including residential, in these areas will be supported where:</p> <p><i>“1. industrial, storage or distribution floorspace is provided, in accordance with Policy LP35 (Mixed Use Economic Development on Economic Land), and where all other relevant criteria of this policy have been met; or</i></p> <p><i>2. there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of this policy, as demonstrated through the submission of evidence that a full and proper marketing exercise of the site, for a period of at least 18 months, has been undertaken in line with the requirements set out at Appendix 1 of this Plan.”</i></p> <p>Policy LP35 provides further detail on the policy approach if route 1 above is proposed. In all circumstances, either full re-provision or intensification of existing industrial uses is required. Unite argue that, as per route 2 of part D. of policy LP34, where there is no reasonable prospect of the site being used for employment purposes in its entirety, a reduced provision can be supported under draft policy LP35. This would accord with paragraph 82(d) of the National Planning Policy Framework which states that planning policies should <i>“be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”</i>.</p> <p>Recommendation: Policy LP35 should be updated to support a reduction in employment floorspace as part of mixed-use schemes where it can be demonstrated that there is no reasonable prospect of the full quantum of existing floorspace being used for employment purposes in its entirety.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	

Council Response	Comment noted. The Local Plan sets out a clear approach for the protection or intensification of economic uses in the various designations identified in LP35. This is considered necessary in order to address meeting the identified need of 35,700 sqm of core industrial uses (or its land equivalent of 5.5 ha), as well as up to 2.1 ha of land to accommodate additional waste demand. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This approach is considered to be consistent with the NPPF requirement, set out in paragraph 82, that Local Plans should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" and "set criteria, or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period". A degree of flexibility, in accordance with NPPF paragraph 82.d, is introduced through in LP33.E.3 (with respect to offices) and LP34.D.2 (with respect to industrial land) for the change of use of the land should there be no reasonable prospect of the continued use of the site for economic uses. Should redevelopment proposals come forward in EUPA and EUJA that provide economic floorspace, but in reduced quantum than the existing, these would not be acceptable with respect to this policy and would therefore need to be appropriately justified (including through the submission of evidence). These would need to be assessed on a case-by-case basis (through the development management process).
Proposed Change	No change considered necessary.
Consultee Full Name	Pocket Living
Consultee Organisation Details	Pocket Living
Agent Full Name	Mr Thomas Hatch
Agent Organisation Details	Quod
Comment ID	620
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>SDS1 Spatial Development Strategy 2023 - 2038</i></p> <p>SDS1 Density</p> <p>Policy SDS1 and the supporting text should be amended to specifically reference material support for the delivery of higher densities in accessible locations with a focus on smaller unit types on more constrained sites.</p> <p>Sites located in central locations or close to transport interchanges are highly suited to increased densities of housing and people. They are typically however less suited to families. The delivery of smaller unit sizes, such as 1</p>

bedroom 1 person homes, will therefore be vital for maximising housing density on these sites and ensuring the plan is **effective**. Pocket's density led solution would support this policy objective.

SDS1

Constrained Sites

Policy SDS1 and the supporting text should be amended to specifically reference material support the delivery of new homes, particularly affordable homes, on smaller more constrained sites.

Wandsworth's London Plan target is for 4,140 homes to be delivered on small sites over the plan period. Smaller sites are however typically more constrained than larger sites. It is also more challenging to deliver affordable housing on these sites due to management feasibility issues associated with a

single core. Policy should therefore provide strong material

support for proposals on these sites, particularly those which include affordable housing, to ensure the plan is **effective**. Pockets model of delivering up to 100% affordable housing on small-constrained sites would support this policy objective.

SDS1

SME Developers

Policy SDS1 and the supporting text should explicitly recognise the need to support SME developers in Wandsworth.

The importance of supporting SME developers to widen housing choice and encourage innovation in housing delivery

is evidenced the Letwin Review (2018) and more recently in the Government's consultation 'Planning for the Future' (2021). Providing material support for SME's is essential for ensuring the plan is **effective**. This is also recognised in

London Plan Policy H2 which encourages innovation on smaller sites with SMEs.

SDS1

Affordable Home Ownership

Policy SDS1 and the supporting text should explicitly reference the need to significantly increase the delivery of affordable ownership homes and include a presumption in favour of schemes with are largely (75%+) this tenure.

The NPPG confirms (Paragraph: 020 Reference ID: 2a-020-

20190220) was updated in February 2019 to confirm that the un-met need for affordable housing need must include 'those that cannot afford their own homes, either to rent, **or to own**, where that is their **aspiration**' (our e mph as is) .

The Councils SHMA confirms 'The accepted understanding of this requirement is that plan-makers now need to quantify need for tenures that offer an affordable route to home- ownership' and 'The calculation as to how many households will require AHO products is therefore derived from the number of households who earn enough to rent privately, but not enough to buy'.

The SHMA however underestimates the number of households in this group by estimating that there is presently only a backlog of need of 2,536 households. The latest Census showed there were 27,169 households living in the private rented sector in LBW. Research conducted by the British Attitudes Survey identified 87% of renters aspired to buy nationally. Pocket Living's own research for London (Annex 3) identified a figure of 73%. The lower figure (73%) suggests there are at least 19,833 households who rent but aspire to buy. The actual figure is likely to be higher given i) the expected increase in numbers living in the private rented sector since the 2011 Census; and ii) the fact multi person households (unrelated adults who share) are only counted as a single household (but individually aspire to buy). It is not clear how the SHMA arrives at a figure of just 2,536 households.

Notwithstanding the approach taken, it is also not clear how the Draft Local Plan seeks to meet the total need identified of 22,461 affordable ownership homes (including future needs) over the plan period.

The plan has **not** therefore been **positively prepared** to meet Wandsworth's objectively assessed needs, is **not justified** by proportionate evidence and is therefore **not consistent with national policy**.

Providing material policy support for affordable home ownership with a presumption in favour of schemes which are largely (75%+) affordable home ownership (particularly on smaller more constrained sites which may otherwise come forward or yield any affordable housing delivery) is supported by Policy H5 of the London Plan. It is critical for encouraging and accelerating the delivery of new affordable homes and meeting unmet local housing need. Its inclusion will therefore ensure the plan is **effective**. Pocket's model would support this policy objective.

SDS1

Young Single Persons

Projected growth in the number of single person households is identified in the Council's SHMA evidence base.

Policy SDS1 and the supporting

text should explicitly recognise the need to support young single persons by providing purpose- built self-contained housing for single person households.

This cohort typically comprises younger single persons who have been forced to live in low quality overcrowded or otherwise unsuitable shared rental housing. The problems associated with this type of housing have been highlighted by the COVID19 pandemic which illustrated those living in shared rental housing have on average just 10 square meters of private space to live and work from (LSE 2020 – Annex 1). These households are largely aspiring first time buyers who cannot afford to buy locally within a reasonable travel to work time and are increasingly leaving the borough (creating challenges for local businesses and the delivery of frontline services). Demand for shared rental housing increases pressure on the sharing of homes otherwise highly suitable to families as noted in H10 the London Plan. This is why the GLA count single person homes delivered in student accommodation and co-living towards housing targets.

Providing material policy support for housing which meets the needs of young people will ensure the plan is much **more effective** in meeting objectively assessed needs. Pockets model would support this policy objective.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The policy is a strategic policy setting out requirements for housing at a high level. Detailed comments regarding development of small sites is set out at Policy LP7. A cross reference between SDS1 and LP7 would make this clearer.</p> <p>The Objectively Assessed Need figure is an unconstrained figure based on the Standard Methodology i.e. it does not take account of land supply, availability of developable land, other constraints such as designated parks and open spaces and the character of an area.</p> <p>Reference to small and medium developers, a strategic priority for the London Plan, is covered by London Plan policy H2. Implicit within this concept is the idea that they could be developed by a range of interests. No change is required in this case.</p>

	<p>The plan recognises the needs of single, younger people through policies which aim to reflect the findings of the LHNA, and through the range of policies which ensure a good housing mix (LP24) and intermediate housing suitable for this cohort. The plan also promoted the development of smaller sites through LP7.</p> <p>Affordable housing is dealt with at Policy LP23. Policy SDS1 deals with the strategic delivery of land uses and the distribution of this. It is not appropriate to set out affordable housing targets at SDS1.</p>
<p>Proposed Change</p>	<p>Amend the third sentence within criterion (A) to read,</p> <p>'The small sites provision across the entire Plan period will account for a minimum of 414 new homes per year (<i>see also Policy LP7</i>)'.</p> <p>Edit para 14.46 to read, 'The London Plan sets out a 'small sites' housing requirement for each borough, <i>which is reflected in this Plan at Policy SDS1</i>. Small sites are defined as those that are less than 0.25hectares.'</p>

Consultee Full Name	Pocket Living
Consultee Organisation Details	Pocket Living
Agent Full Name	Mr Thomas Hatch
Agent Organisation Details	Quod
Comment ID	621
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP23C</p> <p>Tenure Mix Effectiveness</p> <p>Policy LP23C and the supporting text should be amended to specifically recognise that it may not always be possible, appropriate or most effective to require every site and/or type of scheme and/or developers to provide a mix of tenures.</p> <p>The Council's housing evidence base acknowledges that there is an un-met need for all types and tenures of housing in Wandsworth. Arbitrarily requiring every site/ scheme to attempt to meet every type of unmet need is not always possible, appropriate or effective in meeting needs.</p> <p>For example, it is not always possible for smaller more constrained sites to provide a mix of tenures due to management feasibility issues associated with a single core. It is also not always appropriate for these sites to provide low cost rented homes for families due to the living environment and/or access to open space etc. Finally, requiring a mix of tenures in small schemes can negatively impact efficiency/ viability and the number of affordable homes that can be delivered.</p> <p>A more effective approach would be to support higher levels of low cost rented homes on larger sites (that can accommodate family housing) and intermediate homes on smaller constrained sites (typically delivered by SME developers who specialise in one housing type such as Pocket).</p> <p>LP23C</p> <p>First Homes</p> <p>Policy LP23C and the supporting text should be amended to remove the blanket requirement for First Homes in every scheme and reference to a fixed 30% discount. The approach should be determined on a case-by-case basis subject to unit size and location.</p> <p>Policy LP23C should also be amended to include specific support for a small pipeline of schemes which are solely affordable home ownership, in lieu of arbitrarily requiring First Homes in every individual scheme</p>

The inclusion of first Homes in lieu of Low-Cost Shared

Ownership will have a negative impact on scheme viability. This will reduce the ability of individual schemes to deliver affordable housing including low cost rented tenures. The inclusion of a first homes requirement on all sites would not therefore be **effective** in meeting objectively assessed needs.

The Council's First Homes evidence identifies a range of discounts required for different unit sizes ranging from 12-

22% for 1 beds to 39-56% for 4 beds (subject to the incomes required). It also notes that the discount required will vary by location (1.3) and that greater discounts have implications for viability (1.32). This supports determining the relevant discount on a case-by-case basis having regards to a range of factors.

The **justification** for a case-by-case approach (instead of a blanked requirement) would be more robust if the plan included material policy support for a pipeline of schemes on smaller sites which are largely (75%+) affordable home ownership schemes (as defined by Annex 2 of the NPPF). Supporting these schemes on smaller more constrained infill site; sites (which are less likely to otherwise come forward for housing and/or deliver any on-site affordable housing due to management feasibility) will also ensure these homes are net additional and do not displace cross subsidised low cost rented homes. Enabling flexibility for these homes to be First Homes or any other type of affordable housing defined by Annex 2 of the NPPF will increase the number of suitable/ experienced providers (including Pocket Living).

LP23C

Tenure Mix Exemption Policy

LP23C should be amended to include an exemption to any other specific tenure split requirements where the large majority (75%+) of housing is proposed as affordable housing (as defined by Annex 2 of the NPPF). It should confirm that in these circumstances viability evidence will not be required. Flexibility in respect of tenure mix for LP23C schemes providing 35-74% affordable housing in accordance with the London Plan is supported. Policy H5 London Plan however also provides an additional route to incentivise schemes providing 75%+ affordable housing by permitting any tenure mix. The supporting text at 4.5.10 confirms "To incentivise schemes with a high proportion of genuinely affordable housing, schemes that propose 75 per cent or more genuinely affordable housing may be considered under the Fast-Track Route whatever the affordable housing tenure mix, where supported by the borough and, where relevant, the Mayor. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved." Encouraging the delivery of schemes in which the large majority of homes (75%+) are affordable homes is important for increasingly and accelerating the delivery of new affordable homes and meeting unmet local housing need. Requiring these very important schemes to provide multiple tenures would make them less viable/attractive for Registered Providers and other SME affordable housing providers such as Pocket. Attempting to require every scheme to meet every type of housing need (regardless of the nature of the site, proposal or developer) is likely to result in a reduction in housing delivery reducing the effectiveness of the plan. It is likely to lead to friction between the deliverability of sites and policy requirements which inevitably will lead to delays. Proposals for a high proportion (75%+) of this type of affordable housing should therefore be afforded strong policy support to encourage their delivery regardless of the overall mix of tenures proposed. The positive role small sites can have in increasing housing delivery is strongly supported by Litchfields research at Annex 2.

LP23-F

Tenure Management Policy

LP23-F and the supporting text should be amended to recognise that other intermediate tenures (including Discounted Market Sale) are not required to be managed by a Registered Provider. There is no statutory requirement for intermediate tenure homes (including Discounted Market Sale) to be owned and/or managed by a Provider of Affordable Housing who is regulated with the Social Housing Regulator ('Registered Provider'). This is confirmed in the NPPF and the CIL regulations. Requiring intermediate homes to be managed by an RP would exclude many SMEs such as Pocket from investing in the delivery of new affordable homes. This is contrary to national policy objectives for diversifying housing delivery and will ultimately reduce the delivery of affordable housing making the plan less effective over the plan period.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.

The policy clearly sets out the Council's requirement for a provision of 50% low cost rented housing in accord with the London Plan ambition, and its tenure split, set out at policies H4 and H6. Evidence suggests that this is a realistic target. Changes are made to the policy to seek a balance of intermediate products based on the low-cost rent element achieved.

First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Changes are made to the supporting text to Policy LP23 to explain this. Uncertainty exists as to the deliverability and viability of First Homes throughout the borough, and no First Homes have been secured in the borough to date. Given this uncertainty, it is agreed that a requirement for First Homes should be removed from the policy, and instead rely upon the reference to First Homes in national policy.

Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability.

It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. So therefore, it is considered that flexibility should be introduced into the wording to seek a balance of intermediate products - which should include First Homes - after the agreement of the low cost rented element, which would reflect those differing circumstances on sites across the borough.

As stated at para 17.12, the Council's priority is genuinely affordable housing in accord with the London Plan and the Local Housing Needs Assessment. It also states that other intermediate products will be considered provided it can be demonstrated that local housing need will be met.

Further, the plan should be read as a whole. Criterion (e) of LP24 ensures that the policy is applied on a site by site basis and considers context, need and viability.

Policy LP23 does not specifically exclude this exception (for schemes with over 75% affordable housing). Scope exists within the London Plan to address this aspect of flexibility within the provision of affordable housing, but the London Plan is qualified by stating that this flexibility is also at the borough's discretion (i.e. 'where supported by the borough'). This can therefore be applied on a case-by-case basis, but should have regard to the overall aim of prioritising genuinely affordable housing and a 50% proportion of social rented housing.

Introduction of 'at least' prior to the provision of 50% low cost housing stems from representations made elsewhere.

It is not expected that discounted market sale products would be managed by a registered provider. By their nature, 'sale' suggests that the ownership goes to the purchaser. The criterion would benefit from greater clarity.

Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the <u>The</u> updated Planning Practice Guidance; <u>requires</u> 25% of all homes required <u>delivered</u> through developer contributions as part of planning obligations agreed under Section 106 agreements <u>should to</u> be delivered as First Homes. Policy LP23 will require the delivery of First Homes which a <u>should be</u> discounted by at least 30% against the market value, <u>acknowledging the variance of market conditions across the borough</u>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p> <p>At criterion (F), line 1, delete, 'The management of the affordable housing provided (other than in Build to Rent schemes and in relation to First Homes) it should be undertaken by a Registered Provider which is' and replace with, '<u>Where a Registered Provider is required for the management of affordable housing, it should be undertaken by</u>'.</p>
Consultee Full Name	Pocket Living
Consultee Organisation Details	Pocket Living
Agent Full Name	Mr Thomas Hatch
Agent Organisation Details	Quod
Comment ID	622
Title	LP24 Housing Mix

Number	Policy 35
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP24 – Housing Mix</p> <p>LP24B</p> <p>Single Person Homes</p> <p>Policy LP24E should be amended to remove reference to a maximum of 5% single person homes in the market tenure only.</p> <p>Projected growth in the number of single person households is identified in the Council's SHMA evidence base. There is no evidence that these households only require market housing. This cohort typically comprises younger single persons who have been forced to live in low quality overcrowded or otherwise unsuitable shared rental housing. These households are largely aspiring first time buyers who cannot afford to buy locally within a reasonable travel to work time and are increasingly leaving the borough (creating challenges for local businesses and the delivery of frontline services). Demand for shared rental housing increases pressure on the sharing of homes otherwise highly suitable to families as noted in Policy H10 of the London Plan. Pocket presently have 2,188 individuals on their database who live or work in the borough, registered and eligible for Pocket homes, who would otherwise be unable to afford on the open market housing.</p> <p>LP24E</p> <p>Unit Mix Considerations</p> <p>Policy LP24E should be amended to include flexibility for an alternative mix of unit sizes to be provided where it is justified having regard to material considerations including but not limited to the nature of the site and the specific type/ product of housing proposed.</p> <p>This policy should also specifically recognise that smaller more constrained sites are likely to be better suited to smaller unit types (i.e those designed for individuals instead of large families).</p> <p>The Council's evidence base illustrates there is significant un-met need for all unit sizes in Wandsworth. It is not however always feasible, appropriate or effective to require every individual scheme/ type of developer to attempt to meet every individual type of housing need. A variety of considerations are referenced in Policy H10 of the London Plan.</p> <p><i>Feasibility</i></p> <p>Smaller brownfield sites in urban locations tend to have a range of constraints beyond planning requirements which make it difficult to offer a range of sizes. Pocket's schemes throughout London could not come forward for re- development if they had been required to provide a range of unit sizes due to in many cases to their highly constrained nature.</p> <p><i>Housing Type</i></p>

	<p>Some locations are better suited to smaller households than large families (e.g Town Centres). The exact type of housing product proposed may also be more or less suited to particular unit sizes (e.g rents vs sale). For example, the need for discounted homes for First Time Buyers is largely for young single person housing.</p> <p><i>Overall Effectiveness</i></p> <p>Attempting to require every scheme to meet every type of housing need (regardless of demand or the nature of the site, proposal or developer) is likely to result in a reduction in housing delivery reducing the effectiveness of the plan. A more effective approach would be to support higher levels of family homes on larger sites (that can accommodate family housing) and smaller unit sizes on smaller constrained sites. The addition of this policy reference is therefore critical for ensuring the right homes are built in the right locations and the efficient use of brownfield land for housing delivery. The delivery of smaller unit sizes on constrained sites can also indirectly free up highly suitable family homes (with front doors and gardens) presently used as HMO's or informal house shares. The delivery of housing for single persons therefore provides an important opportunity to create family homes. This is noted in the London Plan.LP24UnitMix Exemption Policy LP24should be amended to include flexibility on unit mix where the large majority (75%+) of housing is proposed as affordable housing. Encouraging the delivery of schemes in which the large majority of homes (75%+) are affordable homes is important for increasing and accelerating the delivery of new affordable homes and meeting unmet local housing need. Requiring these schemes to provide prescribed unit mix may make them less viable/ attractive for Registered Providers and SME developers of affordable housing such as Pocket. Allowing some schemes greater flexibility to focus on a particular unit size in order to encourage their delivery would therefore make an important contribution to meeting local needs. Attempting to require every scheme to meet every type of housing need (regardless of the nature of the site, proposal or developer) is likely to result in a reduction in housing delivery reducing the effectiveness of the plan. Proposals for a high proportion (75%+) of this type of affordable housing should therefore be afforded strong policy support to encourage their delivery regardless of the overall mix of unit sizes proposed.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>The reference to 5% single person households is brought forward from the adopted DMPD, and is reflected in the current evidence (Local Housing Needs Assessment). Whilst the growth in single person households is recognised in the LHNA, this does not necessarily result in a proportionate increase in demand for small studios. Policies for the revision of new homes also seek to ensure a contribution to the creation of stable local neighbourhoods and cohesive communities. Provision is made for other forms of housing in the plan.</p> <p>Policy H10 of the London Plan is already a relevant consideration for housing mix and does not need repetition in the Local Plan. The mix defined at Policy LP24 is derived from the Local Housing Needs Assessment and is based on an up to date study. Whilst borough-wide proportions are established for market and affordable housing, these are clearly indicative and are dependent on the site by site assessment allowed by criterion (E). This framework therefore allows for flexibility in the housing mix and allows evidence to support deviation from the indicative mix where this is warranted (which may include smaller sites).</p> <p>Policy LP24 is silent on the issue of flexibility on schemes with over 75% affordable housing, so does not specifically exclude it. Scope exists within the London Plan to address this aspect of flexibility within the provision of affordable housing, but the London Plan is qualified by stating that this flexibility is also at the borough's discretion (i.e. 'where supported by the borough'). This can be applied on a case-by-case basis.</p>
Proposed Change	No change considered necessary
Consultee Full Name	Pocket Living
Consultee Organisation Details	Pocket Living
Agent Full Name	Mr Thomas Hatch
Agent Organisation Details	Quod

Comment ID	623
Title	LP27 Housing Standards
Number	Policy 38
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP27</p> <p>Amenity Space Policy LP27 and the supporting text should be amended to recognise it is not always possible for every home to have direct access to a balcony or other private amenity space on small more constrained sites. It should also recognise that it is also not always necessary (e.g where the homes are designed for individuals instead of families). The policy objective for all homes to provide high quality design and appropriate provision of private amenity spaces is supported. Constrained sites however tend to have fewer opportunities for providing private amenity space and play space. They are therefore better suited to higher densities of smaller unit sizes. Encouraging roof gardens and other innovative uses of community space should be sought in these of locations Housing delivered on constrained sites may not be able to appropriately accommodate private balconies and/or other private amenity space without rendering schemes unviable (noting these types of previously developed sites typically have significant viability challenges which require a critical mass of development). Delivery of housing on these sites should not however be discouraged. Delivering housing for smaller households (i.e single person households) who are in housing need but far less reliant on amenity space and lift access than couples and families will ensure these sites can be unlocked thus making the best and most efficient use of available brownfield housing land. It is for this reason 1 bed 1 person homes are not nationally required to provide balconies. Attempting to require schemes on constrained sites to meet the same standards expected in less constrained sites is likely to result in a significant reduction in housing delivery and the needs of fewer households being met overall. This would inhibit the overall effectiveness of the Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>Private amenity space is important to maintaining the health and well-being of residents, and has been invaluable for those that have it during periods of lockdown. Wandsworth has sought private amenity space in housing developments for many years and wishes to continue to see private amenity space in new housing that is meaningful.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Pocket Living
Consultee Organisation Details	Pocket Living
Agent Full Name	Mr Thomas Hatch
Agent Organisation Details	Quod

Comment ID	624
Title	LP30 Build to Rent
Number	Policy 41
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP30 –Build to RentLP30A1BTR Tenures Policy LP30A1 should be amended to delete reference to the need to provide low cost rented housing managed by a Registered Provider. LP Policy H11 confirms that the affordable housing offer for B2R developments can be solely Discounted Market Rent (DMR). This is consistent with national planning policy which confirms affordable housing on build to rent schemes should be provided by default in the form of affordable private rent (another term for DMR). LP30A2DMR Affordability Policy LP30A2 should be amended to clarify that the reference to 'genuinely affordable' refers to definition set out in the Mayor's Housing Strategy. The term 'genuinely affordable' is open to varied interpretation (as evidenced by recent planning decisions). As noted in NPPG the quantum of affordable housing must relate directly to the discount required (NPPG Paragraph: 002 Reference ID: 60-002-20180913). Failure to provide a definitive definition of genuinely affordable makes it impossible for applicants to determine the discount required by this policy when making investment decisions. This will deter investment in the Borough and reduce the effectiveness of the plan. The only formal definition of 'genuinely affordable' is defined in the Mayor's Housing Strategy (2017). This definition should be adopted. Failure to support Build to Rent will reduce overall delivery of good quality rental homes which the Council's housing evidence base demonstrates are needed alongside affordable home ownership options.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The supporting text sets out the Council's preference to secure low cost rented housing where possible through BtR schemes, allowed for by London Plan para 4.11.10. Under these circumstances, criterion A.1 would apply, and reference to an RP is relevant and necessary, alongside the reference, in design terms, to a separate block which is designed to aid management.</p> <p>The glossary of the Local Plan cross references the definition of affordable housing to the London Plan. It is clear from this that the definitions of 'affordable housing' and 'genuinely affordable housing' stem from the London Plan policies and the Mayor's Housing Strategy.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Stuart Gulliver
Consultee Organisation Details	Albion Riverside
Agent Full Name	ms mandy wetherell
Agent Organisation Details	DPDS
Comment ID	625
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>DPDS Consulting Group [DPDS] has been instructed by Mr Stuart Gulliver [‘the client’] to prepare and submit written representations on his behalf to the Wandsworth Local Plan Pre-Publication (Regulation 19) consultation. 1.2 The client owns a property at Albion Riverside and has a specific interest in potential development allocations or policy designations at the riverside location around Battersea Bridge (circled red at Figure 1 below), as development in this area will have an impact on the future amenity of his property.</p> <p>2.0 Summary of Regulation 18 Representations 2.1 DPDS were also instructed by the client to prepare representations in respect of the ‘Pre Publication’ (Regulation 18) Draft Local Plan which was published for consultation in early 2021. 2.2 A summary of the representations made is listed below: The client agreed with the location of interest (i.e. the riverside area around Battersea Bridge) being considered a ‘focal point’ and having ‘valued views and vistas’ both from and towards the area. With regards to the ‘smart growth’ sub-section of Policy PM9 (Wandsworth’s Riverside), the client agreed with approach that any residential-led development should be of a small scale which is appropriate to serving local needs. With regards to the ‘placemaking’ sub-section of Policy PM9, the client strongly agreed that new development along the riverside should conserve and enhance the quality of the built and natural environment including architectural quality of buildings and preservation of important local views and vistas. The client did suggest, however, that more could be done through the wording of Policy PM9 to ensure that any new development is also required to be compatible with existing/surrounding land uses and not have a detrimental impact on the amenity of the area (including existing properties and businesses), both through construction and operational phases. Representations were also made on Policy LP4 (‘Tall Buildings’) and the client welcomed that there is a specific policy for developments of this nature which has been informed by an Urban Design Study. The client agreed that any proposal for buildings of 5 storeys or more in the location of interest should be considered ‘tall’ and subject to scrutiny against relevant tall building policies. With regards to the sub-section of Policy LP4 titled ‘Tall Buildings Near the River Thames Frontage’, the client suggested that due consideration must be given to the impact that massing of a tall building would have with respect to all immediate surroundings (not just front and back relative to the river), and a particular emphasis should be made on addressing and mitigating impact on existing adjacent land uses, especially existing residential properties. The client welcomed the sub-section of Policy LP4 concerning ‘Microclimate and Lighting’ but suggested that specific reference also needs to be made to consider the impact of wind patterns on tall buildings and their surroundings on the riverfront where, by definition, there are no other structures to break the wind. This is particularly important given the greater frequency of severe weather arising from climate change.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan. The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary
Consultee Full Name	Stuart Gulliver
Consultee Organisation Details	Albion Riverside
Agent Full Name	ms mandy wetherell
Agent Organisation Details	DPDS
Comment ID	626
Title	Area Strategy for Riverside
Number	11
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	This section sets out the clients comments on policies and allocations which may have an impact on the amenity of their property. In some cases the comments reaffirm or elaborate on those made at the Regulation 18 consultation stage. Section 11 – Area Strategy for Wandsworth’s Riverside 3.2 The policy is supported by an Overarching Spatial Area map (Map 11.1) which, as per the Draft (Regulation 18) Plan, identifies the client’s location of interest as a ‘Focal Point of Activity’. The area is also identified as holding some ‘Valued views and vistas’ which the client agrees with and supports the protection of these views (both from and towards the area) through appropriate development management policies. 3.3 Paragraph 11.1 of the Plan states that “Wandsworth’s Riverside continues to play an important role in defining the distinctive character of the borough by offering places to gather, rest, play, work, and enjoy the views of the Thames”. 3.4 It is noted that the Plan allocates 11 sites for development in the general riverside area, with the nearest to the client’s location of interest (approx. 350m south-west) being ‘RIV11 – Battersea Church Road/Crewkerne Court Garage’ which is allocated for residential development with the provision of play and parking facilities. In terms of height, the allocation identifies the site as suitable for a 6-8 storey development (maximum). The client has no particular objection to this allocation given that it is well set back from the riverside, but would have concerns regarding any large-scale allocations or tall building development proposals any closer to the river frontage around Battersea Bridge as this could compromise the role of the riverside as set out at paragraph 3.2 above. The client’s view in this respect is discussed further in subsequent paragraphs of this representation. 3.5 It is acknowledged that there are a cluster of site allocations relatively close to the riverfront further south-west of the client’s property (York Road/Lombard Road area), however in many cases these are on existing or former industrial or commercial sites. 3.6 We have also reviewed representations made by interested parties to the Regulation 18 consultation and wish to comment specifically on Comment Number 1644 which was made on behalf of the freeholder of The Glassmill, 1 Battersea Bridge Road. The Glassmill is located immediately adjacent to the client’s

	<p>property. 3.7 The comment suggests that “the Site should be allocated in the Draft Local Plan for residential-led development to provide circa 150 residential units, with potential for commercial uses at ground floor level”. 3.8 Wandsworth Council’s response to this comment is that “Due to the recency with which the existing building was developed it is considered to be unsustainable to allocate the site for redevelopment. As well, it is considered that the Local Plan policies provide sufficient guidance if any proposals were to come forward. The Glassmill, 1 Battersea Bridge Road does not require a site allocation”. The client wholly agrees that the site is not appropriate for a site allocation Comment 1644 also notes that “Owing to its position at a key gateway into the borough, it is considered that the Site would be a suitable location for delivery of a tall building, in line with Draft Policy LP4”. The Council has not specifically responded to this part of the comment, however the client strongly disagrees with this part of comment 1644. 3.10 Whilst it is acknowledged that Battersea Bridge does provide an entrance into Wandsworth Borough from the north, the client does not consider redeveloping just its eastern side to constitute the creation of a successful gateway. Rather, it would create a lopsided townscape as one enters the Borough and would appear akin to a gate with just a single gatepost – not making any visual or functional sense. 3.11 The client also has concerns with the potential appearance and functionality of any tall building redevelopment of The Glassmill site in isolation. The relatively small existing footprint of The Glassmill would result in a tall, narrow structure which would be at complete odds with the existing townscape and character of the area. The desirability of use of the ground floor by commercial operators would also be significantly reduced owing to the limited footprint, and this in turn would have a detrimental impact on the vibrancy of this part of the riverside. From a practical view there would also be constraints concerning car parking, servicing and circulation space given the limited footprint. Overall, any allocation of The Glassmill site would be piecemeal and premature given the above two observations. In any case, as per the Council’s response to comment 1644, a redevelopment allocation at The Glassmill would also not promote sustainable development given that is of a fairly recent build. 3.12 The above observations are made directly in response to comment 1644 of the Regulation 18 consultation and are not supporting or suggesting any allocation at The Glassmill or any adjacent sites. Further comments in respect of the overall policy approach to tall buildings, particularly in the area around Battersea Bridge, are made in subsequent paragraphs of this representation which address Policy LP4 (Tall and Mid-Rise Buildings). 3.13 In terms of strategy, the client supports the aim of Policy PM1 (Area Strategy and Site Allocations Compliance), particularly in the context of the Glassmill site, which states that “Proposals which do not comply with the relevant development plan policies, Area Strategy and Site Allocations will be resisted unless it is clearly evidenced that an alternative type of development can be justified...” [our emphasis].</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Support noted. The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. See separate response to LP4.
Proposed Change	No change considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	627
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	

If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Thank you for consulting the Mayor of London on the Wandsworth Draft Local Plan: Publication Regulation 19 Consultation Version. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.</p> <p>The Mayor provided comments on the earlier Wandsworth Local Plan Full Review Issues Document 2018 on 6 February 2019 (Ref: LDF32/LDD09/CG01) and on the Pre-Publication Regulation 18 Consultation Version, November 2020 (Ref: LDF32/LDD09/LP02/LG01 on 01/03/2021). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021).</p> <p>The London Plan</p> <p>The London Plan 2021 was formally published on the 2 March 2021, and now forms part of London Borough Wandsworth's (LBW) Development Plan and contains the most up-to-date policies.</p> <p>General</p> <p>We note LBW's Covid 19 recovery plan, and this letter provides an opportunity to draw your attention to the Mayor's pandemic recovery missions. There are nine missions in total, including high streets for all, enabling resilient communities and digital access for all, which may be useful in helping to develop the spatial strategy for Wandsworth further.</p> <p>The borough's Local Plan vision and objectives are clearly set out early on, and this is welcomed by the Mayor. The draft plan establishes 14 principles, applied within place approaches comprised of Placemaking, Smart Growth and People First – which are carried through into area strategies.</p> <p>The draft Plan divides the borough into character areas, each with their own area specific strategy, which respond to the unique characteristics, context and growth aspirations of each of these sub-areas, and which include site allocations. General development policies follow. The overall approach is one which is aligned with the Mayor's Good Growth objectives and is welcomed.</p> <p>However, as currently drafted, the Mayor considers that the borough's approach to industrial land constitutes an issue of general conformity. He also has concerns regarding affordable housing. These are discussed in greater detail under relevant headings.</p> <p>The Mayor notes and welcomes the inclusion of Policy SDS1 which sets out the overall Spatial Development Strategy. This now includes a housing target of 20,311 new homes over the plan period, including 1,950 new homes per annum up until 2028/29, of which small sites comprise 414 per annum. This aligns with Wandsworth's targets in the London Plan (including Policy H2 on small site allocations) and is welcome. The plan period has also been clearly indicated (to 2038) in SDS1. Site allocations are set out clearly on maps and some additional detail has been provided to indicate the potential of sites to accommodate growth.</p> <p>It is noted that the promotion of the economy and local employment is a main objective of the plan, and while the commitment to a net increase in industrial floorspace expressed in SDS1 (Part E 3) is supported, the Mayor has broader general conformity concerns regarding the provision of non-industrial uses in SIL and concerns over the deliverability of this strategy.</p> <p>Officers are happy to continue working with Wandsworth to provide support to resolve non- conformity concerns regarding the strategic spatial approach to industrial land in order to support the delivery of Good Growth in the borough in line with the London Plan.</p>

	<p>Next steps</p> <p>GLA officers continue to offer their support in order to resolve the issues identified in this letter and to provide guidance.</p> <p>I hope these comments inform the ongoing preparation of the Wandsworth Local Plan and we look forward to continuing to work with you to ensure it aligns with the London Plan as well as delivering Wandsworth's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Nina Miles at nina.miles@london.gov.uk</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. Detailed Council responses, including conformity issues over the delivery of SDS1 E. 3 are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	628
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Housing</p> <p>The London Plan 2021 sets Wandsworth a 10-year net housing delivery target of 19,500 units (1,950 per annum) up to 2029 as set out in Table 4.1. Of this target, 4,140 new homes should be identified from small sites (set out in Table 4.2 of the LP2021). The Local Plan sets a housing target of 20,311 homes over the plan period and includes a commitment to delivering 1,950 new homes per annum up until 2028/29 and to providing 414 new homes per annum from small sites across the entire plan period, taking a sequential approach to the location of</p>

	<p>new allocations. This aligns with the London Plan targets. The draft plan maintains the borough's commitment to the preparation of an SPD which will identify sites and set out design codes for those sites/areas and this is welcomed as it accords with the requirements of London Plan Policy H2. The Mayor has recently published for consultation draft London Plan guidance on design and characterisation consisting of characterisation and growth strategy guidance, small site design codes guidance, optimising site capacity guidance and housing design standards guidance. This should inform the development of the SPD – and can be found at https://consult.london.gov.uk/hub-page/london-plan-guidance-2.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.

Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	629
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Affordable and Specialist Housing</p> <p>The draft plan sets out in LP23 A Wandsworth's commitment to meet the Mayor's 50% strategic target for affordable housing which the Mayor welcomes, as he does the references in LP23 B to Policy H5 and the confirmation that developments of 10+ units (gross) must provide on-site affordable housing in line with the threshold approach. He also notes the revision to the supporting text para 17.16 that this is measured in habitable rooms in line with Policy H5.</p> <p>LP23 Part C sets a tenure split of 50:50 (social/affordable rent: intermediate) with 25% for First Homes. Whilst para 17.12 acknowledges the London Plan's requirement for provision to be focused on genuinely affordable tenures and commits to prioritising these tenures, the Plan also proposes a broader spectrum of affordable housing provision including other intermediate products such as Shared Equity, Discounted Market Sale and Intermediate Rent. While the London Plan does not prevent a focus on these other tenures, the Mayor would not support an approach which made Discount Market Sale a preferred tenure.</p> <p>Although a 50:50 split is within the limits of Policy H6 LP2021, the Mayor considers that given the extent of need¹ – including as detailed in the Council's Local Housing Needs Assessment (2020) – the inclusion of 25% First Homes requirement with a variable discount (depending on viability) before exploring greater proportions of low-cost and intermediate rents to provide for a range of incomes, is a concern. Moreover, the London Plan is clear that intermediate ownership products should be affordable to households with incomes up to £90,000. It is considered unlikely that First Homes – even with a deep discount to market value – can deliver genuinely affordable homes to a range of household incomes up to this cap, therefore more information is needed surrounding First Homes deliverability and affordability in Wandsworth in the context of strategic and local need². Does the borough, for example have evidence which demonstrates that First Homes are attainable to households in Wandsworth that are considered to be in need of intermediate homes, or that they would be more affordable than other intermediate products (without making Social Rent or London Affordable Rent unviable)? Additionally, does it have the resources available to administer First Homes (i.e. the discount to market value, affordability requirements, household eligibility criteria etc) for each subsequent sale in perpetuity at the scale envisaged in the policy? Overall, the Mayor would like to be assured that the issues for consideration set out in the GLA's First Homes Practice Note (July 2021) have been fully explored.</p> <p>¹ The London SHMA identified that 47% of London's housing need is for low-cost rent homes.</p> <p>² This is clear from their needs assessment which states: "It might therefore be sensible to allocate up to 50 per cent of the discretionary target (i.e. 20% overall) to intermediate tenures as long as future policies prioritise London Living Rent over Affordable Rent at 80% market discount dwellings, which are less affordable".</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted.</p> <p>The London Plan has a presumption in favour of social rent and intermediate housing, but acknowledges the wider range of products that could contribute to genuine housing need. This includes DMS.</p> <p>Government policy towards affordable housing was amended by a WMS after the adoption of the London Plan. Whilst the GLA have issued guidance to suggest that First Homes aren't preferable or workable in London, the London Plan allows boroughs to identify other forms of affordable housing to meet needs where they are viable or where they would deliver a more mixed and inclusive community (para 4.6.2).</p> <p>Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability. However, the requirement for First Homes is set out in the National Planning Practice Guidance, and this does not need to be repeated within the Local Plan policy. Changes are made to the supporting text to Policy LP23 to explain this.</p> <p>It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. Flexibility can be introduced in to the wording to seek a balance of intermediate products after the agreement of the low cost rented element. Given the identified need for low-cost rent, which is highlighted in the London Plan and sought through the discretionary 40% element set out in London Plan Policy H6 (A.3), it is considered prudent to introduce 'at least' 50% low cost rent into the policy to emphasise this figure.</p>
Proposed Change	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <u>at least</u> 50% low-cost rent products, 25% First Homes and 25% <u>with a balance of</u> other intermediate products. A minimum discount of 30% will be applied to First Homes.'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <u>at least</u> 50% low-cost rented, 25% First Homes and 25% <u>with a balance of other</u> intermediate products will be required.'</p> <p>Amend para 17.13 to read, 'In accordance with the <i>The</i> updated Planning Practice Guidance, <i>requires</i> 25% of all homes required <i>delivered</i> through developer contributions as part of planning obligations agreed under Section 106 agreements should to be delivered as First Homes. Policy LP23 will require the delivery of First Homes which are <i>should be</i> discounted by at least 30% against the market value, <i>acknowledging the variance of market conditions across the borough</i>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	630
Title	LP27 Housing Standards
Number	Policy 38

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>The Mayor welcomes the requirements in Policy LP27 Housing Standards to meeting the housing standards set out in Policy D6 LP2021, the accessible housing requirements in Policy D7 LP2021, and to being in accordance with Policy D5 LP2021 and achieving the highest standards of fire safety in line with Policy D12 LP2021. He also notes and supports the downward revision to the policy limiting conversions to those dwellings larger than 130sqm (as opposed to 150sqm previously).</p> <p>The Mayor notes and accepts that it is LBW's intention to retain a policy for family sized conversions (over 130sqm) to be provided with direct access to a dedicated garden of at least 15sqm and notes the justification that the borough consider 15sqm more usable and that this will generally apply to ground floor units which can be provided with direct access.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted
Proposed Change	No change required
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	631
Title	LP28 Purpose Built Student Accommodation
Number	Policy 39
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	

Details of reason(s) for representation	The Mayor welcomes the clarity provided in Policy LP28 A that the Mayor's Threshold Approach applies to purpose built student accommodation, to support the delivery of affordable accommodation.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted
Proposed Change	No change considered necessary
Consultee Full Name	Stuart Gulliver
Consultee Organisation Details	Albion Riverside
Agent Full Name	ms mandy wetherell
Agent Organisation Details	DPDS
Comment ID	632
Title	PM9 Riverside
Number	Policy 10
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	Policy PM9 – Wandsworth's Riverside 3.14 Within the 'Placemaking' sub-section of the policy, paragraph 1 states that: "New development should conserve and enhance the elements and existing features that contribute to Putney Riverside's strong character, distinctive sense of place and high-quality townscape". The client supports this policy approach but suggests that it should be applied across the entirety of Wandsworth's Riverside and not just Putney. 3.15 The policy also states that development proposals will be required to respect and enhance the views and vistas established in the Urban Design Study (2021). The client supports this approach. 3.16 The policy adds states that development proposals for tall or mid-rise buildings in Wandsworth's Riverside will only be supported in specifically identified zones at Appendix 2 of the Plan and that they will need to address the requirements of Policy LP4 (Tall and Mid-rise Buildings) as well as other policies in the Plan as applicable. The client welcomes that there is a specific policy and supporting studies to guide and control any potential tall or mid-rise building proposals in Wandsworth. This is commented on in more detail later on in this representation. 3.17 The 'Inclusive Growth' sub-section of Policy PM9 promotes residential-led development in the Focal Points of Activity, alongside a mixture of uses to increase activity and vibrancy along the riverside. The policy adds that such proposal should be of a small-scale [our emphasis] which is appropriate to serving local needs. The client supports this approach. 3.18 Overall the client supports the general aims of Policy PM9, however they feel that more

	could be done through policy requirements to ensure that any new development on Wandsworth's Riverside is compatible with existing/neighbouring land uses and would not result in a detrimental impact on the amenity of neighbouring properties, both through construction and operational phases. This might be achieved through a specific reference to compliance with Policy LP2 (General Development Principles) which sets out appropriate criteria in this respect.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Putney's riverside is set out separately due to its special character, distinctive sense of place and high-quality landscape. It is considered that separate criteria are required to respond to Putney's placemaking circumstances. Riverside sites (RIV 1-9) have their own criteria which respond to the opportunities for development in the area which in general would consist of developing new areas rather than responding to existing heritage buildings.
Proposed Change	No change considered necessary.

Consultee Full Name	Stuart Gulliver
Consultee Organisation Details	Albion Riverside
Agent Full Name	ms mandy wetherell
Agent Organisation Details	DPDS
Comment ID	633
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Policy LP4 – Tall and Mid-Rise Buildings 3.19 The client welcomes a specific policy which concerns proposals of this nature (i.e. tall or mid-rise buildings) and supports a more restrictive approach to tall buildings in the Borough. 3.20 The client agrees with paragraph A of the policy, which states that any building which is 7 storeys (or 21m) or more will be treated as a ‘tall building’. 3.21 The client supports the policy requirements which are set out to address ‘Visual Impacts’ of tall and mid-rise buildings, in particular paragraphs 2 and 3 which state the following: “The proposed location of the tall building(s) must avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines [our emphasis]”; and “Proposals should be designed to reflect and respond to an analysis of relevant key view corridors towards the site to ensure the location, form, detailing and prominence of the tall building(s) are appropriate within the wider context [our emphasis]”. 3.22 The client also welcomes the policy requirements concerning ‘Spatial Hierarchy’, in particular paragraph 7 which states that: “The massing of any proposed tall buildings should be proportionate to the local environment, including when taking into consideration the width of publicly accessible areas adjacent to the proposed building(s) as well as the proximity to public open spaces, parks and watercourses, and should be designed so as not to create an overbearing impact having regard to its context [our emphasis]”. The client is of the view that ‘massing’ and ‘overbearing’ are especially important considerations, not only in the context of outdoor spaces but also when assessing the impact of tall or mid-rise building proposals on existing residential properties or employment locations. There is an opportunity for the policy to be reworded to reflect this The client welcomes a specific sub-section of the policy concerning ‘Tall Buildings near the River Thames Frontage’. Paragraph 9 states that: “Tall buildings should not result in the creation of development which would impede the outlook and/or amenity of occupiers of existing buildings [our emphasis] or users of public spaces having regard to their relationship with the river frontage”. The client strongly supports a specific policy requirement which requires tall building proposals to consider and assess impact on the outlook and amenity of occupiers of existing neighbouring buildings. There is, however, an opportunity to further enhance this policy by providing a definition of what constitutes amenity, as this might comprise a number of different elements such as light spill/pollution, access to natural light, overshadowing, privacy or noise nuisance. Alternatively, specific reference could be made to Policy LP2 (General Development Principles) which sets out appropriate policy criteria in this respect. 3.24 Access to natural light is of particular importance in the context of the aforementioned Glassmill site, where presence of a taller building would have a significant detrimental impact on nearby affordable homes which are likely to be occupied by young families or elderly people. 3.25 With regards to paragraph 10 of the policy, the client is of the view that the policy should be reworded to ensure that due consideration is also given to the impact that massing of a tall building would have with respect immediate surroundings in all directions (not just the north-south relationship between the river and land) and a particular emphasis should be made on addressing and mitigating impact on existing adjacent land uses, especially residential properties. 3.26 The client welcomes that such suggested approach does appear to have been incorporated into paragraph 12 which concerns ‘Microclimate and Lighting’ and states that: “The design of any tall building should avoid including lighting features which adversely impact on the occupiers of surrounding buildings (particularly those in residential use) [our emphasis], as well as on night-time vistas and panoramas and fauna”. 3.27 The client also welcomes the policy approach concerning light spill at Paragraph 13, which states that: “The design and glazing of any proposed tall building should take into account its use at night,</p>

	<p>minimise light spill that would result in light pollution and avoid creating unacceptable solar glare onto any publicly accessible areas or where it would have an adverse effect on the amenity of occupiers of adjoining buildings [our emphasis]". 3.28 Notwithstanding reference to 'environmental impacts' and relevant London Plan Policy D9 (Tall Buildings), the client is disappointed that no specific reference to wind impact, as suggested at the Regulation 18 stage, has been incorporated into the wording of Policy LP4. The client strongly suggests that explicit reference is made to wind impact to ensure that developers give sufficient consideration to such impact when putting forward any proposals for tall buildings. Consideration needs to be given not only to the direct impact of wind on potential new buildings, but also the ensuing impact of vortex shedding on adjacent buildings, circulation spaces and public spaces at all heights. This is a public safety concern and particularly important consideration on the riverfront where, by definition, there are no other structures to break the wind. The greater frequency of severe weather arising from climate change in recent times only adds to the strong justification for including an explicit reference to consideration of wind impacts in Policy LP4, rather than relying on developer interpretation and cross-referencing of policies</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support noted. The criteria of Policy LP2 General development principles would be considered as part of the determination of a planning application as the Local Plan should be read as a whole.</p> <p>The consideration of wind impact is already a criteria of London Plan Policy D9 C3 (a) and its replication is not considered necessary in LP4.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	634
Title	LP32 Traveller Accommodation
Number	Policy 43
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP32 safeguards the existing Gypsy and Traveller site at Trewint Street to meet identified needs over the Plan period and commits to identifying new sites should any additional need arise over the plan period. The supporting text indicates at paragraph 17.63 that there is currently no identified need for additional pitches on this site or elsewhere within the borough based on its Gypsy and Traveller Accommodation Needs Assessment (2019).</p>

	<p>It should be noted that the Mayor is commissioning and overseeing a London-wide Gypsy and Traveller accommodation needs assessment. We expect findings to be available in early 2023 and will share these with boroughs. Meanwhile, boroughs should plan to meet need as identified in any needs assessment they have conducted since 2008, or, in the absence of a local assessment conducted since 2008, the need identified in Table 4.4 of the Plan.</p> <p>The Mayor will support boroughs in finding ways to provide Gypsy and Traveller accommodation. Funding is available for boroughs and other registered housing providers through his Affordable Homes Programmes for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches where an audit of existing pitches (refer to LP2021 Policy H14 paragraph 4.14.5) identifies that refurbishment is needed.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted
Proposed Change	No change required.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	635
Title	LP13 Circular Economy, Recycling and Waste Management
Number	Policy 24
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Waste</p> <p>The Mayor welcomes the clarity of SDS1 Part G which sets out a clear commitment to meeting identified waste needs through protecting existing waste sites, identifying suitable areas for new recycling and waste management facilities and supporting the Mayor's ambition of net zero waste by 2026 through the circular economy. This is further detailed in Policy LP13, although the plan does not identify any specific additional sites or areas for waste, which the Mayor considers misses an opportunity, and calls into question the deliverability of the plan approach, given the identified waste capacity gap.</p>

The Mayor welcomes Wandsworth's commitment in Policy LP13 A to meeting its waste apportionment targets which it sets out in Table 15.5 of the Local Plan. These are in line with the apportionment figures in Table 9.2 of LP2021 for 264,000 tonnes by 2021 and beyond.

All existing waste sites are safeguarded for waste use (as stated in para 15.67) which is in line with Policies SI 8 and SI 9 of the London Plan. Also welcomed is the policy requirement in LP13 C that 95% of construction and demolition waste be reused, recycled or recovered for beneficial use and so too is the requirement for Circular Economy Statements to accompany all referable planning applications, both of which are in line with Policy SI 7 of the LP2021.

Wandsworth's support in LP13 A for the Mayor's net self-sufficiency target is noted. However, the Mayor remains concerned about the immediate identified capacity gap in meeting its waste apportionment target. This amounts to up to 2.1ha land in 2021, depending on the type of facility. Para 15.73 should commit to closing the gap, rather than 'seeking to' close it, which better supports the commitment set out in policy. This paragraph also sets out where new facilities will be directed, but otherwise the paragraph states that beyond 2026 where waste management targets have not been met, LBW will monitor and 'work with the GLA to engage with operators to encourage additional waste management capacity'. As the Greater London Authority is not a waste planning authority, the Mayor considers that it is for the borough to take a more proactive approach to delivering additional capacity, in line with paragraph 9.8.6 and 9.8.7 of the London Plan, and to documenting effective cooperation and clearly setting out where it has gone as far as it is able to. While the Mayor notes the borough's Waste Export evidence base study which records and audits issues raised through the duty to cooperate engagement on waste exports between Jan-March 2021, LBW is encouraged to consider how it can go further. Wandsworth needs to proactively engage with neighbouring boroughs to provide greater reassurance that its plan approach is deliverable. This could include:

- allocating more waste sites within the borough or outside, in line with Policy SI 8 B4 (a-c), which could include SIL/LSIS,

- considering intensification of existing safeguarded waste management sites which would require Wandsworth to demonstrate spare capacity or that it can accommodate additional capacity; and

- where apportionment targets are not going to be met in the borough, seeking to enter into joint waste plans, joint evidence and bi-lateral agreements to transfer the borough's apportionment and show how these can be met in the respective agreement/joint plan.

The reference to meeting 100% of C&D Waste including hazardous waste is welcome, and while it is noted that the borough will seek opportunities for the beneficial use of excavation waste within the borough, paragraph 15.71 notes that not all excavation waste is expected to be used within the borough.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Support welcomed.

It is not true to say that the plan does not identify any specific additional sites or areas for waste. Policy LP13 F states "New waste capacity to close Wandsworth's capacity gap is directed towards existing facilities, safeguarded wharves, and SIL and LSAs."

While there is currently a capacity gap for apportioned waste, the need is not "immediate". The target of net self-sufficiency for waste management is not until 2026.

Wandsworth is reliant on the market to deliver capacity to meet C&I and C&D waste management facilities. This means that Wandsworth cannot build the waste capacity itself, but is required, by the NPPW and London Plan, to create the opportunities for the market to deliver new waste facilities. There is no guarantee that the market will deliver and therefore Wandsworth's cannot commit to close the gap, only seek to do so. The London Plan does not require Boroughs to deliver waste capacity themselves, but to "allocate sufficient sites,

identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2." Policy LP13 does this by safeguarding existing waste sites and identifying areas suitable for new waste facilities.

No waste sites came forward during the call for sites. This is not unusual as waste operators rarely put forward sites to be included in a Local Plan or Waste Plan. It should also be noted that allocating a site for waste uses does not mean that the site will be developed for a waste use. In previous years, a number of boroughs have allocated sites for waste uses, for example the West London and East London Boroughs in their respective waste plans. No site allocated for waste use in the West London Waste Plan or East London Waste Plan has come forward for waste uses since they were adopted.

While new waste facilities will be required to demonstrate that the site capacity has been optimised (London Plan policy D3), Wandsworth does not have the powers to demand the intensification of existing waste sites where there is no plan to do so by the operator or if no planning application comes forward for an existing waste site.

A detailed analysis of opportunities to meet the London Plan waste apportionment targets, including other Boroughs' ability to help, can be found in submission document SD-105 Waste Evidence Base Addendum Meeting London Plan Apportionment Targets (April 2022). This analysis concludes that:

- Wandsworth's approach to waste planning meets all the London Plan policy requirements. New waste capacity to close Wandsworth's capacity gap is directed towards existing facilities, safeguarded wharves, Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIAs).
- Following a review of sites, no individual sites suitable for allocation for waste uses in the Local Plan have been identified, other than existing waste sites. Sites outside Wandsworth cannot be allocated through its Local Plan.
- There is likely to be an upgrade to the existing Waste Authority facilities but the timescales and capacity increase are as yet unknown. There are no known plans to increase the throughput of any merchant facilities, which are all operating at optimal capacity, and there are no current plans to bring the non-operational site back into waste use.
- There is no opportunity to work collectively with the Western Riverside authorities to pool apportionment targets and plan for waste collectively because OPDC do not agree to do so.
- No other London Boroughs are currently in a position where they have surplus capacity and are at a stage in their Plan-making process to offer surplus capacity to Wandsworth. This position may change after Bexley's Local Plan examination and as the East London Boroughs begin the process of reviewing the East London Waste Plan.

Wandsworth's approach to excavation waste is in line with the London Plan which states at 9.8.1 "The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste. The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream".

Proposed Change	Amend wording to paragraph 15.73 as follows: '...Where monitoring demonstrates that waste management capacity to meet the apportionment target has not been achieved <i>is unlikely to be achieved</i> by 2026, the Council will work with the GLA to proactively engage with operators to encourage delivery of additional waste management capacity in the borough, <i>and may seek help from other London Boroughs to meet the apportionment target.</i> '
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	636
Title	Building a Strong Economy
Number	18

Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Employment</p> <p>Previous comments set out the need for the plan to identify specific sites and areas to accommodate future industrial and waste uses and while the Mayor is pleased to note that some of the site allocations set an expectation of a percentage increase in existing industrial floorspace (e.g. the Riverside Business Centre site allocation (WV1) which now identifies a need for at least a 50% increase in the existing amount of industrial floorspace, and the Frogmore Cluster, WT6, WT7 and WT3 which seeks an uplift of 25% existing industrial floorspace and office). However, the overall scale of losses and gains are not easy to follow, and these should be set out clearly within the plan itself, rather than depending on referring to other evidence base documents such as the HELAA. This would assist future monitoring, which will be important to ensure that the delivery of industrial intensification in particular can be kept under review. It would provide greater clarity to developers if this was also expressed in floorspace equivalent figures, and to ensure that these uplifts are consistently expressed in terms of 'industrial' floorspace rather than just 'economic' use – where appropriate.</p> <p>The Mayor welcomes the commitment to a net increase in industrial floorspace expressed in SDS1 (Part E 3), and he is pleased to see the clear acknowledgement in para 18.23 of the importance of retention and protection of the borough's existing remaining industrial land, as well as the need for intensified industrial floorspace where appropriate. He also notes and welcomes the changes to Part B3 which no longer accepts increased operating hours as an appropriate measure of intensification. However, he remains unpersuaded that the plan will deliver the required need for industrial floorspace, given that it perversely appears to depend almost entirely upon the introduction of non-industrial uses within SIL which is contrary to the London Plan. Specifically, the draft Local Plan is not in general conformity with the following policies:</p> <p>Policy E4A – which makes it a requirement that Local Plans should ensure there is a sufficient supply of land and premises to meet current and future demands for industrial and related functions;</p> <p>Policy E7B – which is clear that the scope for co-locating industrial uses with residential and other non-industrial uses may be considered within Locally Significant Industrial Sites (LSIS), but not SIL.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>The identified need for industrial land is set out within paragraph 18.23, which includes reference to both floorspace- and land-equivalent figures. It is agreed that it would be helpful to also include reference to the borough's capacity to address this need within this paragraph, as informed by the borough's HELAA. This document forms part of the evidence base which justifies the strategy taken in the Local Plan and has been made available to PINS; it is not considered necessary to include substantial detail from the report within the body of the Local Plan for it to be sound. The development of industrial uses is monitored and published within the annual Authority Monitoring Reports, as set out in Policy LP61 Monitoring the Local Plan.</p> <p>References to 'industrial' and 'economic' floorspace within the Local Plan are specific and intended, including with respect to required uplifts in capacity. Both terms are clearly defined (see the supporting text – see paragraph 18.24 and the Glossary).</p>

	<p>The Council's response to the Mayor's concerns regarding the borough's ability to meet the identified need for industrial floorspace are set out in more detail against the Mayor of London's comment #637.</p>
<p>Proposed Change</p>	<p>Amend paragraph 18.23 as follows:</p> <p><i>"...importance of retaining and protecting the borough's existing remaining industrial land within that capacity, and the need to provide intensified industrial floorspace in locations where this is appropriate, is therefore paramount. <u>This policy sets out the Council's strategy to address this identified need and is informed by the borough's HELAA (2022). This exercise identified that the supply of core industrial capacity over the Local Plan period to 2037/38 is 44,828 sqm. The development of industrial uses will be monitored over the Local Plan's duration within the borough's Authority Monitoring Reports.</u>"</i></p>

Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	637
Title	LP34 Managing Land for Industry and Distribution
Number	Policy 45
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Policy LP34 sets out clearly that the council will support applications for specified industrial uses in the borough's SILs and Locally Significant Industrial Areas (LSIAs – which are the equivalent of the Mayor's Locally Significant Industrial Sites (LSISs)). However, the Mayor would stress that the strategic importance of SIL derives from the types of uses which it can accommodate – i.e. those uses which can be difficult to accommodate elsewhere. See paragraph 6.5.1 of the LP2021:</p> <p>“London's SILs, listed in Table 6.2 and illustrated in Figure 6.1, are the capital's main reservoir of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London's economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.”</p> <p>The Queenstown Road Battersea SIL area is in close proximity to central London, where there is little SIL-type industrial land. For this reason the Mayor strongly supports the need to retain SIL <i>in this location</i> to facilitate sustainable servicing of the CAZ. LBW also have demand for additional industrial floorspace, in particular B8 uses, which needs to be met (Paragraph 8.11 of the borough's ELPS 2020 sets out the increasing demand for B8 uses within the borough with paragraph 8.13 contrasting this starkly with the projected loss in supply. It is notable that this draft of the plan has removed previous references to the projected loss of industrial floorspace, and the anticipated impact this will have on meeting demand). The HELAA makes clear that the majority of this floorspace need can realistically only be met within this SIL. The Mayor continues to have concerns therefore about the overall strategy for large-scale co-location of other uses including offices in this SIL, and specific policy wording including LP34 Part B4 – which is central to LBW's vision and strategy for its Battersea Design and Technology Quarter (BDTQ). There is also insufficient evidence, if the potential intensification sites are viable/deliverable to accommodate the different types of industrial uses that need to be accommodated in a SIL.</p> <p>There is no space within the borough for additional industrial land, and much of the Council's strategy for industrial intensification appears to be based on the introduction of other uses in SIL. Policy LP34 Part B4 seeks to allow SME office accommodation and research and development uses on upper floors in the BDTQ. The Mayor considers that rather than intensifying and reinforcing the SIL designation, the introduction of such uses is incompatible with industrial uses and likely to weaken the operational function of the SIL and further restrict opportunities to meet future industrial needs. While there is a proviso in part B4 that the “use does not erode the effective operation of the industrial function of the SIL or LSIAs” this is not sufficient to protect from the impact that such co-location would inevitably have on functioning of B8 and heavier uses within the SIL. Upper floors need to have uses that are in line with London Plan Policy E4A, with implementation of the agent of change principle also being key - so that they do not undermine the types of SIL uses which cause noise, dust, odours, emissions etc.</p>

While noting LBW's stated intention to **retain the BDTQ as SIL**, and its view set out in its consultation statement that "the BDTQ concept should reinforce the area's SIL designation, and that any development within this location should protect and enhance the industrial character of the area rather than de-designate it", the London Plan provides for the introduction of non-industrial uses such as offices within SIL through a plan-led or masterplanning intensification, consolidation and release approach, which would result in the de-designation of relevant parts of SIL to accommodate non-industrial uses together with provision of sufficient capacity for SIL type industrial uses. Even if the borough were to follow this route it would still need to demonstrate sufficient capacity for the sort of 'heavy' industrial types of use that are appropriate to SIL in this location – rather than offices that could locate anywhere). This should take into account the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches. This would mean the borough needing to re-provide genuine SIL-type industrial land elsewhere, and - if there is no scope for additional industrial land within the borough - all additional requirements would need to be met via genuine intensification or substitution (in line with LP2021 E7). Within the BDTQ SIL, the proposed scale and spread of re-development for non- industrial uses including office use are of particular concern.

GLA officers are happy to work with LBW on this, and the work on the BDTQ vision refresh with consultants PRD provides an opportunity to seek greater clarity over how any industrial losses will be offset and additional needs met (particularly for heavier industrial uses and distribution) and to demonstrate how this can be viable and deliverable.

Overall, LBW need to demonstrate convincingly that there is a robust spatial strategy for industrial land that sets out where/how losses - of B8 and other heavier type uses in particular - can be offset, in addition to meeting the additional demand.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

The Council recognises that the Mayor has outstanding concerns with regards to whether the plan will deliver the required need for industrial floorspace, and the associated issues of non-conformity raised with London Plan Policies E4.A and E7.B. The Council is keen to continue working with the Mayor and his officers to take the necessary steps, including making any appropriate amendments, to reassure him that the strategy put forward in the Local Plan strategy is based on a long-term and place-specific vision, is justified by the evidence base, and that it will be effective in practice.

It is noted in the Mayor's representation (set out under comment #636) that the overall scale of losses and gains are not easy to follow. For clarity, Wandsworth's Housing and Economy Land Availability Assessment (2022) has identified that there is industrial floorspace capacity over the period to 2037/38 of 44,828 sqm, which is of a sufficient quantum to meet the identified need for core industrial uses of 35,7000 sqm. As the Mayor identifies, a significant proportion of this capacity (22,297 sqm) is allocated to the Battersea Design and Technology Quarter (BDTQ), the strategic redevelopment of which – through the intensification of industrial uses alongside the provision of new SME office floorspace – the Local Plan promotes. It is noted that the BDTQ forms one of the borough's key economic strategies, and alongside the intensification of industrial capacity, the initiative also seeks to capitalise on investment and deliver myriad benefits to the borough through the creation of a specialised economic cluster. The BDTQ concept was endorsed by Council at an Overview and Scrutiny Committee in February 2020.

As was noted in the Council's previous response (to the Mayor's representations on the Pre-Publication Local Plan), whilst the designation of the 'Battersea Design and Technology Quarter' (including as a moniker) is new to this Local Plan, it builds on a long-standing approach. Much of the same area is designated within the Council's adopted Local Plan as an 'Industrial Business Park' (IBP), of which Policy E12 (Locations for New Employment Floorspace) Part 5 states it has "capacity to provide intensified economic uses including industrial floorspace as well as workspace for SMEs ... B1a (office) and B1b (research and development) uses may also be appropriate".

This approach reflects, among other things, the type of uses which currently occupy the area designated as an Industrial Business Park, including a number of sites which provide for office uses only (such as 220 Queenstown Road in Ingate Place) or for uses that accommodate SME enterprises (such as Battersea Studios in Silverthorne Terrace). The BDTQ concept, therefore, seeks to build on what is already happening within the area, rather than to substantially transform it.

In his representation, the Mayor raised concerns that there was insufficient evidence that the potential intensification of sites is viable and deliverable, or that the borough can accommodate the different type of industrial uses that need to be accommodated in a SIL. It is noted that the BDTQ concept has been informed by significant consultation and engagement with landowners, local businesses and organisations, property managers, long-term leaseholders and other stakeholders in the area, and therefore is built on collaborative and realistic ambitions. This engagement is recorded within and has informed the BDTQ Economic Appraisal and Design Framework (EADF), an important piece of evidence which underpins the concept. As a result of such engagement, and in response to the ongoing development of the Battersea Power Station area (including the presence of Apple), the Council have been in discussions with landowners and have seen a number of schemes being brought forward in line with both the BDTQ vision and the Council's adopted planning policy. These include two formally submitted proposals at:

- 16 and 38-48 Havelock Terrace (2021/3201 and 2021/3202), which were both approved. These schemes make provision to replace the 410 sqm yard at 38 Havelock Terrace and the 368 sqm of industrial floorspace at 48 Havelock Terrace (a total of 778 sqm) with 1404 sqm (GIA) of light industrial floorspace to be provided at ground and first floor level.
- Battersea Studios (2021/0641) for the development of a new building on the site. This outlined ambitions to develop a net increase of 512 sqm of light industrial floorspace alongside flexible offices uses (noting the latter typology already forms the prevalent use in the existing two buildings on site). This scheme was ultimately withdrawn, however it is understood that aspirations for development remain.

The Mayor's officers were consulted upon and were supportive of these schemes and on the basis of site-specific considerations. In the Stage 1 letter on 16 and 38 Havelock Terrace, GLA officers noted that "Whilst large-scale office use is not normally appropriate in SIL, the proposals comply with the Local Plan policies for this part of the Queenstown Road SIL which is subject to an Industrial Business Park designation ... The proposed scheme would provide a significant increase in existing industrial floorspace, alongside office workspace suitable for small and medium sized companies within the Council's emerging Battersea Design and Tech Quarter. Therefore, the intensification of light industrial use as part of an office-led mixed use scheme is supported". With respect to Battersea Studios, officers noted that "The proposed employment uses are supported on this underutilised site within the Queenstown Road SIL and Vauxhall Nine Elms Battersea OA" and that "potential conflicts between uses within the SIL have been appropriately resolved in line with the agent of change principle", including in relation to the site's proximity to "a bus depot to the east, a Network Rail depot to the south, a food distribution centre to the west, and a cement works to the north". The approach seeks to promote the provision of additional industrial floorspace that might not otherwise come forward within this part of the SIL (hence the inclusion of reference within the supporting text, in paragraph 18.34, to 'reinforcing' the area's SIL designation). This is considered to be a more proactive approach to the delivery of industrial land than the 'status quo' (or the protection of industrial uses only), and is aligned with the ambitions of London Plan paragraph 6.5.3, which states that "innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews", as well as the requirements of the NPPF, paragraph 82, that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" and to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period".

It is recognised that the Mayor's concerns also relate to the function served by SILs, and in particular that their strategic importance is derived from the type of uses which they can accommodate (as per paragraph 6.5.1 of the London Plan: "activities which – by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses, particularly residential development). It is recognised that a number of such uses are located within the proposed BDTQ, including the Tarmac site and the Abellio bus garage, which are located in the Silverthorne Road area to the south of the designation. The presence of these uses has been accounted for within the BDTQ concept, and the EADF document is founded on a strategy of gradual transition from heavy to light industrial uses from the southern part of the designation to the north, reflecting the existing uses and the investment in the Battersea Power Station development (see page 46). It is not the intention of the Local Plan to relocate existing heavy industrial uses, and it is relevant that such landowners were invited to participate in the development of the BDTQ concept (and associated EADF). In their representation on the Publication version of the Local Plan, Tarmac Trading Ltd stated that they "would like to express their support for the aspirational growth and development of the Borough as set out within the Local Plan Publication Version, including the development of the Battersea Design and Technology Quarter in which the Concrete Plant is located" (see comment #77). The representation expressed "support the wording of Policy LP34, as long as the objectives of the BDTQ do not lessen the need to ensure the safeguarding of existing industrial uses", stating that "as a land use proposed to fall within the new BDTQ, the operation of the Concrete Plant should be safeguarded as the site previously was when designated within an 'Industrial Business Park'. This would provide confidence to existing industrial occupiers that new development and the diversification of industrial areas will not unduly impact upon their abilities to run successful businesses". It is not the Council's intention that any development proposal should impact on the operation of the industrial function of businesses within the SIL, with wording to this effect included in LP34.B.4. It is recognised that the Mayor has concerns that the inclusion of this wording alone is not sufficient, noting the importance of the Agent of Change principle as a useful tool in this regard. Adherence to this principle, as well as other mitigations achieved through appropriate design, is required for any mixed-use development incorporating economic uses, as per LP37.C.

In his representation, the Mayor notes that any potential losses of industrial land must be offset, and that additional needs – in particular for heavier industrial uses and distribution – must be met. This has been accounted for in the drafting of the Local Plan, and it is noted that the borough's Employment Land and Premises Study anticipates a decline in heavy industrial (B2) uses within the borough over the period to 2034. The forecasting exercise sets out that there will be an excess capacity of B2 floorspace of 1,800 sqm (or a land-equivalent of 0.3ha) by 2029 and 4,900 sqm (or a land-equivalent of 0.7ha) by 2034. The protection for such uses and sites set out within Policy LP34 should therefore be capable of meeting needs with respect to heavy industrial uses. It is recognised that logistics uses form considerable part of the borough's industrial demand, and the Council seeks to retain these – where they exist – within the BDTQ. It is noted that the certain distribution uses currently operating within the BDTQ, such as Gorillas and Deliveroo, are considered to be compatible with offices uses. That notwithstanding, the Local Plan also takes a protective approach to the borough's Locally Significant Industrial Areas (LSIAs, the equivalent of the London Plan's LSIS). Although it

is in principle permissible under the London Plan, the Local Plan does not allow for the co-location of industrial and non-industrial uses in the LSIA's. This is intended to protect such locations and to allow them to accommodate industrial uses above and beyond that which can be accommodated within the SIL, including logistics and distribution uses.

It is recognised that the London Plan provides for the introduction of non-industrial uses, such as offices, within SIL through a plan-led or masterplanning intensification, consolidation and release approach – as set out within Policy E7 and the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches. It is noted that such an approach, as per paragraph 6.7.2, is focused on the "release of some land for a mix of uses", whereas this is not the intention of the BDTQ initiative, which seeks to retain (and intensify) industrial uses on all sites. In this location, the approach is considered to be more akin to the co-location of industrial and non-industrial uses as promoted by the London Plan within the LSIS (as per Part B), supported by the requirements of LP37.C, which address issues over conflict between different uses.

Wandsworth is willing to work with officers of the GLA to consider whether redrawing the boundaries of the BDTQ (for example, to exclude the more traditionally 'SIL' heavy industrial uses, such as the Tarmac Trading Ltd site and the Abellio Bus Garage) would help to allay the Mayor's concerns. Alternatively, officers are also happy to consider whether it would be appropriate to re-designate parts of the BDTQ as LSIA to ensure compliance with the London Plan. The Council would need to be reassured that any such change would not diminish the importance attached to the ongoing industrial function of this area, recognising that there has been development interest in promoting other non-industrial uses within this location also. It is noted that, while Wandsworth takes a protective approach to its LSIA/LSIS industrial land elsewhere in the borough, the Local Plan nonetheless also proposes that the Summerstown LSIA is redesignated as SIL. This reflects the types of uses that occur within this location (including some 'traditional' SIL uses, such as the accommodation of waste), and supports the ambitions of paragraph 6.5.2 of the London Plan, which states that "To ensure that London can retain an efficient logistics function it is particularly important to secure and enhance strategic provision in SILs in ... the Wandle Valley in south London. This should be complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London".

Please note, the representation made reference to the removal of a sentence on the projected loss of industrial floorspace which was included in the Pre-Publication version of the Local Plan. This was removed as this figure was based on work done as part of the Employment Land and Premises Study; this work has now been updated as part of the HELAA and so was out of date. The latter document sets out the projected gains and losses as a result of known planning applications.

Proposed Change

No changes suggested as a result of this representation, however officers at Wandsworth are committed to working with those of the Mayor to resolve the latter's outstanding concerns with approach set out in the Local Plan.

Consultee Full Name

Nina Miles

Consultee Organisation Details

GLA

Agent Full Name

Agent Organisation Details

Comment ID

638

Title

LP35 Mixed-Use Development on Economic Land

Number

Policy 46

Soundness - Legally Compliant?

Soundness - Sound?

If not, why?

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Economic Use Intensification Areas (EUIAs), Economic Use Protection Areas (EUPA's) and Focal Points of Activity</p> <p>Wandsworth have a range of different employment designations. The LBW employment designations must not conflict with or undermine the London Plan's industrial designations and it would be helpful to make very clear the distinction between these designations and the London Plan SIL/LSIS designations.</p> <p>In light of comments above regarding the importance of demonstrating a spatial strategy to accommodate industrial needs, and noting the policy provisions within LP35 Mixed Use Development on Economic Land, and supporting text at para 18.42 regarding the overall provision of employment land, it is also considered important to continue to explore the potential for EUIAs, EUPAs and non-designated industrial sites as well as Focal Points of Activity to accommodate potential industrial intensification.</p> <p>As previously commented the introduction of non-industrial uses within industrial land outside of the strategic reservoir should follow the criteria set out in Policy E7C of the LP2021, where this is appropriate, and where this proposes co-location, should also follow criteria in LP2021 Policy E7 D.</p> <p>LBW's amendments to LP37 regarding definitions of affordable workspace to better align with Policy E3 of the LP are welcome. The distinction drawn with 'open workspace' is also noted.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted.</p> <p>The various economic land designations which are subject to policy requirements in LP35 (Economic Use Protection Areas; Economic Use Intensification Areas; Focal Points of Activity) are not considered to conflict with or to undermine the London Plan's industrial designations. In accordance with London Plan Policy E4.B, existing industrial uses in these locations (and elsewhere within the borough) meet the London Plan definition as 'Non-Designated Industrial Sites'. The approach to existing industrial land within these designations – within which the intensification of industrial provision is promoted the protection and full replacement is required, or the demonstration that there is no reasonable prospect of the site being use for industrial and related purposes (see LP34 parts C and D and LP35) – is considered to be consistent with London Plan Policy E7.C and E7.D (see also LP37), and it is noted that the policy requirements of the London Plan would also apply to redevelopment proposals in Wandsworth as they form part of the borough's Development Plan. The capacity for intensification in these locations is considered within the borough's Housing and Employment Land Availability Assessment (HELAA).</p> <p>None of the designations identified above overlap with the Strategic Industrial Locations (SIL) or the Locally Significant Industrial Sites (LSIS) / Areas (LSIAs), as clearly depicted on Wandsworth's Policies Map. Their relationship to the SIL and LSIS is set out in paragraph 18.40, while the relationship between LSIS and LSIAs is clarified in paragraph 18.27.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	

Comment ID	639
Title	LP33 Promoting and Protecting Offices
Number	Policy 44
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Offices Draft Policy LP33 sets out the borough's approach to the provision of new office space – promoting offices within the CAZ (i.e. the emerging Centres at Battersea Power Station and Vauxhall), and in Town and Local Centres, then in appropriate edge of centre sites allocated for offices, and lastly in Economic Use Protection Areas. This is in line with LP2021 Policy E1, the rationale is clearly explained through supporting text. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. The Mayor welcomes the explicit confirmation that this is in line with the Town Centre First approach and notes the additional reference to the London Plan's Town Centre Network in supporting text.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. Policies supporting the provision of walking, cycling and transport connectivity and capacity are set out elsewhere within the Local Plan, including LP49 (Sustainable Transport), LP50 (Transport and Development), LP52 (Public Transport and Infrastructure), and in the Area Strategies - which cover all of the borough's main centres.
Proposed Change	No changes considered necessary.
Consultee Full Name	Stuart Gulliver
Consultee Organisation Details	Albion Riverside
Agent Full Name	ms mandy wetherell
Agent Organisation Details	DPDS
Comment ID	640
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15

Soundness - Legally Compliant?	Yes
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Tall Building Zones 3.29 In terms of defining locations suitable for tall building development, paragraph B of Policy LP4 states that: "Proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2 to this Plan, where the development would not result in any adverse visual, functional, environmental and cumulative impacts." 3.30 Paragraph C adds that "Proposals for tall buildings will not be permitted outside the identified tall building zones" and Paragraph D states that: "Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area". 3.31 Policy LP4 is supported by Map 14.1 'Tall Buildings' which identifies the client's location of interest as being a 'Tall Building Zone' and some peripheries of the area as being a 'Mid-rise building zone' (see Figure 2 below)</p> <p>It must be highlighted, however, that the definition of a 'tall building zone' does not give developers carte blanche to apply speculatively for tall buildings of any nature in these zones. As set out in paragraphs B and D of Policy LP4, the proposals should not exceed the appropriate height range identified for each of the tall building zones as set out at 'Appendix 2' of the Plan. For absolute clarity, the client suggests that Appendix 2 is given a named title which can be properly referred to within the policy text, as some may consider the nature of an appendix to be supplementary guidance whereas in this case Appendix 2 sets out important policy criteria. 3.33 Notwithstanding the above suggestion, there is some concern with regards to the specific content of Appendix 2, in particular the identified 'prevailing' and 'appropriate' heights of buildings in the Battersea Bridge area. 3.34 The overall tall building zones for Battersea are identified within Appendix 2 at page 445 of the Local Plan (see Fig 3 below).</p> <p>The client's location of interest is labelled as 'TB-B2-04' and an inset map for this area, along with an adjacent area labelled 'TB-B2-03' is provided at page 447 of the Plan (see Fig 4 below)</p> <p>For the areas TB-B2-03 and TB-B2-04, Appendix 2 defines the existing prevailing height of buildings in the general area as being '3-18 storeys'. No specific reference is provided as to which existing buildings are at the upper limit of this threshold (18 storeys), but it is assumed by the client to refer to the recent riverfront development at 100 Battersea Church Road (also known as the Montevetro Building) and the two older high-rise apartment buildings located east of Battersea Church Road (circled in purple at Fig 5 below). These buildings are located specifically in the TB-B2-03 area, approx. 400m south-west of the client's specific location of interest (see Fig 5 below).</p> <p>There are no buildings of a comparable height to 18 storeys on the river frontage around Battersea Bridge. Going westward from Battersea Bridge, the nearest building of such height is the previously mentioned Montevetro Building, approx. 400m south-west of the client's property. Going eastwards from Battersea Bridge, one would need to travel well over a mile to the Battersea Power Station redevelopment area before seeing buildings comparable in height to 18 storeys. Given the scale of the existing Power Station building, this is considered a more suitable location for a cluster of development of this scale. 3.38 Indeed the Albion Riverside development at 8 storeys is the highest existing building in the Battersea Bridge vicinity, with all other buildings at an equal or lower height on this part of the riverside. The definition of a 'prevailing height' of 18 storeys as set out in Appendix 2 is therefore misleading for area TB-B2-04 and, if at all, only applicable to the cluster at the south-western most part of TB-B2-03 (see Fig 5). Appendix 2 also defines what would be an 'appropriate height' for new buildings in these areas (TB-B2-03 and TB-B2-04) and provides a suggestion of '7-12 storeys'. Again, the upper threshold of 12 storeys is considered to be a misleading appropriation for the area around Battersea Bridge where prevailing heights of existing buildings are at a maximum of 8 storeys down to 3 storeys. Application of Appendix 2 therefore currently leads applicants/developers towards a direct conflict with paragraph 2 of Policy LP4, which states that: "The proposed location of the tall building(s) must avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines..." [our emphasis]. 3.39 The client therefore strongly suggests that the descriptions at Appendix 2 of 'prevailing' and 'appropriate' heights for the areas immediately adjacent to Battersea Bridge (both east and west) are explicitly differentiated from the area further south which does indeed have a cluster of 18- storey buildings. It is clearly demonstrated by Fig 6 below that the riverside area around Battersea Bridge has an established low-medium rise character ranging from a maximum of 8 storeys on the east side down to just 3 storeys on the west side. The current blanket description of 12 storeys being an appropriate height in this location is wholly misleading and inappropriate. The client suggests that the prevailing and appropriate heights for the area around Battersea Bridge are specifically and more appropriately defined to reflect the established consistent character of this part of the riverside with regards to height. 3.41 The client would support a revision to Appendix 2 of the Plan which defines the riverside immediately east and west of Battersea as having a prevailing height of 3-8 storeys (as clearly demonstrated by Fig 6 above) and allowing for a maximum appropriate height of 8 storeys for any new development or redevelopment which may come forward on this part of the riverside. These suggested heights are considered to be suitable, taking into account the established character and townscape of the area, environmental impacts and amenity of existing residents. This representation has been drafted by DPDS Consulting Group on behalf of Mr Stuart Gulliver of Albion Riverside. 4.2 Overall, the client supports a restrictive approach to new buildings in Wandsworth Borough, however they have some specific concerns and suggestions regarding the soundness of certain policies in their current form. 4.3 The client supports the Council's decision not to allocate The Glassmill at 1 Battersea Bridge Road for</p>

	<p>redevelopment as a tall building. An allocation would be inappropriate given the recency of construction of the existing building and the fact that any redevelopment of the site would be piecemeal and premature. A tall building in this location would result in a lopsided townscape on the riverside location around Battersea Bridge, where prevailing building heights range from 3-8 storeys. 4.4 On this basis, the client strongly suggests that an amendment is made to Appendix 2 of the Local Plan, as referred to in Policy LP4 (Tall and Mid-Rise Buildings), which defines prevailing and appropriate heights for buildings in various zones across the Borough. As can be clearly seen from Fig 6 above, the riverside both east and west of Battersea Bridge has a clear low to medium-rise character; this continues for approx. 400m either side of the bridge. It is therefore considered wholly inappropriate and unjustified for the Local Plan to encourage new buildings at a height of 50% taller than the maximum existing height at this section of the riverside. This also directly contradicts paragraph 2 of Policy LP4, which states that the proposed location of tall buildings must “avoid creating substantial visual interruptions in areas with otherwise very consistent building heights and/or roof lines”. This contradiction means that the content of Appendix 2, as drafted in its current form, is not effective. 4.5 Appendix 2 of the Local Plan, as referred to in Policy LP4, should be amended such that the appropriate height at the riverside location around Battersea Bridge is capped at 8 storeys, allowing the existing townscape character of the area to be maintained. This would result in the content of Appendix 2 being justified and effective. 4.6 The client also has serious concerns regarding the absence of an explicit reference to wind impact in Policy LP4. The Plan is not considered to be positively prepared or effective in this respect. An explicit reference would ensure that developers give sufficient consideration to such impacts, not only for the direct benefit of new tall buildings but also to protect amenity and safety of adjacent buildings and open spaces. 4.7 We trust that these representations will be given due consideration during the examination of the Wandsworth Local Plan, however the client would appreciate the opportunity to attend the Examination in Public so they are able, if required, to provide further clarification on any of the comments raised in these representations.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>Appendix 2 forms part of the Plan and is not separate guidance. As mentioned, the words 'Appendix 2' are contained within policy LP4 and the full title 'Appendix 2 Tall Building and Mid-rise Buildings Maps' is contained in Appendix 2. This approach is considered to be sound.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. The shaded area of TB-B2-02 is lighter compared to that of TB-B2-03 which illustrates that lower storey heights of the identified range would be considered appropriate. Further detail of the approach for these zones is contained on page 182 of the UDS 2021. At application stage any development would also be required to meet the tall buildings criteria of LP4 which would assess the appropriateness of height at the site and justify that the development would not result in any adverse visual, functional, environmental and cumulative impacts in accordance with Part B of LP4.</p> <p>The consideration of wind impact is already a criteria of London Plan Policy D9 C3 (a) and its replication is not considered necessary in LP4.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	641
Title	Paragraph
Number	18.12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Paragraph 18.12 reflects the requirement figure for offices derived from LBW's ELPS 2020 of 22,500sqm, and this is described as being the figure for the whole borough – although elsewhere including at paragraph 18.3 and in the Consultation Statement this figure is described as the need specifically for the local/sub-regional market (i.e. excluding the Vauxhall Nine Elms Battersea Opportunity Area, on the basis that most office development in this location will serve a different market). It is not clear how this relates to the London Office Policy Review 2017 composite projection for 117,600m2 of office space up to 2041. This should be clarified within the supporting text so that it is explicitly clear what the spatial growth aspirations for office development are for the borough over the course of the Plan period.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. Wandsworth's Employment Land and Premises Study (ELPS, 2020) considered the two office markets that operate within Wandsworth separately: one relating to the Central London office market focused around the VNEB OA, and one concerning the local / sub-regional office market which is dispersed across the borough. Paragraph 18.12 describes the approach taken within the study to the identification of office floorspace need over the Local Plan period outside of the VNEB Opportunity Area. It is recognised that this is superfluous information for the Local Plan and is causing confusion. To remove such ambiguity, this paragraph should be amended such that the 22,500 sqm figure refers directly to the local / sub-regional market. The approach to the delivery of floorspace within the VNEB OA is addressed in paragraphs 18.8 and 18.9, which sets out that approximately 205,000 sqm of office floorspace is expected to have been completed by 2024 in this area and that the level of supply proposed is likely to provide for the future demand arising in the Central London office market. The composite projection for 117,600 sqm set out within the London Office Policy Review 2017 relates to Wandsworth borough as a whole and reference to it was included as part of the policy literature reviewing informing the ELPS 2020. Due to the different and more spatially specific approach taken within the latter, it is considered that reference to the London Office Policy Review 2017 demand figure is not necessary and could potentially be confusing.
Proposed Change	Amend paragraph 18.12 to read: <p>"The borough's ELPS indicates that there will be a net additional requirement for 22,500 sqm of office floorspace up to 2034 <i>in the local/sub-regional market</i>, once vacant floorspace and transitional vacancies have been factored in. While this figure represents the identified need for the borough as a whole, evidence of demand in the property market based on very low (2.8%) vacancy rates and positive net absorption rates for smaller units indicate that a considerable proportion of this demand is likely to be for office premises in the local/sub-regional</p>

	market. Consequently, the Local Plan has adopted an approach which focuses opportunities for increasing supply in this employment market in areas of the borough that are outside of the VNEB OA."
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	642
Title	LP40 Safeguarding Wharves
Number	Policy 51
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Safeguarded Wharves</p> <p>The Mayor welcomes Wandsworth's promotion of wharf sites to support the function of moving freight by river and recognition of the Safeguarded Wharves Review 2018-2019 which was granted approval by the Secretary of State in September 2020 and recommends the ongoing safeguarding of all five of Wandsworth's wharves including Smugglers Way, Pier, Kirtling, Cringle Dock and Middle Wharves.</p> <p>The Mayor's Transport Strategy also seeks to increase the proportion of freight moved on London's waterways and retaining safeguarded wharves is a key enabler of this.</p> <p>The Mayor welcomes the commitment to the safeguarding of the borough's five wharves in the draft Plan Policy LP40. This is in line with the LP2021 Policy SI 15 which requires (amongst other things) boroughs to protect existing locations and to support development proposals that facilitate an increase in the amount of freight transported on London's waterways. Part B of LP40 also includes appropriate policy tests which align with the objectives of Policy SI 15 including retaining access and ensuring no reduction to operational capacity.</p> <p>The addition of the reference to wharf uses now included in Part B of Policy LP40 is welcome.</p> <p>We note that paragraph 18.84 now includes a reference to the Safeguarding Directions for Wharves – although suggest that a minor change to drafting would be beneficial to avoid implying that the Direction only 'recommends' that all planning applications affecting safeguarded wharves be referred to the Mayor.</p> <p>In contrast to this largely positive policy position, the Mayor is concerned about how the policy is currently being translated into the site allocations at the following safeguarded wharves:</p>

	<p>Pier Wharf: Paragraph 4.173 Site Layout implies that the safeguarded wharf may be de-designated, and in this case a mixed-use residential scheme could come forward. Based on the Safeguarded Wharves Review which finds this wharf in active use – and</p> <p>noting its particularly high throughput relative to its size - the Mayor would object to this, as it would completely undermine its strategic long-term protection.</p> <p>Kirtling Wharf / Cringle Dock: Paragraph 5.29 should include a more specific commitment to safeguarding the wharf for the longer term, and a stronger wording would assist here – replacing ‘discussions’ [‘with relevant parties in particular the Port of London Authority...etc’] with ‘agreement of’.</p> <p>Middle Wharf: Paragraph 5.82 should include a commitment to the future use of the wharf for waterborne freight.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support for Policy LP40, and modifications made in response to the Mayor’s previous representation, are noted. It is agreed that changes should be made to paragraph 18.84 to avoid the unintentional implication that it is only recommended that planning applications affecting safeguarded wharves are referred to the Mayor.</p> <p>The site allocations concerning safeguarded wharves are to be read in conjunction with Policy LP40, and therefore parts A (concerning the loss) and B (concerning the redevelopment and retention of the operational capacity of the wharf) would both apply to any proposals for these sites.</p> <p>Paragraph 4.173 is only applicable in instances where Part A of Policy LP40 has been satisfied, and it is noted that the allocation itself is as a safeguarded wharf. The approach is not intended or considered to undermine its strategic protection. To clarify this, however, reference should be made to LP40.</p> <p>Paragraph 5.29 is considered to sufficiently refer to LP40, and it is not necessary to repeat those requirements further. It is agreed that reference to requiring the agreement of the PLA, GLA and Thames Water is appropriate. A similar change should be made to paragraph 5.82 for consistency.</p> <p>It is not considered necessary to add reference to the future use of the site for waterborne freight as the site allocation requires that development must "retain or enhance wharf capacity and operability" and that it must not "result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf."</p>
Proposed Change	<p>Amend paragraph 18.84 as follows:</p> <p>"...The Secretary of State's Safeguarding Directions for wharves identified in took forward the <i>recommendations of the</i> Implementation Report - Safeguarding Wharves Review 2018-2019 recommended that this status is retained for all this status is retained for all of Wandsworth's wharves, and that all planning applications affecting safeguarded wharves must be referred to the Mayor."</p> <p>Amend paragraph 4.173 as follows:</p> <p>"Should the safeguarded wharf be de-designated (<i>in line with LP40 - Protected Wharves</i>) then a mixed-use residential scheme could come forward."</p> <p>Amend paragraph 4.173 as follows:</p> <p>"Development of these or adjacent sites will require further discussions with relevant parties, in particular <i>including the agreement of</i> the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water..."</p> <p>Amend paragraph 5.82 as follows:</p>

	"...will require further discussions with relevant parties, in particular <i>including the agreement of</i> the PLA and the GLA, and a..."
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	643
Title	LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses
Number	Policy 70
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Thames Policy Area (TPA) The Mayor notes that the Policies Map includes the precise boundary of the Thames Policy Area in line with Policy SI 14 and that VNEB and Battersea has been removed from the list of Focal Points of Activity.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No changes considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	

Agent Organisation Details	
Comment ID	644
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Design</p> <p>The Mayor welcomes the borough's commitment to ensuring that new development supports the creation of a coherent and high-quality built environment as a key component of the Local Plan with a policy approach underpinned by a deep understanding of the values, character and sensitivity of different parts of the borough.</p> <p>The Mayor questions the deletion of references to ensuring that service access including for regular maintenance, waste collection, deliveries is separated from the primary access locations and screened away from key public areas, and he would point to London Plan 2021 Policy T7 Part G which seeks safe, clean, and efficient deliveries and servicing through the provision of space for services, deliveries and storage off-street.</p> <p>As noted above, the GLA is developing a number of pieces of London Plan Guidance which can be accessed at: https://consult.london.gov.uk/hub-page/london-plan-guidance-2. Current guidance out for consultation includes Fire Safety Guidance and a suite of Design and Characterisation Guidance which may be of use when further refining the policy and development of any future guidance.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. References to ensuring that service access including for regular maintenance, waste collection, deliveries is separated from the primary access locations and screened away from key public areas, is now contained in LP2 - General Development Management Principles.
Proposed Change	No change required

Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	645
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Tall Buildings</p> <p>The Mayor welcomes the clear whole-borough definition of a tall building proposed within Policy LP4 Tall and Mid-Rise Buildings. This is set at 7 storeys or 21m to the top of the building, which derives from the Urban Design Study (2021). This accords with LP2021 Policy D9. He further welcomes the clear approach regarding the specific locations of such tall buildings, being those set out on in designated zones (clearly indicated on maps in an appendix to the plan) with a clear policy that tall buildings outside of these areas will not be acceptable – and that within these zones proposals need to meet the specified criteria.</p> <p>The Mayor also notes the additional policy approach of defining ‘mid-rise’ buildings of 5 storeys (or 15 metres) which will provide welcome clarity.</p> <p>Appendix 2 sets out clear appropriate heights in metres and storeys – expressed as a range, using a heat-map style visualisation to express appropriate heights within a range. This is clear and is supported.</p> <p>The Mayor also commends LBW for its new policy provision at B6 of Policy LP4, which responds to previous comments regarding provisions to preserve the Outstanding Universal Value (OUV) of the Westminster World Heritage Site (WWHS). This requires development proposals which affect the setting and approaches of the WWHS to address all parts of the criteria set within part B of Policy LP3 which creates a clearer framework for proposals to demonstrate that they preserve the Outstanding Universal Value of the Westminster World Heritage Site.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	

Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	646
Title	LP3 Historic Environment
Number	Policy 14
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Heritage</p> <p>The Mayor welcomes the borough taking a plan-led approach to future growth based on a clear understanding of local character which is in line with the approach to good growth that underpins the LP2021.</p> <p>Draft Plan Policy LP3, and the new addition of part B is particularly welcomed. This new provision responds to previous comments and sets out a policy approach for those applications which may affect the setting and approaches of the WWHS. It details how development proposals should demonstrate that they will conserve, promote, actively protect and interpret the OUV of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.</p> <p>As noted in supporting text at paragraph 14.25 LBW is a stakeholder borough along with other adjacent boroughs in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World Heritage Site and its setting, although it is not made explicit whether LBW is part of the WHS Steering Group that contributes to the management of the site – which could usefully be clarified.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	

Council Response	Support noted. The council is part of the WHS steering group and the suggested clarification has been proposed.
Proposed Change	Amend paragraph 14.25 to read: "Wandsworth is a stakeholder borough (along with adjacent boroughs) in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World Heritage Site and its setting <i>as a member of the WHS Steering Group</i> ."
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	647
Title	LP45 Evening and Night-Time Economy
Number	Policy 56
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Evening and night-time economy The Mayor welcomes reference to his Night-Time Economy Classifications and notes that while reference has been made to Clapham Junction which has an NT2 classification, Vauxhall (which also has an NT2 classification) does not appear to have had similar references included.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. Based on an analysis of the type of developments coming forward within the north-eastern part of the borough (Nine Elms), the potential CAZ retail cluster at Vauxhall identified within the London Plan (as being in both Lambeth/Vauxhall) is not considered to be located within the borough of Wandsworth. This has been agreed with officers at the London Borough of Lambeth, and is reflected in the recently adopted Lambeth Local Plan 2020-2035 as 'Vauxhall Cross' in Policy PN2: Vauxhall.
Proposed Change	No change considered necessary.
Consultee Full Name	Mr

	James Thompson
Consultee Organisation Details	Director Northport FPR Limited
Agent Full Name	Mr Kevin Goodwin
Agent Organisation Details	KG Creative Consultancy
Comment ID	648
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Fawe Park Road, Putney Background 1. The subject site is located on the south side of Fawe Park Road to the rear of the houses in this road, together with two houses in the road and is located to the north of the existing railway lines that connect Clapham Junction and Putney railway stations and beyond. 2. The site was discussed as part of a pre-application submission, was promoted as a residential designation through the 'call for sites' in December 2018 and also through the most recent Regulation 18 consultation in February 2021. 3. Our submissions to the Council in respect of the Regulation 18 consultation are attached as Appendix A. 4. It should also be noted that Network Rail who part own the subject site, as former railway land, also made representations on that draft plan also seeking the designation of the subject site for residential purposes. It is a surplus asset. Councils response to Reg 18 Submissions 5. The Councils response to our clients submission on this version of the plan are found in two locations. Firstly in the Pre-Publication Draft Local Plan Consultation Statement - Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Response (January 2022) and secondly in the Site Allocations Methodology Paper (January 2022). 6. The Councils response in the first document simply states under the heading 'Response' "Land to the southside of Fawe Park Road is a designated SINC. Consequently, it is inappropriate to promote as a site allocation within the Local Plan". The 'Outcome' then states "No change to the Local Plan required as a result of this representation". The Council in their second document refers to the site allocation proposed through the Reg 18 version of the local plan in their Methodology Paper. We reproduce the relevant extract below:</p> <p>Again this is a 'stock' response that fails to have any regard to the circumstances that relate to the site as they are today as opposed to when the Council designated the SINC here decades ago, without as far as we are aware stepping foot in this part of the site. Network Rail maintain records of access requests to their land, so we are aware that none have been applied for by the Council or any other body, aside from our clients team. 9. The GIGL (Greenspace Information for Greater London) extract within the Councils document suggest that it contains information as of May 2020. However some of the records of priority species have suggested that the most recent records are from up to a decade ago. Even the record for the stag beetle dates from 2019. This in itself is questionable as there is no public access to the site at present sufficient to be able to observe something the size of a stag beetle on the site. The SINC boundary on the GIGL extract also refers to a site that itself extends beyond the area the subject of this submission. 10. The GIGL site name is also accompanied by an asterisk that is referred to in the margin of the extract record and states "Can be viewed only from adjacent paths or roads only". Firstly it should be noted that in this respect the extent of the GIGL site is greater than the subject site, extending to the west and south west of the former railway viaduct. Secondly that the only public location where any of the subject site can be viewed from a static location is the footbridge between Fawe Park Road and Woodlands Way. The only other view is from a passing train. 11. We therefore question how the existence of a Stag Beetle on the subject site could have been identified on the subject site in 2019 and therefore this may relate to adjoining land that forms part of the wider existing SINC designation. 12. In our view the list of Priority Species, given in particular the age of some of these records, the fact that no access has been requested and that the SINC site boundary is wider than the subject site cumulatively represents an unreliable source upon which to base a SINC designation, on at least the subject site. 13. On a final point in relation to the reliability of this data source it</p>

	incorrectly categorises as Neutral grassland (semi-improved); something that the site cannot be described as.14. Therefore it is solely on the basis of this erroneous SINC designation, supported by out of date data that the proposed designation by our client has been previously rejected. It is in reality an available and deliverable housing led site.
Change(s) considered necessary	The inclusion of the subject site as a site designated for residential use together with appropriate biodiversity improvements and landscaping -see details in the attached statement.
Wishes to attend Hearing Session	No, I do not wish to participate in hearing session(s)
Reason why	The responder considers that the Council has failed to have adequate regard to the material that the responder has provided to date. The Council have sought to rely upon information that is years, if not decades old and has not physically been on the subject site themselves. It has dismissed the proposal on the basis of dated information.
Council Response	All railway line sides in the borough and any contiguous associated land (with one or two exceptions) were designated as SINC based on survey data at the time demonstrating their key role for connectivity within the borough along with habitats and species supported. There are a significant number in the borough due to some tube lines being above ground and multiple overground lines coming into Clapham Junction (which makes us different from many other boroughs). LP53 protects all areas of open space will only be permitted where it does not harm the character, appearance or function of the open space. If the applicant wished to pursue a development on this land then the application would be considered at application stage as the Council maintains that this site is protected open space and not suitable for a site allocation as proposed by the resposdee. The proposed site also contains other planning, transport, and access issues which do not make it appropriate for allocation within the Local Plan.
Proposed Change	No change considered necessary

Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	649
Title	LP14 Air Quality, Pollution and Managing Impacts of Development
Number	Policy 25
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Air quality</p> <p>The Mayor notes the additional references to updated dates of the borough's Air Quality Action Plan (AQAP) in the supporting text, (and that the AQAP sets out the Air Quality Focus Areas. LBW may find recently published consultation drafts of London Planning Guidance on Air Quality Neutral and Air Quality Positive which may support the borough in its promotion of air quality neutral development. These can be found here: https://consult.london.gov.uk/air-quality-neutral.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	

Comment ID	650
Title	LP57 Urban Greening Factor
Number	Policy 68
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	Urban greening The Mayor welcomes Wandsworth's decision to follow the urban greening factor approach as set out in Policy G5 of the LP2021, and notes the future commitment to a future review.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changes considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	651
Title	Sustainable Transport
Number	20
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Transport</p> <p>The Mayor welcomes the focus on the need to manage traffic and provide good public transport connectivity, as well as support active travel and the support for the 15-minute neighbourhood. He welcomes the references to Healthy Streets, Vision Zero road safety objective and active travel. The Mayor's Sustainable Transport, Walking and Cycling LPG may support the borough further in its efforts to identify walking and cycling networks, and any gaps and potential improvements.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Nina Miles
Consultee Organisation Details	GLA
Agent Full Name	
Agent Organisation Details	
Comment ID	652
Title	Paragraph
Number	6.19
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Clapham Junction Opportunity Area</p> <p>The policies map changes document now clearly designates the boundary of the Clapham Junction OA, and this is also shown in the Clapham Junction and Winstanley/York Road Regeneration Area Map 6.1. The indicative growth figures set out in Table 2.1 LP2021 have also been referenced in para 6.19 of the supporting text to the Clapham Junction and York</p>

	Road/Winstanley Regeneration Area – and the comment that the indicative growth figures are expected to be exceeded due to the inclusion of the wider Winstanley/York Road area is noted.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted
Proposed Change	No change considered necessary

Consultee Full Name	Spencer Jefferies
Consultee Organisation Details	Town Planner National Grid
Agent Full Name	Matt Verlander
Agent Organisation Details	Director Avison Young
Comment ID	653
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p>Electricity Transmission</p> <p>Development Plan Document Site Reference</p>

Asset Description**Policy WT9:** Feather's Wharf, The

Causeway, SW18

0Kv Underground Cable route: KENSAL GREEN - WIMBLEDON 2**Policy WT10:** Land at the Causeway, SW18**0Kv Underground Cable route:** KENSAL GREEN - WIMBLEDON 2**Policy WT4:** Hunts Trucks, adjoining sites including Gasholder, Armoury Way, SW18**Electrical Substation:** WANDSWORTH HEAD HOUSE**0Kv Underground Cable route:** KENSAL GREEN - WIMBLEDON 2**Policy WT2:** Ram Brewery / Capital Studios

/ Former Dexion / Duvall site, Ram Street / Armoury Way, SW18

0Kv Underground Cable route: KENSAL GREEN - WIMBLEDON 2

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

Change(s) considered necessary**Wishes to attend Hearing Session****Reason why****Council Response**

Comments noted. The information provided would be considered as part of an application and therefore it is not considered necessary not consistent to provide information on national grid assets within the Site Allocation.

Proposed Change

No change considered necessary.

Consultee Full Name

Mr
James
Thompson

Consultee Organisation Details

Director
Northport FPR Limited

Agent Full Name	Mr Kevin Goodwin
Agent Organisation Details	KG Creative Consultancy
Comment ID	659
Title	Area Strategy for Putney
Number	7
Soundness - Legally Compliant?	No
Soundness - Sound?	No
If not, why?	Positively prepared Effective Consistent with national policy
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Proposed Site Allocation 15. The subject site at Fawe Park Road has been proposed for residential development. That proposal however also retains an area for landscaping and biodiversity. This submission is accompanied by the following plans and document:</p> <ul style="list-style-type: none"> • Site location plan; • Illustrative layout, retaining land for biodiversity; • Illustrative landscaping plan; Wandsworth Local Plan Review Northport FPR Limited 4 • Preliminary Ecological Appraisal; • Protected Species Survey Report; and • Biodiversity Report. <p>16. The site is former railway land with part of a former railway viaduct and embankment remaining in place. The line itself that enabled trains to cross the main line has long been removed as has the rail bridge across the main lines. Through the demolition of two houses on the south side of Fawe Park Road access can be provided to the subject site for its redevelopment for some residential development.</p> <p>17. The subject site is available and achievable for residential development. The issue between our client and the Council is its suitability. The Council has taken the view that its designation as a SINC is an impediment to its suitability, whereas based upon the proper and up to date information it is not considered that this is the case.</p> <p>18. The Councils draft plan through Policy SDS1 states "Within the period 2023 – 2038 the Local Plan will provide for a minimum of 20,311 new homes. This includes the provision of a minimum of 1,950 new homes per year up until 2028/2029, including on small sites".</p> <p>19. From the Councils SHELAA document (January 2022) they have estimated that they will be able to deliver 24,381 homes between 2023/4 and 2037/38, more than the minimum number required. However the level of delivery as indicated in Table 4 of this document shows a significant decline in delivery on all sites post the first five years. Even in the first five years there is a significant reliance on large sites.</p> <p>20. From Appendix A, Table 9 of that document we can see that on large sites the majority of this delivery is expected to occur on sites within Nine Elms, then Clapham Junction and then Wandsworth (Town). The subject site is located within Putney where only 130 dwellings are expected to be delivered on large sites in the first five years of the plan (2023/24 – 2027/28).</p> <p>21. Other than in Tooting and Balham this is the lowest level of expected delivery by area in this plan period. Delivery of housing here will provide some balance to this factor and delivery both market and affordable housing in those early years.</p> <p>22. Policy SDS1B suggests that Putney has a housing capacity of 203 new homes during the plan period. This is a matter that we dispute given the availability of the subject site and its delivery capability, even retaining land for biodiversity. Policy PM5B is Wandsworth Local Plan Review Northport FPR Limited 5 also relevant in that it also refers to "Development in Putney</p>

will help meet the borough's housing target, as set out in Local Plan Policy SDS1. The area has capacity to provide 200 homes by 2032/33, over the first 10 years of the Plan period". In our view this is a very low level of delivery for an accessible and sustainable area.

23. Map 7.1 shows that the Area Strategy Boundary for Putney includes most of the subject site – see extract below and the blue dashed line:

24. This Map also identifies the location of the six allocated sites within the Putney area. Whilst not on the extract above these are all located along the High Street or just off this street in Putney, to the north west of the subject site. They are all mixed use schemes with residential likely provided for only on upper floors, given the town centre location.

25. The Councils 'Wandsworth Local Housing Needs Assessment (December 2020) refers to the housing mix need in the Borough. It indicates at Table 30 that the greatest need in the market sector is for 3+ bedroom units at 58% of total need. For affordable need the reverse is the case, with the greatest need for smaller units.

26. Therefore to deliver the market housing sector need, larger properties, often with gardens are needed. Consequently with these can be provided where land is more spacious, rather than in locations such as Nine Elms and Battersea. The smaller units to meet the affordable need will then complement the market need. But it is unlikely that any of the mixed use allocations in Putney will meet this need.

27. This approach to supporting the need for family sized accommodation given the need for this size of accommodation, which is also found in existing adopted policy, supports the restraint to the loss of family sized accommodation through conversion. Wandsworth Local Plan Review Northport FPR Limited 6

28. The proposals for the subject site will meet both needs with the delivery of larger family sized houses and also smaller affordable housing, all in a well landscaped and biodiversity setting.

29. We have been working on the delivery of the site for some time and up to date ecological surveys have been undertaken to establish the true value of the site in ecological and nature conservation terms.

30. An indicative layout plan is provided that shows how the site could be developed as indicated.

31. The submissions are also supported by a Biodiversity Impact Assessment (BIA), a Protected Species Survey Report and a Preliminary Ecological Appraisal (PEA). These were all prepared in the context of the development proposals for the site.

32. The PEA concludes that: "Mitigation actions for several ecological receptors on site have already been identified and should be included in a CEMP (secured by planning condition), including:

- The retention of as much of the habitat that qualifies the site as a SINC;
- Measures to protect the other SINC's during construction;
- Provision of a bat sensitive lighting regime;
- Removing vegetation outside of the nesting bird season;
- Removing dense vegetation using a two-phase approach to protect small mammal species; and

33. The Protected Species Report concludes: Upon successful implementation of all mitigation compensation and enhancement measures, the development proposals are considered to result in either neutral or positive impacts on each of the specified ecological receptors during both the construction and operational phase of the development, and proposals are considered to be in full compliance with legislation and policy surrounding the protection of protected species and green infrastructure. Furthermore, the function of the SINC as a wildlife corridor will be maintained. Wandsworth Local Plan Review Northport FPR Limited 7

34. As indicated in this extract from the report conclusions even with the indicative proposals in place the function of the SINC as a wildlife corridor will be maintained. In this respect those aspects of the site of any value for nature conservation can be maintained with the proposed indicative layout through a suitable buffer between built development and the railway edge.

35. Accordingly its designation as a SINC is not a reason for the Council not to allocate the site for residential development. However that designation does need to be revisited in light of the most up to date data.

36. A BIA has been undertaken in respect of the subject site and concludes that "The scheme [is] considered to be maximising the opportunity for onsite ecological enhancement in light of the development proposals..... Detail relating to the proposed ecological compensation and enhancement actions in relation to habitat creation and long-term management should be provided within an Ecological Management Plan (EMP) for the site which could be secured through planning condition. Should these recommendations be adhered to, the proposals stand to be compliant with legislation and current planning policy".

37. It is therefore considered that these reports provide the most informed information as to the nature conservation value of the subject site today, rather than relying on erroneous data from years ago. This differs from the value attributed to it by GIGL and Wandsworth in seeking to maintain at least part of the area as a SINC. The site is capable of accommodating residential development as proposed that will be of significant benefit to the delivery of housing within the Borough over the plan period. Indeed it can deliver housing within the first five years of the plan.

38. Further this can be achieved with improvement of the existing value of the site and with enhancement of the ecological value, particularly at the western end where it adjoins the residual extent of the existing nature conservation designation. It will also allow for the retention of a landscape buffer parallel with the railway between the proposed built development and the railway edge.

	<p>39. The site has a PTAL of 4, providing good access to mainline services at Putney Station to the west (c750m) and to the underground at East Putney Station to the south west (c460m). There are also five bus routes within c450m of the site on Putney Bridge Road and Upper Richmond Road.</p> <p>40. There are shops and services at East Putney and a wider range at Putney itself. The subject site is located within a sustainable location. Wandsworth Local Plan Review Northport FPR Limited 8 Recommendation</p> <p>41. Designate the site in the draft Wandsworth Local Plan Review as a residential led development site with areas set aside for retention and enhancement for nature conservation, biodiversity and wildlife corridor</p>
Change(s) considered necessary	The inclusion of the subject site as a site designated for residential use together with appropriate biodiversity improvements and landscaping -see details in the attached statement.
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	The responder considers that the Council has failed to have adequate regard to the material that the responder has provided to date. The Council have sought to rely upon information that is years, if not decades old and has not physically been on the subject site themselves. It has dismissed the proposal on the basis of dated information.
Council Response	<p>All railway line sides in the borough and any contiguous associated land (with one or two exceptions) were designated as SINC based on survey data at the time demonstrating their key role for connectivity within the borough along with habitats and species supported. There are a significant number in the borough due to some of the tube lines being above ground and multiple overground lines coming into Clapham Junction (which makes us different from many other boroughs).</p> <p>The Council considers this site to be open space and it is to be protected as such. The site also contains other planning, transport, and access issues which do not make it appropriate for allocation within the Local Plan. Responding to every issue would not be feasible as part of a response to a Local Plan representation however applicants are able to organise pre-application consultations with the council to discuss the potential of the site in more detail.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	660
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No

Details of reason(s) for representation	<p>WANDSWORTH LOCAL PLAN (Regulation 19)</p> <p>A submission by Wandle Valley Forum to London Borough of Wandsworth</p> <p>February 2022</p> <p>1 Wandle Valley Forum provides support and an independent voice for over 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. Many of our supporters are based in Wandsworth.</p> <p>1 Wandsworth takes its very name from the Wandle and includes an important part of the Wandle Valley Regional Park and a significant length of the River Wandle, including its mouth in the Wandle Delta. The Wandle Valley is a major strategic environmental and heritage asset for the Borough and the site of major industrial estates and much employment. The network of Wandle-related open spaces and the Wandle Trail are especially important for the quality of life in Wandsworth and provide an economic opportunity drawing on the area's environmental quality. It also provides the means to connect important areas of the Borough, including Wandsworth Town Centre and the Thames, and to support active travel and mental wellbeing.</p> <p>We have established our priorities for the Wandle Valley in the Wandle Valley Forum Charter. This is grounded in the views of community groups, voluntary organisations and local businesses that support us. It sets out a number of issues to be addressed through development plans in the Wandle Valley, including Wandsworth's Local Plan</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	661
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified

	Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	<p>Overall approach</p> <p>There is much to welcome in the Local Plan and its treatment of the Wandle Valley. We particularly welcome explicit recognition of the Wandle Valley in the Wandle Valley Area Strategy and Wandsworth Town Area Strategy but more needs to be done to make the Wandle more of a centrepiece of the new Wandsworth Local Plan. The strategic opportunity provided by the Wandle is addressed in only a limited way by the Plan's lengthy Vision to 2038 and mainly through its economic role. It is worryingly absent from the Plan's environmental, social and economic objectives and the river is not included in the Key Diagram. For the reasons provided in these representations we do not consider the Wandsworth Local Plan to be sound.</p> <p>We raised a significant number of issues and opportunities for strengthening treatment of the Wandle Valley in representations on the earlier draft Local Plan. It is disappointing that so few have been taken on board. It is also of concern that our representations went unacknowledged and were absent from the summary of representations and Statement of Consultation when the revised Plan was published. This was rectified when we raised the issue but this also demonstrated the very limited way in which our representations have been considered.</p> <p>It appears to be Wandsworth Council's view that the Wandle is adequately addressed in the Plan, its Area Strategies and the Wandle Delta Masterplan. This attention is welcome but we believe the rest of the Wandle should also be the focus of its own Masterplan and this will support delivery of Area Strategy PM10 Wandle Valley. This Masterplan should be identified in Policy SDS1.</p> <p>The Plan also needs to contribute to a consistent approach in Merton, Sutton and Croydon which share the Wandle. This requires a mechanism to ensure wider co-operation with neighbouring local planning authorities.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>The Key Diagram is intended to bring together the main components of the spatial strategy of the Plan. It is considered that the River Wandle is given appropriate consideration in the Local Plan with the Wandle Delta Masterplan SPD providing for a range of enhancements over the plan period and the Wandle Valley Chapter providing specific guidance for the area for any new development that might come forward.</p> <p>While the Wandle Valley Forum comments were absent from the initial release of the Statement of Consultation they were included in a later release and those representations were taken into consideration as part of the Regulation 19 draft of the Local Plan.</p>
Proposed Change	No change considered necessary

Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	662
Title	Area Strategy for Wandsworth Town
Number	4
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Area Strategy – Wandsworth Town 8. We welcome recognition of the central contribution played by the Wandle in defining the character and identity of this part of the Borough and the contribution it can play in building physical and other connections that support the vitality and viability of Wandsworth Town Centre. We agree with the view that <i>“its potential remains underutilised”</i> (paragraph 4.14). 9. We have identified the following principles as part of the masterplanning process for the Wandle Delta and note that in the outcome of public engagement over the Masterplan the <i>“most frequently made comment was to deliver the Wandle Trail”</i> (paragraph 1.5.5).
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum

Agent Full Name	
Agent Organisation Details	
Comment ID	663
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Our principles and this support could be more emphatically supported in Policy PM2. We recognise and welcome Policy PM2's statement that " <i>the Council will require the creation of pocket and linear parks and more natural green spaces focused along the River Wandle and Bell Lane Creek. These should support nature through encouraging biodiversity and providing appropriate habitat, as well as making animated riverside spaces which encourage users to dwell</i> " but this could go further. For example, just as " <i>development proposals should demonstrate how the opportunities provided by the Wandsworth Gyrotory proposals have been maximised in terms of enhancing connectivity</i> " so they should demonstrate how they have taken opportunities to extend and enhance the Wandle trail. These should not be left only to Wandsworth Council to support. There should also be specific policy support for a "parklet" on the east bank of the Wandle where it meets the Thames to reinforce its inclusion in Map 4.1 for Wandsworth Town Centre. Both the Policy and the Key Diagram should also explicitly reference the need to enhance The Spit.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Map 4.1 does identify the inclusion of an area of open space at the point where the Wandle River joins the Thames. Paragraph 4.90 of site allocation WT9 Feather's Wharf also includes reference to this Open Space. The Local Plan is supported by the Wandle Delta Masterplan SPD which sets out in greater detail enhancements to the River Wandle. The existing wording of PM2 is considered sound.
Proposed Change	No change considered necessary.
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	

Comment ID	664
Title	WT20 Southside Shopping Centre, Wandsworth High Street, SW18
Number	Statement 20
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Site allocation WT20 references the relationship between Southside Shopping Centre and the Wandle and this could be significantly strengthened. Currently the river runs for c400m beneath the existing building and this is the longest covered stretch along its course. There are opportunities to daylight the Wandle as part of any redevelopment and for the presence of the river to lead the design of any new scheme. We ask that this is addressed more assertively than " <i>opportunities should be explored</i> " (paragraph 4.159) in a revised site allocation which explicitly promotes daylighting of the Wandle. This would be consistent with London Plan Policy SI 17.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The existing wording is considered sufficient, intentionally flexible and is in line with London Plan Policy SI 17.
Proposed Change	No change considered necessary.
Consultee Full Name	Workspace Group
Consultee Organisation Details	Workspace Group PLC
Agent Full Name	Freddie Clarke
Agent Organisation Details	Planner Avison Young
Comment ID	665
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	

Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Representations to the Draft Local Plan: Publication Version</p> <p>65 Gresham Street London EC2V 7NQ</p> <p>T: +44 (0)20 7911 2468 F: +44 (0)20 7911 2560 avisonyoung.co.uk</p> <p>We write on behalf of our client, Workspace PLC, to provide representations on the London Borough of Wandsworth (LBW) 'Publication' Draft Local Plan (Regulation 19).</p> <p>This representation is made in relation to two sites: Havelock Terrace, located within the draft Battersea and Technology Quarter site allocation and Morie Street Studios, located within the draft Ferrier Street Industrial Estate site allocation.</p> <p>This representation starts by setting out the previous representations made in relation to both sites. General comments are then made on the Tall Buildings Policy, followed by specific comments on the draft Battersea and Technology Quarter site allocation and the Ferrier Street Industrial Estate site allocation.</p> <p>This representation is supported by a Townscape Note, included at Appendix I, prepared by Cogent Heritage. This Townscape Note provides technical evidence in support of increased height ranges for the draft Battersea and Technology Quarter site allocation, within Tall Building Zone TB-B3a-01 and increased flexibility for differing height arrangements within the draft Ferrier Street Industrial Estate site allocation and Tall Building Zone TB-G1d-03.</p> <p>Background</p> <p>We have previously submitted representations on the Draft Local Plan 'Pre-Publication' version in March 2021 in relation to both sites, which are included at Appendix II and III and can be summarised as follows:</p> <p><u>Havelock Terrace</u></p> <ul style="list-style-type: none"> • Draft site allocation supported in principle and Workspace can confirm that the site is deliverable in the short to medium term as confirmed through pre-application discussions held with the LBW. • Several comments were made regarding introducing flexibility into the site allocation relating to ground floor uses, active travel requirements and active frontages to avoid constraining the design process. • It was suggested that the wording of the allocation should be updated to clearly demonstrate that the site is suitable for a tall building. This is critical given the changes to the Publication London Plan Policy D9 which requires that tall buildings are located in locations identified as being suitable within a development plan. We note this has been picked up, but we have further comments as set out below. <p><u>Morie Street Studios</u></p>

- Suggested that the land use requirements should be updated to provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) or office (use class E) to provide greater flexibility and avoid precluding the redevelopment of the site.
- It was noted that a connection through the Morie Street Studios site is not feasible and would risk precluding the future redevelopment of the site. This is because any link through the site will take up a disproportionate quantum of ground floorspace which would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site. This is discussed further below.
- It was noted the site was not identified in a location with opportunities for tall buildings on the tall buildings maps in Appendix 2 of the draft Plan despite the allocation and tall buildings study confirming it should be. We note this has now been rectified.

These latest representations focus on the key issues relating to both sites and do not seek to reiterate minor points previously raised, although we note that in our view all changes proposed in our previous representations should be picked-up to ensure that the site allocations provide the best opportunity for sustainable development.

Summary

We look forward to seeing how the 'Publication' Local Plan progresses through to examination and we appreciate the opportunity to submit further feedback.

We would appreciate it if you could provide confirmation that the response has been received. Please let us know if you have any questions.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	To discuss the proposed amendments to the draft allocations as set out in our reps, subject to further changes made prior to the hearings.
Council Response	<p>Comments noted.</p> <p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary.

Consultee Full Name	Workspace Group
Consultee Organisation Details	Workspace Group PLC
Agent Full Name	Freddie Clarke
Agent Organisation Details	Planner Avison Young
Comment ID	666
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Tall Building Policy</p> <p>'Publication' Draft Local Plan Policy LP4 (Tall and Mid-rise Buildings) now states that buildings which are 7 storeys or over, or 21 metres or more, will be tall buildings. The policy identifies tall building zones where tall buildings will be appropriate. The identification of tall building zones is welcomed and ensures that the draft policy complies with London plan Policy D9 Part B by determining locations where tall buildings may be appropriate and identifying locations on maps in the Development Plan.</p> <p>However, Part D of Draft Policy LP4 states that proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zone as set out at Appendix 2 of the draft Plan. This wording should be amended as follows:</p> <p><i>'Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan, unless it can be clearly demonstrated that this would not result in any unacceptable adverse impacts, including on the character and appearance of the local area.'</i></p> <p>This wording will ensure that there is greater flexibility for additional height in appropriate areas within the Borough.</p> <p>This wording is supported by the recent High Court decision (Case Number CO/1683/2021) at the Former Master Brewer Site where the London Borough of Hillingdon (LBH) sought judicial review of the decision made by the Mayor of London on 30th March 2021 to grant planning permission for buildings up to 11 storeys in height. LBH claimed that the Mayor of London misinterpreted Policy D9 of the London Plan by concluding that, notwithstanding conflict with Part B of that policy, tall buildings were to be assessed for policy compliance against the criteria in Part C.</p>

The Judge noted that the Mayor acknowledged in his decision that the proposal did not fully accord with London Plan Policy D9 as it had not been identified as suitable in the Development Plan under Part B. However, the Judge added that the mayor determined that the proposal accorded with the provisions of the Development Plan when read as a whole and that it was planning judgement, based on the benefits of the proposal. This ground for judicial review was therefore not successful.

It is therefore clear that even if a site has not been identified within the Development Plan as a suitable location for tall buildings in accordance with Part B of London Plan Policy D9, it is wrong to interpret the policy in a way that automatically treats proposals for tall buildings as contrary to the Development Plan. Instead, proposals should be assessed against the criteria within Part C and considered within the planning judgement.

The proposed building height thresholds set out in the plan have been informed by an Urban Design Study (2021) prepared by Arup. The assessment provides a borough wide review and sets potential indicative height thresholds. However, it does not have the benefit of detailed technical and environmental analysis that is required to support a full planning application which can better identify appropriate building heights on a site-specific basis.

The wording of draft Policy LP4 should therefore be amended as above to ensure that even if building heights are not identified as suitable within the Development Plan, they should still be assessed against the relevant policy criteria.

The Townscape Note, included at **Appendix I**, provides an overview of the Urban Design Study, which was prepared by Arup and which forms part of the evidence base for the draft policy and allocations. The Note considers that the Study generally uses an appropriate methodology and a sound approach to identify areas suitable for tall buildings, bearing in mind the document only allows broad conclusions to be reached. Despite this, however, the document has inherent limitations as it fails to assess individual sites or areas in any great detail and creates limitations in setting height parameters.

The acceptability of tall buildings on individual sites will depend on the specific characteristics of the site and its context and the Urban Design Study is not intended to assess the suitability of specific proposals for individual sites. Further detailed study is necessary to make an assessment and judgments about acceptability and appropriateness. Furthermore, the 'appropriate range' identified within the Study across the various sites has equally not been tested in a site-specific way and, as a consequence, there may be flexibility for increased heights on specific sites which go beyond the identified ranges.

Therefore, given that individual sites have not been considered and there is no detailed assessment on a site-by-site basis, a degree of flexibility is necessary to avoid the broad findings of the Study being applied in an unnecessarily restrictive way. The Study provides only broad guidance on appropriate heights for tall buildings, and it would be incorrect to use this guidance on heights as inflexible maximum heights. Applying the Study in this way would result in an overly restrictive approach to height which would not accommodate the necessary flexibility in emerging proposals.

It is for this reason that the wording of Policy LP4 should be amended to enable the necessary flexibility for emerging proposals to allow detailed, site-specific analysis to demonstrate that taller buildings should be allowed where there would be no unacceptable adverse impacts, including on the character and appearance of the local area.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	To discuss the proposed amendments to the draft allocations as set out in our reps, subject to further changes made prior to the hearings.
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity</p>

	<p>for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The Council considers that the Master Brewer judicial review Case should be interpreted in those circumstances specific to the London Borough of Hillingdon. Wandsworth Council's approach to planning for tall buildings is that set out in Policy LP4 which is considered to be in general conformity with the London Plan.</p> <p>In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No changes considered necessary.
Consultee Full Name	Workspace Group
Consultee Organisation Details	Workspace Group PLC
Agent Full Name	Freddie Clarke
Agent Organisation Details	Planner Avison Young
Comment ID	667
Title	Paragraph
Number	5.79
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Battersea Design and Technology Quarter Site Allocation</p> <p>This section of the representation is made in relation to 5-7 Havelock Terrace, which is included within the draft Battersea Design and Technology Quarter (BDTQ) site allocation.</p> <p>Within the site allocation, it is noted that the site falls within tall building zone TB-B3a-01 which has a maximum appropriate height range of 7 to 13 storeys. It states the height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4.</p> <p>As above, the word 'maximum' should be removed and the paragraph should be worded as follows:</p> <p><i>'The maximum appropriate height range for the zone is 7 to 13 storeys, and the appropriate height range for the cluster must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of appropriate height range, unless it can be clearly demonstrated that this would not result in any unacceptable adverse impacts, including on the character and appearance of the local area.'</i></p>

The Urban Design Study (2021) identifies the site as being in an area of lower sensitivity, high probability for change, and higher development capacity and within Nine Elms Opportunity Area. The strategy for the B3 Nine Elms Mixed Use area is 'transform'. The existing character of the area is fragmented and incoherent, therefore the strategy is to transform the character of the place, as is already underway.

The Urban Design Study notes that the existing prevailing height within tall building zone TB-B3a-01 is 2-12 storeys, however, this does not consider recently approved developments. An application (ref. 2020/2837) at Site at Palmerston Court was approved on 8th March 2021 for the construction of 4 buildings of up to 21-storeys in height, directly to the north of 5-7 Havelock Terrace. Subsequently, construction has started on site and the consent has been implemented.

Given the lower sensitivity of the area, the high probability for change, higher development capacity and high accessibility of the site (PTAL 5), the appropriate height range for the zone should be increased to ensure that the Opportunity Area fully realises its growth and regeneration potential, in accordance with London Plan Policy SD1, and development can make the best use of land that optimises the capacity of sites, in accordance with London plan Policy D3.

Furthermore, the appropriate height range should be adjusted to consider the recently approved development at Site at Palmerston Court so that adjacent and surrounding sites can be designed to respond to and enhance the emerging character of the area. Restricting building heights to 13 storeys will result in an isolated tall building that fails to integrate successfully into the area. Therefore, greater flexibility should be provided within the appropriate building range so that proposals can respond to surrounding sites and be assessed against the relevant criteria within Draft Policy LP4 and London Plan Policy D9.

As set out within the Townscape Note within **Appendix I**, Cogent Heritage have tested the views towards Battersea Power Station in relation to 5-7 Havelock Terrace. This demonstrates that development on the site of up to 16-storeys would neither block views of Battersea Power Station,

nor be seen behind it, taking into account emerging development. The Urban Design Study sets out that existing buildings are relatively modest in scale and there is a need to ensure appropriate stepping down to these where retained. However, it is well established that such a stepping is not a necessary prerequisite for all tall buildings or all sites, and a development that does not incorporate such a stepping in height could be entirely acceptable in its own right. In any event, the Palmerston Court development immediately to the north of 5-7 Havelock Terrace was approved on 8 March 2021 (ref. 2020/2837) and comprises 4 buildings of up to 21-storeys in height. A site at the suggested maximum height of 16 storeys on the site of 5-7 Havelock Terrace would constitute a stepping down.

The Townscape Note also highlights that the Urban Design Study sets out that tall buildings will need to respond positively to the adjacent Parktown Estate Conservation Area and nearby Battersea Park Registered Park & Garden and Conservation Area. The recent permission at Palmerston Court directly to the north of the site demonstrates that it is possible for buildings up to 21-storeys and it cannot reasonably be argued that a lower development on the immediately adjoining site would cause unacceptable impacts. The 21-storey building would also restrict view of 5-7 Havelock Terrace from the north.

There is no evidence in the Urban Design Study that would support limiting the height of development on the site of 5-7 Havelock Terrace to 13-storeys instead of the suggested 16-storeys. As part of the Townscape Note, a differential Zone of Theoretical Visibility (ZTV) has been produced, shown below and within **Appendix I**. This demonstrates that a 16-storey building would have a very marginal increase in visibility from small parts of the nearby Conservation Areas, for an area of lower sensitivity, and other areas of increased visibility are of low sensitivity. Whilst there would be a degree of greater visibility over longer distances, no heritage assets, protected views or especially sensitive areas would be affected, and at such distances the development would become a more distant presence. It is also relevant that in the longer views from the south (and north), the consented Palmerston Court development would be taller and therefore break the skyline, rather than any 16-storey development on the site of 5-7 Havelock Terrace.

It has therefore been demonstrated that it would be incorrect to restrict any future proposals to a maximum height of 13-storeys, particularly following the approval of buildings up to 21-storeys on the adjacent site. The wording of the site allocation should therefore be amended to allow greater flexibility which will allow heights to be increased following in-depth, site-specific analysis.

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	
Reason why	To discuss the proposed amendments to the draft allocations as set out in our reps, subject to further changes made prior to the hearings.
Council Response	<p>Comment noted. The approach to setting height ranges is considered to be sound and in accordance with the London Plan. The supporting text of London Plan Policy D9 Tall Buildings; Paragraph 3.9.2 gives further guidance as to how Policy D9 B (2) should be interpreted which includes determining the maximum height that could be acceptable in locations for Tall Buildings.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>The UDS sets out the character of the borough which has been divided into seven 'places' and 25 character areas. Each 'place' is introduced, followed by the character area profiles for the character areas within it. The profiles begin with the key characteristics of the character area, followed by valued features and negative qualities. These aspects aim to capture the key aspects of character at a high level. This analysis, coupled with the sensitivity and change analysis, development capacity assessment and consideration of existing and consented tall buildings mapping has informed the identification of the tall and mid-rise building zones and appropriate height range. The conclusions of this work has been applied to the assessment of housing capacity within the HELAA, and it is shown to not compromise housing delivery. In all cases, the acceptability of individual plots will depend on specific characteristics of the site.</p> <p>Extant permissions have been considered within the assessment of the UDS and have been factored into the consideration of setting building height ranges as part of the design-led approach.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	Workspace Group
Consultee Organisation Details	Workspace Group PLC
Agent Full Name	Freddie Clarke
Agent Organisation Details	Planner Avison Young
Comment ID	672
Title	WT8 FERRIER STREET INDUSTRIAL ESTATE, FERRIER STREET, SW18 (1.90ha)
Number	Statement 8
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	

**Details of reason(s)
for representation**

Site Allocation WT8: Ferrier Street Industrial Estate

This section of the representation is made in relation to Morie Street Studios, SW18 1SL which is located within the Ferrier Street Industrial Estate site allocation (WT8).

In the first instance, the inclusion of the site within tall building zone TB-G1d-03 is supported by Workspace following our previous representations.

Our previous representation, included at **Appendix III**, was supported by a feasibility study prepared by Steer. The feasibility study demonstrates that a connection through the centre of the Morie Street Studios site is not feasible and would risk precluding the future redevelopment of the site.

The feasibility study provides a review of four different potential routes through the site and assesses their suitability in terms of design, viability, acoustics, light, air quality, safety, and service of desire lines.

As a result of the significant level changes between the site and Swandon Way at the centre and the north of the site, any link through the site will take up a disproportionate quantum of ground floorspace which would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site.

There is, however, potential to provide a route to the south of the site. This represents the best option when considered in the round as demonstrated by the diagram included at **Appendix IV** and for the following reasons:

- It would minimise the impacts upon the Morie Street studio site's ground floor layout by allowing one building to be provided and not splitting the site into two buildings. The route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation.
- Would be less disruptive to the building entrances and common facilities.
- Would make best use of available natural daylight compared to other options.
- The configuration of the building and the adjacent ground floor units would promote natural surveillance.
- Although the Metropolitan Police would prefer to see no new route, the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity.
- It would provide a direct and gently graded step-free route, with no ramps or stairs required in comparison to the other proposed routes.
- It could be designed to a high quality incorporating soft landscaping and street furniture.

In addition to the above, the future connection can only be successfully realised if sites, on the west and east of Swandon Way, seek to accommodate the crossing. The emerging masterplan for most of the Wandsworth Gasholder site has been published and is included at **Appendix V**. It is

evident that the design intent is for the main pedestrian connection to the site to be directed to the south-east towards York Road. This further supports that any pedestrian/cycle connection across Swandon Way should be located further to the south than would be achieved with a route through the centre of the Morie Street Studios in order to avoid a disjointed travelling experience.

It is strongly recommended that the proposed site allocation is updated to reflect this to avoid precluding the future redevelopment of the site and ensure that the site allocation is deliverable and therefore meets the relevant tests set out in the NPPF.

Revised text for the site allocation has been proposed below. Paragraph 4.73:

"Development should provide a mix of residential and intensified economic uses, including office, industrial and workspace for SME businesses, with appropriate loading yard space for the industrial uses. Food and drink businesses are appropriate to the east of the site where it adjoins Old York Road. Future provision should be made at the south-western edge to allow for a future installation of a new pedestrian/cycle connection, south of Morie Street Studios, across Swandon Way to the Gasholder site (WT4). Public realm improvements to the area around the southern entrance to Wandsworth Town station will be required."

Paragraph 4.79:

"Proposals should allow explore the feasibility for a connection across Swandon Way to the Gasholder cluster (WT4) with a new pedestrian/ cyclist crossing, south of Morie Street Studios, that would provide a direct and safe connection to Old York Road and Wandsworth Town Station. Careful design of proposals adjacent to Swandon Way will be required to accommodate this street level pedestrian connection towards the Gasholder cluster., potentially arranged as an archway to maximise workspace accommodation and act as a natural buffer to vehicle noise from Swandon Way."

Furthermore, the Urban Design Study sets the appropriate height range of 7-15 storeys for tall building zone TB-G1d-03. The heights 'heat map' shows taller elements to the north east of the Morie Street Studios and closer to the Old York Road Conservation Area than the Morie Street Studios site, even though the Study states that development closest to Swandon Way must respect the small scale character of Old York Road Conservation Area. The Townscape Note included within **Appendix I**, prepared by Cogent Heritage, states, therefore, that it is wholly illogical to require a step down in heights on the Morie Street Studio site because of the proximity to the Old York Road Conservation Area.

The Study seeks to locate taller buildings closest to the elevated railway line and the Wandsworth gyratory on Swandon Way. The Morie Street Studios site is located immediately adjacent to both the railway line and the Wandsworth gyratory and so it therefore can accommodate greater height.

The Study states that additional height beyond 15-storeys would risk adverse effects on the character or the nearby Conservation Areas, the River Thames character and sensitive features. This identifies a potential risk, but it should not exclude the potential for buildings taller than 15- storeys being acceptable. The acceptability of such height would of course need to be tested on a site-specific basis and justified if brought forward and there are no issues with the Study cautioning against greater heights. However, there is an issue when the cautious, risk-averse

approach in the Urban Design Study is then directly translated into fixed parameters in the draft Local Plan, without any flexibility.

A differential ZTV has been produced, as included below and within the Townscape Note, which shows to what degree there would be in seeing the heights of an 11-storey building and a 14- storey building on the site. The differential ZTV shows quite clearly that the sensitive townscape areas, especially the conservation areas and listed buildings, would not experience any notable differential visibility when the different heights are compared. The differential ZTV also shows that no identified local views (in either the Local Views SPD or the Urban Design Study) would be affected.

It is also worth noting that the ZTV does not show any development on the remainder of the draft allocation or adjacent draft allocation sites. Of particular relevance is the increased visibility that can be seen at the south east of the ZTV which needs to be placed in the context of the tallest development on the draft allocation being located to the north east and north west of the Morie Street Studios, and taller buildings on both of these sites would have greater visibility in the same locations, which means there would not be a perceived increase in the visibility of tall buildings in the distance from here due to a height increase on the Morie Street Studios site. Such a perceived increase on visibility of tall buildings in the distance from this area is implicit in the draft allocation.

In conclusion, the Morie Street Studios site lies in exactly the right location for height as identified in the Urban Design Study (i.e. adjacent to the railway line and the Wandsworth gyratory). there are no indications of unacceptable townscape or heritage impacts that would arise from increasing capacity for up to 14 storeys on the Morie Street Studios site, or alternatively to reword the policy requirements to provide flexibility in heights, subject to demonstrating that would not give rise to any unacceptable impacts.

**Change(s)
considered
necessary**

**Wishes to attend
Hearing Session**

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

Reason why

To discuss the proposed amendments to the draft allocations as set out in our reps, subject to further changes made prior to the hearings.

Council Response	<p>Comments noted. The existing wording is considered sufficiently flexible and in keeping with the aims of the Wandle Delta Masterplan SPD, however, to ensure there is complete clarity as to what should come forward additional wording could be added to the site allocation.</p> <p>The tall building maps included at Appendix 2 to the Plan identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. Darker colours indicate where there is greater potential for height and the light colours indicate less potential for height. The Urban Design Study 2021 sets out the methodology used to define such potential. The identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the relevant tall buildings map unless it can be clearly demonstrated that this would not be required having had regard to the local context. It would be up to applicant to justify an alternative approach to the principle of the location of taller elements of a scheme compared to that of the shading as set out within the tall building zones. Paragraph 14.31 sets this out clearly.</p>
Proposed Change	<p>Amend wording to paragraph 4.79 Movement as follows:</p> <p>4.79 Movement - Proposals should allow for a connection <i>to a proposed new pedestrian/ cyclist crossing, across Swandon Way to the Gasholder cluster (WT4).</i>across Swandon Way to the Gasholder cluster (WT4) with a new pedestrian/ cyclist crossing that <i>This connection should be either through or to the south of Morie Street Studios and,</i> would provide a direct and safe connection to Old York Road and Wandsworth Town Station.</p>
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	673
Title	WT2 Ram Brewery/Capital Studios/Former Dexion/Duval site, Ram Street/Armoury Way, Wandsworth, SW18
Number	Statement 2
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	We support the intentions in site allocations WT2, WT3, WT4, WT5, WT6 and WT7 for the Wandle, improvements to the river channel and new access to, along and across it. Site allocation WT10 should prioritise strengthening the relationship of the Switch House to the Wandle's historic and wildlife value. We warmly welcome the expectation set in site allocation WT9 for extension of the Wandle Trail to the confluence with the Thames and for this to incorporate a "generous open space". We also welcome the expectation of creating new public routes to the high level bridge for the riverside walk (also included in site allocation WT11). The Plan repeats the previously highlighted error in paragraph 4.94 of locating this to the west and not the east of the Wandle. The provisions for extending the Wandle Trail and providing a public route to the high level bridge should not be mutually dependent and be capable of being advanced independently of each other. We support the expectation of significant tree planting along Swandon Way in site allocations WT12 and WT13.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	<p>Comment noted.</p> <p>Site allocation WT10 is considered to be sufficiently robust and when read as part of the entire Local Plan presents a strong relationship between the Wandle's historic and wildlife value.</p> <p>It is considered that the identified typographical error in paragraph 4.94 could be amended.</p>
Proposed Change	<p>Amend the wording in paragraph 4.94 bullet point 2 as follows:</p> <p>'New development on WT9 should be designed to facilitate a safe and secure connection to the high-level bridge taking the riverside walk across the refuse transfer station site to the <u>westeast</u> of the Wandle.'</p>

Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum
Agent Full Name	
Agent Organisation Details	
Comment ID	675
Title	PM2 Wandsworth Town
Number	Policy 3
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Although physically located in Hammersmith and Fulham the Wandle Vista of the Wandle Delta should be recognised in the Area Strategy. The Vista is not addressed in paragraph 4.14 or in Policy PM2 which is limited to views in Wandsworth's Urban Design Study (2020) (PM2 A 6.) or Policy PM9 relating to Wandsworth's Riverside. Nor is it included in Map 4.1 of Wandsworth Town or Map 11.1 of Wandsworth's Riverside although this does include a similar vista looking south across Wandsworth Bridge. There is a strong evidence base supporting identification of this Wandle Vista from the Wandle Vistas report prepared for Wandle Valley Regional Park Trust and Wandle Valley Forum with funding from the Living Wandle Landscape Partnership. This work has been recognised with the RTP1's Excellence in Plan Making Practice award and the Landscape Institute's Award for Landscape Policy and Research.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. This view from Hammersmith and Fulham contains site allocations on the Wandsworth side of the river which have development potential as part of the Wandle Delta Masterplan. It is therefore considered that it is not appropriate to designate an area viewed from another borough which could jeopardise such much needed development within the Wandle Delta Masterplan area.
Proposed Change	No change considered necessary.
Consultee Full Name	Tony Burton
Consultee Organisation Details	Wandle Valley Forum

Agent Full Name	
Agent Organisation Details	
Comment ID	676
Title	LP63 Neighbourhood Planning
Number	Policy 74
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Positively prepared Justified Effective
Soundness - Complies with Duty to Co-operate?	No
Details of reason(s) for representation	Neighbourhood plans 18. Fewer than one third of the Plan's policies are defined as " <i>strategic</i> " demonstrating the considerable scope for detailed planning policies to be more community-led and delivered through neighbourhood plans. We are supportive of efforts to strengthen neighbourhood planning in the Wandle Valley, drawing on the early experience in Tooting Bec and Broadway and further upstream in Hackbridge and Beddington Corner which has a completed neighbourhood plan. This will require stronger support from Wandsworth Council to be realised. 19. We look forward to being kept involved in the Plan's progress.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd

Comment ID	678
Title	WT11 Western Riverside Waste Transfer Station, SW18
Number	Statement 11
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Design Requirements - Tall Buildings.</i></p> <p>We are pleased to see that the site allocations for both Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) have been amended to enable the delivery of buildings up to 15 storeys in height. This key change will increase the numbers of new jobs, homes and waste capacity within the Borough.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changes required.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	679
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Dear Sirs,</p> <p>London Borough of Wandsworth Local Plan – Representations by Cory Group (Cory) Full Review - Publication Regulation 19 Consultation Version (February 2022)</p> <p>We write to make representations to the London Borough of Wandsworth Local Plan Publication Regulation 19 Consultation Version. These comments seek to build on our previous representations on the Regulation 18 Consultation in February 2021. This submission provides:</p> <p>Information relating to Cory, including our operations in Wandsworth and decarbonisation objectives Representations relating to the following Local Plan policies:</p> <ul style="list-style-type: none"> - Policy LP13 Waste Capacity and Site Allocation: WT11 Western Riverside Waste Transfer Station, SW18 - Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) - Policy LP40 Protected Wharves - Policy SS1 Spatial Development Strategy and Site Allocation: Kirtling Street Cluster - Policy LP13 Circular Economy, Recycling and Waste Management <p><i>Background to Cory</i></p> <p>As discussed in the previous representations Cory Group (Cory) operates two facilities in the London Borough of Wandsworth on behalf of Western Riverside Waste Authority (WRWA):</p> <p>Western Riverside Waste Transfer Station, Materials Recycling Facility, Household Waste and Recycling Centre in Wandsworth</p> <p>Cringle Dock Waste Transfer station in Battersea</p> <p>Both facilities include and rely on designated safeguarded wharves and play a crucial role in ensuring that London's recyclable and non-recyclable waste is transported sustainably via the river Thames.</p> <p>Cory has accelerated its decarbonisation strategy despite the challenges posed by Covid-19, with meaningful delivery across a range of areas. The waste industry plays a critical role in shaping a better future for our communities and the environment, and alongside this Cory is committed to making a material contribution to</p> <p>the UK's decarbonisation objectives.</p> <p>Given the urgency required to address the climate crisis, Cory has committed to achieving net zero carbon emissions by 2040. We are currently:</p>

	<p>Increasing our carbon benefit to society by helping to develop one of UK's largest district heat networks with Vattenfall</p> <p>Reducing energy consumption across our sites</p> <p>Running our tug fleet on biofuel, reducing their net carbon emissions by 90%</p> <p>Undertaking research and development with BAE Systems into zero-carbon river transportation</p> <p>Advancing the world's largest waste sector carbon capture project. By 2030, this could prevent 1.4 million tonnes of CO2 emissions per annum – providing a significant contribution to reducing the carbon emissions of the several million people Cory services in London and the South East.</p> <p>Delivering in these areas will support sustainable growth and make a real difference to how we operate as a business.</p> <p>Associated to this approach we are constantly striving to improve the operational and environmental performance of our existing facilities in Wandsworth and are actively considering a range of renewal, upgrade and redevelopment options at both locations. With this in mind, we set out our representations to the Consultation Document with safeguarded wharves and future mixed use development opportunities continuing to be at the forefront of these representations.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted.
Proposed Change	No change considered necessary.

Consultee Full Name	London Square
Consultee Organisation Details	
Agent Full Name	Anna Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	680
Title	Wandsworth Regulation 19 Local Plan
Number	
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LONDON BOROUGH OF WANDSWORTH: LOCAL PLAN FULL REVIEW (JANUARY 2021) PUBLICATION VERSION LOCAL PLAN – REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGS 2012</p> <p>We write on behalf of our client, London Square, in response to the London Borough of Wandsworth's consultation on the proposed Wandsworth Publication Version Draft Local Plan.</p> <p>These representations set out comments on the Publication Draft Local Plan, dated January 2021. Specifically in this letter we comment on the following matters in relation to the Local Plan:</p> <ul style="list-style-type: none"> Springfield Hospital Draft Allocation; Designation of Metropolitan Open Land; Design-led approach; Delivery of Residential accommodation; Affordable Housing; and Energy and Sustainability. <p><u>Background</u></p>

Before setting out our comments on the above matters, we set out a brief overview of Springfield Hospital and London Squares interest in the Site.

South West London and St Georges Mental Health NHS Trust (SWLSTG) “the Trust” provides local mental health services to approximately 1.2 million people in South West London. The Trust have embarked on a much needed programme for the modernisation of mental health facilities serving south west London which includes the comprehensive redevelopment of the Springfield Hospital Site which falls within the administrative area of the LB Wandsworth.

In 2012 the Secretary of State granted planning permission and listed building consent for the comprehensive development of Springfield Hospital, which once completed, will provide a new state-of-the art mental health hospital alongside new homes, a new care home, school and a major new public park.

Following the ‘original’ permission a number of amendments have been made which have enabled the scheme to be brought forward.

The site benefits from allocation 89 within Wandsworth’s Local Plan Site Specific Allocations Document March 2016. In September 2017 the South West London and St George’s Mental Health NHS Trust selected its preferred developer, STEP, and works in relation to the new hospital facility and infrastructure began in early 2019. STEP were further officially appointed in December 2019 as Master Developer for the Site. The following phases of the Springfield Hospital development have or are in the process of being brought forward:

- Phase 1 – 26 dwellings (brought forward by Bellway– completed);
- Phase 2 – Park and Infrastructure (Implemented by STEP);
- Phase 3 – Hospital (Implemented by STEP);
- Phase 4 – Care Home (brought forward by STEP);
- Phase 5a – 227 dwellings (Implemented by Barratt);
- Phase 5b – 71 dwellings (Implemented by Barratt);
- Phase 6a – 72 conversion dwellings (Implemented by City and Country);
- Phase 6b – Reserved Matters and Listed Building consent for 110 units (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country);
- Phase 6c – Reserved Matters and Listed Building consent for 80 units (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country);
- Phase 6c – Full Application for the erection of 32 residential units (to be brought forward; and
- Phase 6d – Reserved Matters consent for the conversion of Glenburnie Lodge (Reserved Matters and Listed Building Consent approved and to be brought forward by City and Country).

London Square are the preferred bidder for the delivery of residential parcels P,Q, G, Eu2 and F of the approved Springfield masterplan and are currently proceeding forward with preparing Reserved Matter applications in relation to these parcels.

National Planning Policy Context

In preparing these representations significant weight has been given to national planning policy set by the National Planning Policy Framework (NPPF) (July 2021).

Paragraph 9 of the 2021 NPPF requires sustainable development objectives to be delivered through the preparation and implementation of plans. Paragraph 11 of the NPPF requires that during the plan-making process, plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. Part b of paragraph 11 requires that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.

Section 3 of the NPPF deals with plan-making specifically and identifies under Paragraph 16 that the planning system should be genuinely plan-led. Paragraph 16 requires plans to achieve the following:

- 1 a) be prepared with the objective of contributing to the achievement of sustainable development;
- 2 b) be prepared positively, in a way that is aspirational but deliverable;
- 3 c) be shaped by early, proportionate and effective, engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- 4 d) contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals;
- 5 e) be accessible through the use of digital tools to assist public involvement and policy presentation; and f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

With regard to Strategic Policies, Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment.

Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). This reflects Paragraph 15 of the NPPF which states that a framework for addressing housing needs should be provided through a genuinely plan-led system.

Turning to producing new Local Plans specifically, Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Local Plans should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirement (Paragraph 32).

The London Plan

Consideration has also been given in the preparation of these representations to the London Plan. The London Plan was adopted in March 2021 and places emphasis on the need to build strong and inclusive communities (Policy GG1), making the best use of land (Policy GG2), creating a healthy city (Policy GG3), delivering the homes Londoners need (Policy GG4) and growing a good economy (Policy GG5).

Closing

We trust that these observations are useful at this consultation stage. We wish to maintain an active role in the engagement process moving forward and look forward to receiving an update as LBW proceed through to publishing their new Local Plan.

Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comments noted.

	<p>These comments both provide an overview and summarise the more detailed responses from the responder to policies within the plan.</p> <p>The Plan is considered to be sound and in accordance with the NPPF and the London Plan and based on a robust evidence base. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.</p>
Proposed Change	No change considered necessary.
Consultee Full Name	London Square
Consultee Organisation Details	
Agent Full Name	Anna Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	681
Title	OUT3 Springfield Hospital, Burntwood Lane / Glenburnie Road, SW17
Number	Statement 70
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Publication Version Draft Local Plan - January 2022</p> <p>The following sections respond to specific policies outlined within the London Borough of Wandsworth (LBW) draft Publication Version Local Plan.</p> <p><i>Springfield Hospital Allocation</i></p> <p>It is acknowledged that the Site has been reallocated under the Publication Version of the Local Plan following representations made during the Regulation 18 stage of the Local Plan by South West London and St Georges Mental Health NHS Trust (SWLSTG). The proposed draft allocation OUT 3 (Springfield Hospital, Burntwood Lane/Glenburnie Road, SW17) identifies the Site for new and improved hospital facilities, residential and small scale commercial / retail uses serving the hospital, residential and school facilities. The draft allocation also requires the retention of the Open Space for use as a public park with recreational use and the retention of the locally listed chapel for community facilities.</p> <p>The draft allocation provides prescriptive requirements for how the layout of the Site is to be brought forward. The draft allocation requires the delivery of small urban blocks to create a distinctive neighbourhood. In line with Policy GG2 (Making the best use of land) of the London Plan, the most efficient use of the Site is required to be achieved. As such it is not considered</p>

	<p>appropriate therefore to attribute a development type, such as small urban blocks, within the allocation as any development brought forward on the Site of an appropriate density, scale and massing should be tested through a design- led approach.</p> <p>As set out above London Square's interest falls within residential parcels P, Q, G, EU2 and F of the wider Springfield masterplan. London Square are proceeding forward with a Reserved Matters application which aligns with the parameters approved as part of the outline. However, in line with national, regional and local planning policy the proposals are seeking to optimise the delivery of residential across the parcels and therefore the site allocation policy should reflect this.</p> <p>In summary, the re-introduction of the allocation is welcomed however the prescriptive condition around the delivery of small urban blocks attached to the allocation is likely to prohibit the optimisation of the whole masterplan. In order therefore for Policy GG2 of the London Plan to be achieved the proposed restrictive condition regarding the layout should be removed from the allocation and be design led.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comments noted. The reference to small urban blocks' reflects the approved masterplan for the site which uses this form of development to create a neighbourhood around the dominant listed buildings.
Proposed Change	No change considered necessary.
Consultee Full Name	London Square
Consultee Organisation Details	
Agent Full Name	Anna Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	682
Title	LP53 Protection and Enhancement of Green and Blue Infrastructure
Number	Policy 64
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Designation of MOL Land</i>

Under the emerging Local Plan, part of the wider Springfield Hospital site continues to be designated as Metropolitan Open Land (MOL). Draft Policy LP53 (Protection and Enhancement of Green and Blue Infrastructure) of the emerging Local Plan states that areas identified as MOL will be protected, enhanced and made more accessible.

Chapter 13 of the NPPF concerns the protection of Green Belt Land, which is applied equally to MOL. Paragraph 138 identifies that the Green Belt serves the following five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Policy G3 (Metropolitan Open Land) of the London Plan states that MOL should be afforded the same protection as Green Belt and requires land designated as MOL to meet one of the following criteria:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

The policy goes on to note that alterations to the boundary of MOL should be undertaken through the Local Plan process. Any alterations to the boundary should only be considered in exceptional circumstances when this is fully evidenced and justified, considering the purposes of including land in the MOL as set out above.

As set out above, the wider Springfield Site benefits from outline permission which approved the comprehensive redevelopment of Springfield Hospital in 2012 and had been lawfully implemented. The wider outline includes the provision of a publically accessible park within the MOL which in line with London Plan Policy G3 will contribute to the physical structure of London and contain leisure and culture activities.

It is noted that residential parcels P, Q, part of G, X, Y and Z are currently designated within the MOL, albeit only parcels P, Q, part of G fall within London Squares interest and therefore only these parcels are discussed within these representations.

Under the outline the approved parameter plans (as amended) the residential accommodation within the land currently designated within MOL is upto 11.5m above external ground level, with associated landscaping, access and car parking.

The emerging Local Plan and its subsequent designation has not been revised to reflect the development which has been permitted on the existing designated MOL under the 2021 outline planning and for which the detailed design is currently being progressed with. It is considered that the part of the MOL which falls within parcels P, Q, part of G, no longer achieves the functions / purposes as set out within the NPPF and the London Plan.

It is therefore considered in line with Policy G3 (Metropolitan Open Land) of the London Plan the current Local Plan review process provides an appropriate opportunity to refine the MOL boundary on the Site to exclude residential parcels P, Q and Part of G from the MOL allocation.

**Change(s)
considered
necessary**

Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	The Local Plan has not conducted a MOL Review and therefore no changes to it will come forward at this time.
Proposed Change	No change considered necessary
Consultee Full Name	London Square
Consultee Organisation Details	
Agent Full Name	Anna Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	683
Title	LP1 The Design-led Approach
Number	Policy 12
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Design-Led Approach</i> Draft Policy LP1 (The Design-led Approach) requires development proposals to reflect and demonstrate that a design led approach has been adopted to optimise the potential of sites is welcomed to ensure that the delivery of residential accommodation is optimised on brownfield sites. The requirement to ensure the most efficient use of land is achieved and Site optimisation accords with the NPPF and Policy GG2 (Making best use of Land) of the London Plan.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.

Consultee Full Name	London Square
Consultee Organisation Details	
Agent Full Name	Anna Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	684
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Delivery of Residential Accommodation</i></p> <p>Draft Strategic Policy SDS1 (Spatial Development Strategy 2023-2038) of the emerging Local Plan states that over the plan period of 2023-2038 the Local Plan will provide for a minimum of 20,311 new homes. The provision of 'minimum' in the draft strategic policy is welcomed as it should be reminded that housing targets set are minimum targets and should not be considered maximums. Within the Tooting area, of which the Springfield Hospital Site is located within, the capacity for new homes has been identified as 206 during the plan period.</p> <p>Part C of the draft Policy sets out how the identified target will be achieved which includes making the best use of land whilst ensuring that development densities are appropriate to the location and size of the site. The encouragement of ensuring the best use of land to deliver much needed residential accommodation is welcomed. It should also be noted that this aligns with both London Plan Policy GG2 and the NPPF which places emphasis on optimisation of sites including brownfield land to deliver residential accommodation. The Springfield Hospital Site presents an opportunity to ensure the most efficient use of this brownfield Site is achieved which would contribute to ensuring that the LBW can achieve their minimum housing targets set out above.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	London Square

Consultee Organisation Details	
Agent Full Name	Anna Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	685
Title	LP23 Affordable Housing
Number	Policy 34
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Affordable Housing</i> Draft Policy LP23 (Affordable Housing) seeks to maximise the delivery of affordable housing in accordance with the London Plan. Part E of the draft Plan states that ' <i>site-specific viability information will only be accepted in exceptional cases, as set out in Policy H5 of the London Plan</i> '. Part F of London Plan Policy H5 (Threshold Approach to Applications) states that where an application does not meet the criteria set out in Policy H5 it must follow the Viability Tested Route, which requires detailed supporting viability evidence to be submitted. Policy H5 of the London Plan does not make any reference to or provide clarification on 'exceptional' circumstances where viability testing would be allowed. In line with the London Plan, proposals which do not meet policy compliant thresholds should be subject to viability.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Comment noted. The wording refers to Criterion F of Policy H5, which sets out the circumstances under which viability information will be required. This is effectively 'exceptional' to meeting the threshold approach.
Proposed Change	No changes considered necessary.
Consultee Full Name	London Square
Consultee Organisation Details	
Agent Full Name	Anna

	Russell-Smith
Agent Organisation Details	Senior Planner Montagu Evans
Comment ID	686
Title	LP10 Responding to the Climate Crisis
Number	Policy 21
Soundness - Legally Compliant?	
Soundness - Sound?	No
If not, why?	Consistent with national policy
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Energy and Sustainability</i> It is noted, under draft Policy LP10 (Responding to the Climate Crisis), development proposals will be required to achieve net zero carbon standards in line with the London Plan with a minimum onsite reduction of 35%. A consistent approach with the London Plan is welcomed. Whilst the encouragement of high quality sustainable buildings is welcomed, the provision of <i>unless it can be demonstrated that this would not be technically or viability feasible</i> is further welcomed. Developers should seek to deliver the most sustainable development possible whilst balancing other social, environmental and economic benefits.
Change(s) considered necessary	
Wishes to attend Hearing Session	Yes, I wish to participate in hearing session(s)
Reason why	
Council Response	Support noted.
Proposed Change	No change required.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	687
Title	LP13 Circular Economy, Recycling and Waste Management

Number	Policy 24
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP13 Waste Capacity and Site Allocation: WT11 Western Riverside Waste Transfer Station, SW18</i></p> <p>Policy LP13 seeks to safeguard existing waste sites and identify new waste facilities in LB Wandsworth which contribute to London's recycling and waste capacity. The importance of this and the role of waste management within Local Plan Policy is heavily supported by Cory.</p> <p>We strongly support LP13 which contemplates the consolidation of existing waste sites within the Borough and the role this could play in meeting future waste management strategies.</p> <p>We note that through Part F of the Policy the Council is actively seeking to increase waste capacity overall at new sites, existing facilities, safeguarded wharves, and SIL and LSIAs. We support the objective set out in Consultation Statement Appendix 5 that states <i>"Wandsworth is planning to close the capacity gap by identifying suitable areas and waste management facilities to provide the capacity to manage the apportioned tonnages of waste by 2026"</i>. However, we also note that the appendix also confirms that <i>"In Wandsworth, as in most other waste planning authority areas, no individual waste sites were put forward by operators during the plan-making process"</i> (in response to a call for sites). Nor are there any new waste sites situated on the river coming forward in London. Using the river for bulk haulage purposes makes an essential contribution to improving road safety and air quality.</p> <p>From our perspective as a strategic waste operator within Wandsworth and wider London, it is also important that the Local Plan (and evidence base) explicitly recognises the challenges that will arise because of new and emerging legislation. For example, we do not consider that the Council have given appropriate consideration to the Environment Act 2021. The Act has placed new duties on waste collection authorities to collect additional recyclable materials, most notably food waste. The waste management facilities operated by Cory in the Borough may need to be adapted and expanded to meet future requirements.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Support welcomed.</p> <p>The requirements of the Environment Act 2021 referred to is the proposed introduction of consistent recycling collections, including weekly collections of food waste. However, the full implications of the Environment Act 2021 on waste authorities have yet to be established through secondary legislation. Therefore the Local Plan, and supporting waste evidence base, cannot provide further analysis at this time. In planning terms, "identified need" for Local Authority Collected Waste (LACW), for which the WRWA is the statutory disposal authority, is provided by the London Plan apportionment targets. It is the responsibility of Wandsworth, in its capacity as a waste planning authority, to identify sites and areas to meet the apportionment targets in its Local Plan. However, it is under its responsibilities as a waste disposal authority that Wandsworth, working in partnership with the WRWA and the other Western Riverside boroughs, is required to plan for the management of LACW generated in the area through a joint waste strategy. The Local Plan can and should reflect the WRWA's waste management strategy, for example by safeguarding existing sites or by allocating sites for new waste facilities where these are known. However, the WRWA does not have an up to date waste management strategy. The WRWA, in partnership with the Western Riverside Boroughs, will no doubt be in a position to prepare a new waste management strategy once the consequences of the Environment Act 2021 are known. This will include analysis of the ability of existing facilities to meet any new requirements.</p>

Proposed Change

No change considered necessary.

Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	688
Title	WT11 Western Riverside Waste Transfer Station, SW18
Number	Statement 11
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>In seeking to assist in meeting the capacity gap we would like to put forward the potential combined redevelopment of the Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) as a development opportunity which can deliver additional waste capacity.</p> <p>The Western Riverside Waste Transfer Station, identified as site allocation WT11 in the draft plan, as well as the Household Waste and Recycling Centre (HWRC), both lie adjacent to the east boundary of the Feather's Wharf site. While the Feathers Wharf Cluster has been allocated for mixed use development, we consider that there is a strong case for combining this site allocation with the adjacent (WT11) allocation.</p> <p>This approach would enable the comprehensive redevelopment of the site enabling the Council's ambitions for residential, commercial, and other key uses to be delivered alongside an increase in waste capacity, thus contributing to closing the demonstrable capacity gap. The comprehensive nature of the scheme will not jeopardise any key goals of the Local Plan and will instead create a coherent spatial planning framework that ensures that essential uses can co-exist alongside each other.</p> <p>We strongly recommend that the draft allocations are reviewed considering the above and amended to ensure that the combined goals of the site allocations can be delivered. This approach has substantial benefits for Wandsworth in delivering new homes, new jobs, and an uplift of waste capacity and will therefore be compatible with the overarching objectives of the Local Plan.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The existing cluster sets out that the main principles of development are focussed around mixed use development, opening up of the River Wandle for its amenity use and providing new public open space. Including the WRWA site allocation (WT11) in the cluster is considered not to be coherent to this approach. Also, any potential redevelopment

	opportunity is still uncertain at this stage. However, it is considered that the proposed approach would not prevent a comprehensive redevelopment of WT11 Western Riverside Waste Transfer Station and the Feather's Wharf Cluster if that opportunity were to arise in accordance with the site allocations.
Proposed Change	No change considered necessary.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	689
Title	WT9 Feathers Wharf, The Causeway, SW18
Number	Statement 9
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<i>Design Requirements - Tall Buildings.</i> We are pleased to see that the site allocations for both Feather's Wharf Cluster; Site Allocation WT9 (Feather's Wharf); and Site Allocation WT11 (Western Riverside Waste Transfer Station, SW12) have been amended to enable the delivery of buildings up to 15 storeys in height. This key change will increase the numbers of new jobs, homes and waste capacity within the Borough.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	

Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	690
Title	LP40 Safeguarding Wharves
Number	Policy 51
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP40 Protected Wharves</i></p> <p>We support the recognition within the Local Plan that there is the potential for consolidation of safeguarded wharves as identified within London Plan Policy SI15 and to ensure consistency between that policy and LP40. Again, it is critically important that sites are available to support bulk haulage on the river Thames given its role in improving air quality and road safety.</p> <p>We also welcome the recognition that intensification and upgrade of the sites including amendments to access arrangements is supported where the operational capacity of the facility is not reduced. Associated to this we strongly support the delivery of mixed-use development on wharf sites provided that the long-term water freight use of the site is secured, and the operational capacity is either improved or retained.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No changed required.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd

Comment ID	691
Title	Kirtling Street Cluster
Number	Map 5.5
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy SS1 Spatial Development Strategy and Site Allocation: Kirtling Street Cluster</i></p> <p>We support appropriately sited and designed development and the overall objectives of the Nine Elms Masterplan area, including the Kirtling Street Cluster.</p> <p>The New London Plan sets out that new development should, through the Agent of Change Principle, respect key existing uses and infrastructure and not seek to introduce incompatible uses (through location or design). This is an approach we support and are pleased to see is identified in the Local Plan.</p> <p>To meet future waste management requirements at Cringle Dock and to complement our commitment to sustainability, we have been exploring redevelopment options across our portfolio.</p> <p>The Local Plan review presents an exciting opportunity to establish a clear planning and spatial framework for the Kirtling Street Cluster.</p> <p><i>The Challenges and Opportunities</i></p> <p>The Cringle Dock WTS facility is situated on the site of a Safeguarded Wharf and was originally built in the 1970s as a riparian waste transfer station that pulverised waste before sending it to landfill. In the 1990s it was modified to containerise waste for onward transportation initially to landfill but from 2011 via the river to the Cory owned Riverside Resource Recovery Energy from Waste Facility in Bexley.</p> <p>In the intervening period, Battersea Power Station, supported by Wandsworth Council and Transport for London, have significantly transformed, improved access to and ultimately revitalised the local area, and in doing so secured a future for one of London's most recognisable and important cultural heritage assets.</p> <p>This presents a challenge and an opportunity which we are seeking to build on. The overarching planning permission (and Section 106 legal agreement) for Battersea Power Station's masterplan recognised that Cringle Dock WTS:</p>

performs, and will continue to perform in perpetuity, an essential public service (supporting the needs of nearly 1 million people, across four London Boroughs) and enables WRWA to perform its statutory functions;

has exceeded its intended design life and requires a substantial programme of redevelopment;

has a demonstrable and immovable requirement to be situated on the river and that there are no other suitable sites in Wandsworth capable of meeting this need; and

It would be difficult, if not impossible, to bring forward Phase 6 of the Battersea Power Station masterplan programme, which envisages over 1 million square feet of mixed use development, without the comprehensive, and sympathetic redevelopment of Cringle Dock.

Over a long period of time, WRWA, Battersea Power Station and Cory have engaged positively and extensively to address the challenges presented above. In 2016, the parties secured planning permission for the comprehensive redevelopment of Cringle Dock. The consented scheme comprised a major residential-led collocation scheme that included 422 new homes and mixed use development on top of a modern WTS, served by a refurbished dock.

Whilst innovative in certain respects, the consented scheme did not materialise for four key reasons:

- 1 The transitional arrangements needed to maintain service continuity during the construction period (including development of a temporary WTS) were found to be unworkable, and would have led to significant service disruption, expense and adverse impacts on local amenity (largely due to the need to divert substantial tonnes of waste by road to a transitional facility unconnected to the river);
- 1 The construction of a substantial residential scheme above a modern waste transfer station would be abnormally expensive, due in part to the need for complex civil and structural engineering and suboptimal or novel access, fire safety and amenity protection measures;
- 1 Preliminary market research by the parties indicated that there would be little appetite for market housing with suboptimal access arrangements and situated above an operating waste transfer station. Sharing a single building envelope in this way would potentially lead to more negative residents- operator interactions, and ultimately more amenity-related complaints. Without a clear route to market, the scheme would be unworkable and therefore undeliverable; and
- 1 Similarly, with increasing concerns relating to fire safety, the parties realised that funding and insurance options for prospective purchasers would be extremely limited, or unavailable.

It should be noted that the Section 106 legal agreement referenced above requires significant interventions to be installed within Cringle Dock and Kirtling Wharf prior to development zone RS2 (Phase 6) being delivered. The previous application at Cringle Dock sought to deliver these and it is simply not viable to do so in isolation on the site. These key issues could not be overcome on the isolated site and thus we sought to explore additional opportunities presented by the potential availability of surrounding land. Of note is the potential to amalgamate Cringle Dock and Kirtling Wharf.

The Solution

Kirtling Wharf, also on a Safeguarded Wharf site, is situated immediately to the east of the Cringle Dock WTS, on the northern side of Cringle Street at the junction with Kirtling Street. The site includes a permanent quay accessed by a jetty and was historically used for concrete batching.

In 2012-2013 Thames Tideway (TT) acquired Kirtling Wharf (and several adjoining sites) and secured development consent for another critical infrastructure project of essential benefit to London, the Thames Tideway Tunnel (TTT). The Development Consent Order (DCO) permitted the applicant to undertake certain works, including to establish a main tunnel drive site for use in constructing, connecting and operating the main sewer tunnel. DCO Requirements KRTST4 and KRTST23 set out the measures required to restore the site following the

completion of the works to ensure that its permanent works maintain the viability of Kirtling Wharf for waterborne freight handling purposes. Following the anticipated completion of TTT related works in 2023, it is envisaged that the site will then revert to its long-term freight handling role as intended.

For the reasons expressed earlier, Cringle Dock WTS cannot be viably redeveloped on the existing site. However, following feasibility work undertaken by a multidisciplinary engineering, design, economics and planning team (Wood, Rolfe Judd and Carter Jonas), WRWA and Cory have concluded that the imminent completion of TTT's Kirtling Wharf works, site restoration and market disposal represents a once in a generation opportunity to both replace critical WTS infrastructure (whilst maintaining service continuity) and produce conditions that would support the completion of the Battersea Power Station Masterplan (Phases 5, 6 and 7). In addition, the site vacated by the existing WTS could be brought forward for a major mixed used development, new public realm and access improvements.

The Outcome

By securing a favourable Local Plan allocation, the subsequent amalgamation of the two adjoining estates and relocation of the WTS, would not only unlock the final Battersea Masterplan phases, it would also realise several other important socio-economic objectives; namely:

Secure the future viability of both of the statutory protected Safeguarded Wharves at Cringle Dock and Kirtling Wharf, supporting the Mayor's transport and air quality strategies (requiring modal shift to the River Thames to reduce congestion, improve air quality and safety);

Synergies secured by aggregating the estates will improve access arrangements, layout and building design quality and efficiencies, thereby producing viable operational areas for both waste management and logistics, and in doing so demonstrably reduce the Borough's overall waste management and logistics capacity deficiencies;

Ensure that the WTS continues to comply with the Environmental Permitting (England and Wales) Regulations (including meeting stringent Fire Protection Plan obligations), and is better equipped to comply with the Environment Act 2021 (including emerging regulations requiring the separate management of food, green waste, packaging and recycling);

Satisfy TTT's ongoing tunnel maintenance and emergency access safeguarding requirements at Kirtling Wharf;

- Contribute materially to meeting housing delivery targets in Wandsworth and London as a whole with circa 400 new homes; and
- Support the intensification of industrial, logistics and commercial uses in Wandsworth and London with circa 1,200 – 1,500 new jobs delivered.

To support the above aspirations, we have developed a Cringle Dock and Kirtling Wharf Masterplan Vision. This vision has been split into key zones detailed below and is supported by a Land Use Masterplan for the Kirtling Wharf Site which demonstrates the key benefits the approach can realise for the Council and the wider area. The Masterplan is appended to this representation.

The Waste Management, Logistics and Tideway Tunnel Zones

By 2026, the Cringle Dock and Kirtling Wharf masterplan area will have been comprehensively redeveloped and will accommodate a sympathetically designed, modern waste transfer station (WTS) capable of safely and efficiently meeting the statutory customer service obligations of WRWA.

Served by the river Thames with an upgraded internal dock, the fully enclosed WTS will be an exemplar facility, benefitting from off-street vehicle processing and holding areas, advanced waste handling and logistics infrastructure, and state of the art security, surveillance and control systems to manage emissions, energy and water consumption, ventilation, safety, pollution and fire.

The WTS will be the first purpose-built facility in the country capable of supporting fully decarbonised bulk handling and river and road haulage operations, progressively contributing to improved air quality in London. Furthermore, the new facility will also increase WRWA's overall service resilience by providing flexible operational space to respond to emerging regulations requiring the separate management of waste streams (including food and green waste).

Recognising that access to TTT's shaft access zone will need to be safeguarded in perpetuity, the dual- purpose logistics activity area will be fully utilised and support waste container handling and reverse logistics operations, the latter being served by both the existing jetty and local road network. To support these functions, and to enable TTT to comply with its obligations to ensure that its permanent works maintain the viability of Kirtling Wharf for waterborne freight handling, the airspace above the WTS zone will be available for a range of commercial uses, including distribution and warehousing.

The aggregation of Cringle Dock and Kirtling Wharf estates, and the resultant modernisation and intensification of operational floorspace and repurposing of the existing dock and jetty, will provide opportunities to increase the combined operational capacity of the waste and logistics area. In doing so, up to 200 new jobs will be created along with substantially improved public realm.

Mixed Use Zones

Following the commissioning of the new WTS, and the demolition of the former waste facility, a major new residential mixed-use development will be developed in its place. Physically segregated from the new waste and logistics areas to safeguard the security and amenity of its occupiers, the mixed-use zone will benefit from its own vehicle and pedestrian access arrangements. The new mixed-use development will provide approximately 400 new homes and a range of tenure options, including private market/owner-occupier housing, shared ownership and affordable rental properties. It is estimated that circa. 34,000 sqm of commercial office and light industrial floorspace could be developed which could support circa 1,200 – 1,500 jobs depending on the typology of commercial floorspace delivered.

The layout and distinct architectural design of the buildings in this zone will have a coherent and complementary relationship with Battersea Power Station's Phases 5 and 6 masterplan areas while respecting the unique and highly sensitive cultural heritage characteristics of the locality. At ground floor, the new development will include a range of new retail, leisure and food and beverage uses providing essential services while enhancing the vibrancy of the area.

If TTT could agree to permanent bridge cranes being used to service their shaft going forward (as provided for today), then the logistics zone encompassing the shaft access area could also become enclosed. The physical containment of this activity area within an insulated building would more readily enable the Cringle Dock and Kirtling Wharf masterplan area as a whole to integrate into the wider neighbourhood, and in particular significantly improve the prospects of viable residential development coming forward in Phases 5 and 7 of the Battersea Power Station Development.

Indeed, if the airspace above both the retained Cringle Dock and the Kirtling logistics zones became available, it may be possible to deliver an exciting new elevated urban public park, connected by a new east-west Thames footpath and providing onward connectivity to Phases 6 (to the west) and 7 (to the east) as well as access to the proposed Battersea to Pimlico bridge. The occupants of the new residential led development would be able to enjoy access to, and views of, the newly created public realm areas surrounding the development, including the elevated public park, benefits which would also be available to occupiers of Phase 7 and the existing Berkeley Group Riverlight development.

Proposed Changes to the Site Allocation.

In order to secure the above vision, we are proposing the above changes to the Kirtling Street Cluster Site Allocation.

The Kirtling Street Cluster currently contains five site allocations including Site Allocation NE11 (Cringle Dock) operated by Cory.

It is proposed that a new site allocation amalgamating NE9 and NE11 as well as the surrounding land encompassed in the appended masterplan would be created. This would set out the delivery aspirations of the combined waste facility alongside the principles associated with the accompanying mixed-use development. We would welcome the opportunity to work with the Council to develop an appropriate policy and development control framework for the site allocation.

This scope and the proposed change to the allocation change would ensure that the overall aspirations of the Kirtling Street Cluster continue to be delivered. Importantly the draft site allocation would continue to include mixed use development with circa 400 new homes and circa 1,200 – 1,500 new jobs provided to the cluster with business uses on the ground floor and residential use on the upper floors. The key urban design and public realm principles listed in the allocation would also be delivered, including:

The masterplan will seek to improve the transport environment integrating public and private transport with active travel towards and reducing the impact of servicing to the site;

Development proposals will enable walking and cycling connections to the bridge, the riverside walk and street frontages, as well as onward connections to Nine Elms Lane to enable the Pimlico bridge to be realised;

A riverside walk will be provided;

Recognition that NE9, being adjacent to the proposed Nine Elms Pimlico Bridge, the Thames Path and new public open space would be suitable for a landmark building;

The scheme will improve frontages, streetscape, public realm and signage along Cringle Street and Kirtling Street with entrances directly onto those streets and towards the River Thames;

Buildings will front on to Cringle Street and the River Thames above and alongside the waste transfer station;

A high-quality public realm will be provided to the riverside walk drawing upon principles set out in the Nine Elms Public Realm Design Guide; and

An open space that connects to the proposed Nine Elms Pimlico Bridge, the Thames Path and the open space above the TTT access shaft can be delivered.

These are substantial access and public realm benefits which when combined with the wider socio-economic benefits associated with the modernisation of the WTS, creation of new homes and jobs, clearly demonstrate the importance of this development.

Safeguarded Wharves re-configuration

Finally, it should also be noted that the indicative scheme would involve the loss of part of the safeguarded wharf area designated at Cringle Dock (i.e., loss of 0.355 ha). In line with Policy LP40 of the Local Plan and SI15 of the London Plan the scheme would ensure that the overall access to the riverside and the tonnage capacity of the wharves are retained. On this basis we consider the approach to be compliant and supported by policy aspirations to intensify industrial land and capacity for alternative uses.

In addition to the above through Cory's association with the WRWA can offer 0.420 ha of land at Smuggler's Way to compensate for this loss should be it be required because the land to the south-east of the Smuggler's Way site is not currently included in the safeguarded wharf designation. The safeguarded wharf designations for Cringle Dock and Smuggler's Way have been appended to these representations for reference purposes.

Kirtling Street Cluster: Concluding Comments

Overall, we consider that the potential amalgamation of the Cringle and Kirtling estates represents the only viable opportunity to secure essential improvements to critical infrastructure and deliver new housing and employment at a sensitive and important location next to the iconic Battersea Power Station, while unlocking the final phases of the Nine Elms Masterplan.

We look forward to working with the Council, Battersea Power Station and other key stakeholders to help deliver our vision for the area. To this end, the WRWA and Cory are preparing a formal pre-application submission to the Council which will progress the emerging proposals to the next stage of design evolution. It is anticipated that this pre-application meeting could take place in the next 3 months.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. The cluster approach would allow for the potential comprehensive redevelopment of the two sites including mixed-use development accounting for the continued operations of both wharves. The preferred approach is to keep these two sites separate as they are two separate wharves with different functions and their future development potential as one site is still somewhat uncertain. Para 5.29 of the Reg 19 Plan emphasises the development potential of both sites having regard to their safeguarded wharf status. However, it is acknowledged that the wording of the development considerations section could be strengthened to identify the opportunity for the redevelopment of both sites as one including additional waste capacity which could be addressed in para 5.29.
Proposed Change	Amend wording to Para 5.29 (bullet point 2) as follows: 'Para 5.29 Uses ... Development proposals should maximise the <i>development</i> potential for the Kirtling Wharf and Cringle Dock sites (NE9, NE11), having regard to their safeguarded wharf status (in line with LP40 – Protected Wharves) and their important function in the transshipment of freight, waterborne freight handling use and freight-related activities. <i>Proposals should consider the feasibility of the comprehensive development of both sites.</i> Development of these or adjacent sites will require further discussions with relevant parties, in particular the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water.'

Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	692
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy SS1 Spatial Development Strategy and Site Allocation: Kirtling Street Cluster</i></p> <p>We support appropriately sited and designed development and the overall objectives of the Nine Elms Masterplan area, including the Kirtling Street Cluster.</p> <p>The New London Plan sets out that new development should, through the Agent of Change Principle, respect key existing uses and infrastructure and not seek to introduce incompatible uses (through location or design). This is an approach we support and are pleased to see is identified in the Local Plan.</p> <p>To meet future waste management requirements at Cringle Dock and to complement our commitment to sustainability, we have been exploring redevelopment options across our portfolio.</p> <p>The Local Plan review presents an exciting opportunity to establish a clear planning and spatial framework for the Kirtling Street Cluster.</p> <p><i>The Challenges and Opportunities</i></p> <p>The Cringle Dock WTS facility is situated on the site of a Safeguarded Wharf and was originally built in the 1970s as a riparian waste transfer station that pulverised waste before sending it to landfill. In the 1990s it was modified to containerise waste for onward transportation initially to landfill but from 2011 via the river to the Cory owned Riverside Resource Recovery Energy from Waste Facility in Bexley.</p> <p>In the intervening period, Battersea Power Station, supported by Wandsworth Council and Transport for London, have significantly transformed, improved access to and ultimately revitalised the local area, and in doing so secured a future for one of London's most recognisable and important cultural heritage assets.</p>

This presents a challenge and an opportunity which we are seeking to build on. The overarching planning permission (and Section 106 legal agreement) for Battersea Power Station's masterplan recognised that Cringle Dock WTS:

performs, and will continue to perform in perpetuity, an essential public service (supporting the needs of nearly 1 million people, across four London Boroughs) and enables WRWA to perform its statutory functions;

has exceeded its intended design life and requires a substantial programme of redevelopment;

has a demonstrable and immovable requirement to be situated on the river and that there are no other suitable sites in Wandsworth capable of meeting this need; and

It would be difficult, if not impossible, to bring forward Phase 6 of the Battersea Power Station masterplan programme, which envisages over 1 million square feet of mixed use development, without the comprehensive, and sympathetic redevelopment of Cringle Dock.

Over a long period of time, WRWA, Battersea Power Station and Cory have engaged positively and extensively to address the challenges presented above. In 2016, the parties secured planning permission for the comprehensive redevelopment of Cringle Dock. The consented scheme comprised a major residential-led collocation scheme that included 422 new homes and mixed use development on top of a modern WTS, served by a refurbished dock.

Whilst innovative in certain respects, the consented scheme did not materialise for four key reasons:

- 1 The transitional arrangements needed to maintain service continuity during the construction period (including development of a temporary WTS) were found to be unworkable, and would have led to significant service disruption, expense and adverse impacts on local amenity (largely due to the need to divert substantial tonnes of waste by road to a transitional facility unconnected to the river);
- 1 The construction of a substantial residential scheme above a modern waste transfer station would be abnormally expensive, due in part to the need for complex civil and structural engineering and suboptimal or novel access, fire safety and amenity protection measures;
- 1 Preliminary market research by the parties indicated that there would be little appetite for market housing with suboptimal access arrangements and situated above an operating waste transfer station. Sharing a single building envelope in this way would potentially lead to more negative residents- operator interactions, and ultimately more amenity-related complaints. Without a clear route to market, the scheme would be unfundable and therefore undeliverable; and
- 1 Similarly, with increasing concerns relating to fire safety, the parties realised that funding and insurance options for prospective purchasers would be extremely limited, or unavailable.

It should be noted that the Section 106 legal agreement referenced above requires significant interventions to be installed within Cringle Dock and Kirtling Wharf prior to development zone RS2 (Phase 6) being delivered. The previous application at Cringle Dock sought to deliver these and it is simply not viable to do so in isolation on the site. These key issues could not be overcome on the isolated site and thus we sought to explore additional opportunities presented by the potential availability of surrounding land. Of note is the potential to amalgamate Cringle Dock and Kirtling Wharf.

The Solution

Kirtling Wharf, also on a Safeguarded Wharf site, is situated immediately to the east of the Cringle Dock WTS, on the northern side of Cringle Street at the junction with Kirtling Street. The site includes a permanent quay accessed by a jetty and was historically used for concrete batching.

In 2012-2013 Thames Tideway (TT) acquired Kirtling Wharf (and several adjoining sites) and secured development consent for another critical infrastructure project of essential benefit to London, the Thames Tideway Tunnel (TTT). The Development Consent Order (DCO) permitted the applicant to undertake certain works, including to establish a main tunnel drive site for use in constructing, connecting and operating the main sewer tunnel. DCO Requirements KRTST4 and KRTST23 set out the measures required to restore the site following the completion of the works to ensure that its permanent works maintain the viability of Kirtling Wharf for waterborne freight handling purposes. Following the anticipated completion of TTT related works in 2023, it is envisaged that the site will then revert to its long-term freight handling role as intended.

For the reasons expressed earlier, Cringle Dock WTS cannot be viably redeveloped on the existing site. However, following feasibility work undertaken by a multidisciplinary engineering, design, economics and planning team (Wood, Rolfe Judd and Carter Jonas), WRWA and Cory have concluded that the imminent completion of TTT's Kirtling Wharf works, site restoration and market disposal represents a once in a generation opportunity to both replace critical WTS infrastructure (whilst maintaining service continuity) and produce conditions that would support the completion of the Battersea Power Station Masterplan (Phases 5, 6 and 7). In addition, the site vacated by the existing WTS could be brought forward for a major mixed used development, new public realm and access improvements.

The Outcome

By securing a favourable Local Plan allocation, the subsequent amalgamation of the two adjoining estates and relocation of the WTS, would not only unlock the final Battersea Masterplan phases, it would also realise several other important socio-economic objectives; namely:

Secure the future viability of both of the statutory protected Safeguarded Wharves at Cringle Dock and Kirtling Wharf, supporting the Mayor's transport and air quality strategies (requiring modal shift to the River Thames to reduce congestion, improve air quality and safety);

Synergies secured by aggregating the estates will improve access arrangements, layout and building design quality and efficiencies, thereby producing viable operational areas for both waste management and logistics, and in doing so demonstrably reduce the Borough's overall waste management and logistics capacity deficiencies;

Ensure that the WTS continues to comply with the Environmental Permitting (England and Wales) Regulations (including meeting stringent Fire Protection Plan obligations), and is better equipped to comply with the Environment Act 2021 (including emerging regulations requiring the separate management of food, green waste, packaging and recycling);

Satisfy TTT's ongoing tunnel maintenance and emergency access safeguarding requirements at Kirtling Wharf;

- Contribute materially to meeting housing delivery targets in Wandsworth and London as a whole with circa 400 new homes; and
- Support the intensification of industrial, logistics and commercial uses in Wandsworth and London with circa 1,200 – 1,500 new jobs delivered.

To support the above aspirations, we have developed a Cringle Dock and Kirtling Wharf Masterplan Vision. This vision has been split into key zones detailed below and is supported by a Land Use Masterplan for the Kirtling Wharf Site which demonstrates the key benefits the approach can realise for the Council and the wider area. The Masterplan is appended to this representation.

The Waste Management, Logistics and Tideway Tunnel Zones

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Indeed, if the airspace above both the retained Cringle Dock and the Kirtling logistics zones became available, it may be possible to deliver an exciting new elevated urban public park, connected by a new east-west Thames footpath and providing onward connectivity to Phases 6 (to the west) and 7 (to the east) as well as access to the proposed Battersea to Pimlico bridge. The occupants of the new residential led development would be able to enjoy access to, and views of, the newly created public realm areas surrounding the development, including the elevated public park, benefits which would also be available to occupiers of Phase 7 and the existing Berkeley Group Riverlight development.

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This scope and the proposed change to the allocation change would ensure that the overall aspirations of the Kirtling Street Cluster continue to be delivered. Importantly the draft site allocation would continue to include mixed use development with circa 400 new homes and circa 1,200 – 1,500 new jobs provided to the cluster with business uses on the ground floor and residential use on the upper floors. The key urban design and public realm principles listed in the allocation would also be delivered, including:

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Safeguarded Wharves re-configuration

Finally, it should also be noted that the indicative scheme would involve the loss of part of the safeguarded wharf area designated at Cringle Dock (i.e., loss of 0.355 ha). In line with Policy LP40 of the Local Plan and SI15 of the London Plan the scheme would ensure that the overall access to the riverside and the tonnage capacity of the wharves are retained. On this basis we consider the approach to be compliant and supported by policy aspirations to intensify industrial land and capacity for alternative uses.

In addition to the above through Cory's association with the WRWA can offer 0.420 ha of land at Smuggler's Way to compensate for this loss should be it be required because the land to the south-east of the Smuggler's Way site is not currently included in the safeguarded wharf designation. The safeguarded wharf designations for Cringle Dock and Smuggler's Way have been appended to these representations for reference purposes.

Kirtling Street Cluster: Concluding Comments

Overall, we consider that the potential amalgamation of the Cringle and Kirtling estates represents the only viable opportunity to secure essential improvements to critical infrastructure and deliver new housing and employment at a sensitive and important location next to the iconic Battersea Power Station, while unlocking the final phases of the Nine Elms Masterplan.

We look forward to working with the Council, Battersea Power Station and other key stakeholders to help deliver our vision for the area. To this end, the WRWA and Cory are preparing a formal pre-application submission to the Council which will progress the emerging proposals to the next stage of design evolution. It is anticipated that this pre-application meeting could take place in the next 3 months.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted. Detailed Council responses are set out against the parts of the Plan referred to in this representation elsewhere in this document.
Proposed Change	No change considered necessary.
Consultee Full Name	Cory Riverside Energy
Consultee Organisation Details	
Agent Full Name	Tom Lawson
Agent Organisation Details	Senior Planner Rolfe Judd Ltd
Comment ID	693
Title	SDS1 Spatial Development Strategy 2023 - 2038
Number	Policy 1
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	

Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p><i>Policy LP13 Circular Economy, Recycling and Waste Management</i></p> <p>As the owners and operators of the Pensbury Place Transfer Station we would like to reiterate our support for the protection of the site within the Local Plan. Pensbury Place plays an important role as part of our operations within the Borough by performing a waste management contingency / reserve capacity role for our two main operations in Wandsworth.</p> <p>Based on the above and given the wider waste management site capacity deficiency in Wandsworth, it is essential that the Local Plan continues to afford strong policy protection to prevent the loss of the site to other uses and to ensure its continued operational viability.</p> <p><i>Moving Forward</i></p> <p>We trust the above representations from Cory will assist with your consideration of emerging planning policy review and the exciting opportunity to provide the comprehensive redevelopment of the Cringle Dock and Kirtling Wharf site within the Borough and we look forward to working with you over the course of the Local Plan review and development control processes.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Support noted.
Proposed Change	No change considered necessary.
Consultee Full Name	Arnaud Masson
Consultee Organisation Details	RATPDev
Agent Full Name	
Agent Organisation Details	
Comment ID	694
Title	WT17 Wandsworth Bus Garage, Jews Row, SW18
Number	Statement 16
Soundness - Legally Compliant?	

Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Wandsworth Local Plan Review (Regulation 19) 2022Representations submitted on behalf of The Original Tour –Wandsworth Bus GarageWe write to confirm the relocation of the Wandsworth Bus Garage behalf of The Original Tour ('TOT') and RATPDev and support the work undertaken by Strutt & Parker in response to the Council's Local Plan Review (Regulation 19).Relocation of Wandsworth Bus Garage –Site Surplus to Requirements by TOT/RATP Dev.</p> <ul style="list-style-type: none"> •The Original Tour (TOT) is a bus operator and a subsidiary of RATPDev, a private transportation company based in France but operating across Europe and beyond. •The Covid-19 pandemic has had significant implications on the operations at WBG given the change in tourist activities over the last two years. Therefore, TOT and RATPDev have had to review their operations, and have made the decision to relocate to other premises. •The relocation strategy has been confirmed for Q1 2023. •The site is deemed no longer fit for purpose and the cost of upgrading the garage to meet modern standards make staying unviable, therefore the site is surplus to operational requirements by TOT/RATP Dev. •Given the ownership is private there is no need for reprovision of the bus facility on site.
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	LP52 Public Transport and Infrastructure sets out the necessary requirements for development of sites with sustainable transport functions. As the transport use is still required and consultation has not been undertaken with all relevant stakeholders the site's transport uses will be protected.
Proposed Change	No change considered necessary.
Consultee Full Name	Callington Estates Ltd
Consultee Organisation Details	
Agent Full Name	Mr Roger Birtles
Agent Organisation Details	Director Simply Planning Ltd
Comment ID	695
Title	WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18
Number	Statement 67
Soundness - Legally Compliant?	Yes
Soundness - Sound?	No

If not, why?	Positively prepared Justified
Soundness - Complies with Duty to Co-operate?	Yes
Details of reason(s) for representation	<p>Introduction</p> <p>These Representations are submitted on behalf of our client, Callington Estates Ltd and the Trustees of the Callington Trust, in relation to 53 Lydden Grove ('the site') in response to the Consultation on the 'Publication' Draft Local Plan Consultation (Regulation 19). This representation seeks an amendment to the boundary of the Lydden Road Locally Significant Industrial Area (LSIA) and to redesignate the site as an Economic Use Protection Area (EUPA).</p> <p>Our client seeks to redevelop the site to maintain or enhance the existing level of office floor space (previously B1(a) use and now Class E(g)(i) use) within the ground floor of the building and then to erect additional storeys to provide residential dwellings on the upper floors of the building. At regulation 18 stage Simply Planning submitted representation on behalf of our client to the Pre-Publication Draft Local Plan and a copy of these representations is provided as Document 1.</p> <p>In our representations we identified that the site is not being used for an 'industrial' purpose and so the land is not being used for the allocated land use. The representations also highlighted the significant highways constraint and directly adjoining residential dwellings which means that an industrial use is not a viable future land use. Therefore, in accordance with the Secretary of State's direction to the Mayor in adopting the London Plan (2021), it considered that the allocation of the land should be re-considered and this non-industrial land released from the Locally Significant Industrial Area, but retained in mixed office / residential use, to make best and most efficient use of this brownfield site, whilst also assisting to significantly boost the housing land supply.</p> <p>In response to our regulation 18 consultation response the Council concluded that no changes to the Local Plan are considered necessary. The detailed comments are outlined and addressed in further detail below, but these can be summarised as follows: 1. The Council's Employment Land and Premises Study identified that the Council maintain the protection of all SIL and LSIA in the Borough;</p> <p>2. The London Plan states in paragraph 6.4.6 that Boroughs should seek to intensify floorspace capacity in either existing and / or new locations supported by appropriate evidence;</p> <p>3. The draft Local Plan will provide sufficient housing to accommodate the 10 year housing target of 19,500 dwellings.</p> <p>We consider and address these points under a number of headings below. Background The site is located on the western side of Lydden Grove, close to its junction with Twilley Street, which forms the north-western edge of the designated Lydden Road Locally Significant Industrial Area (LSIA). Contained within the site is a part single storey / part two storey building with a total gross floorspace of c. 638 sqm.</p> <p>A Lawful Development Certificate application was approved under application 2015/4948 on 6th November 2015, which established the lawful use of the building as two self-contained office units (Use Class B1(a)). On 1st October 2019, planning permission was granted for the erection of a first floor comprising an additional 327 sqm of accommodation over a major part of the existing single storey sections to the rear of the building under application reference 2019/3033. This planning permission has not been implemented at the site to date, neither has an earlier planning permission from 2017 (reference 2016/6999) which granted a smaller first floor addition to the existing building. The site is located within Flood Zone 2, with some areas of the site also forming Flood Zone 3. Vehicular access is provided into the site from two points, these being gates at the southern extent and northern extent of the site facing onto Lydden Grove. The highway of Lydden Grove is a narrow street with residential properties on the opposite side of the highway to the site, which follow the curvature of the road. A new residential dwelling has been erected to the north of the site, whose boundary wall now abuts the northern boundary wall to the site. On-street parking is provided on either side of the highway and between the northern and southern gateways the highway is restricted through kerb-buildout, cycle-lanes and bollards to a maximum width of 7ft, as shown below.</p> <p>The above restriction is in place to prevent HGV vehicles accessing the wider industrial land to the south via the residential streets of Lydden Grove and Twilley Street. Therefore, traffic to the industrial estate to the south of the site is required to travel via Lydden Road or Bendon Valley. The above restriction creates a significant logistical problem for any occupiers of the site, as vehicles associated with the business occupying the premises are required to travel via Lydden Grove / Twilley Street or Lydden Road, depending on whether they need to arrive at the northern or southern entrance respectively. A further restriction on industrial use is that Planning Permission has been granted for a two storey dwelling on the land immediately adjacent to the north of the site. This dwelling has now been erected with its southern flank elevation directly adjoining the northern elevation of a building within the site. The plans from the approved planning application below shows the close context of this residential dwelling to the site.</p> <p>Given the proximity of this adjoining dwelling, and those to the north of this and on the opposite side of the Lydden Grove, an industrial use of the site would almost certainly have a harmful impact on the residential amenity of the adjoining occupiers. This is especially true if a B2 use of the buildings were to occur, as such a use, by definition, is not appropriate in a residential area. Response to Council's Regulation 18 Comments Loss of Employment Land The full comments from the Council on this issue in their response was as follows: "The Council's Employment Land and Premises Study 2020 (ELPS) has identified a net requirement for 8.6 hectares of industrial land up to 2034. The suitability of the Borough's Locally Significant Industrial Areas (LSIAs) was considered as part of the Employment Land and Premises Study (ELPS), which found that "to ensure that the Borough can meet its demand over the plan period, this study recommends that the Council maintain the protection of all SIL and LSIAs in the Borough". The Council agrees with this recommendation, and does not seek to re-designate this area." It is recognised that, as a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed from the London Plan; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity</p>

in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. This approach set out within the draft Local Plan is considered to be consistent with the that required by the London Plan. The above approach is wholly inconsistent with that endorsed by the Secretary of State for Housing, Communities and Local Government (now the Department of Levelling Up, Housing and Communities) in his letter dated 13/03/2020 he directed the Mayor of London to revise the London Plan by stating the following: "Industrial land: Planning clearly requires a judgement to be made about how to use land most efficiently, enabling sufficient provision for housing, employment and amenity. The Inspectors considered your industrial land policies to be unrealistic; taking an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand. I am directing you to take a more proportionate stance - removing the 'no net loss' requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply." The outcome of this direction has been that there is no requirement to prevent the loss of existing industrial land. Instead, Policy H4 of the London Plan requires all developments that would result in a net loss of industrial capacity to provide a minimum of 50% affordable housing. Policy E6 of the London Plan states that in their development plans Borough should: "designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution" The above approach of Policy E6 is wholly consistent with the comments from the SoS, as it requires London Borough's to use an evidence based approach to determine if allocated industrial sites could be released for other, more pressing, land uses. In the above regard, the Council have used the recommendation of the Employment Land and Premises Study 2020 ('ELPS') as its evidence based to meet the requirements of Policy E6 of the London Plan.

Having reviewed the ELPS we acknowledge recommendation R5 in relation to the retention of existing industrial land. However, the Council's response to our regulation 18 representation fails to consider the other recommendations of the report, these being R1 – R3 which relates to the importance of retaining office space. These state as follows: "R1 - The Council should encourage the intensification and/or redevelopment of poor-quality existing floorspace in the local office market and encourage development of office floorspace in the emerging Battersea Design and Technology Quarter (BDTQ). R2 The Council should continue to monitor changes of use/redevelopment proposals concerning office floorspace in the local office market to ensure that enough floorspace is available for economic growth over the planning period, 2019 to 2034. This includes continuing to enforce its Article Four direction excluding conversion of office floorspace to residential use in certain parts of the Borough. R3. The Council should consider protecting non-designated office floorspace in the local office market by designating them as EPAs where appropriate." The findings of the Employment Land and Premises Study 2020 is clear that the need to protect office floor space from being lost to alternative uses is equally, if not more, important than the loss of industrial land. Paragraph 8.20 of the ELPS identifies that there is a net additional requirement for 22,500 sqm of office floor space. As such, the plan has competing requirements for the candidate site, as it requires both the prevention of loss of office floor space, but also seeks to re-use the land for industrial use. Given the size of the site and the poor vehicular access for industrial use, it is not possible to retain the office use and then intensify this to provide industrial floor space. Our regulation 18 submission and proposal clearly follows the suggested approach of recommendation R1 of the ELPS, as it will seek to allow for the redevelopment of the site to provide a better quality level of office floor space to serve the local market, but also provide some housing on the upper floors to assist in making his viable. Given the poor suitability of the site for industrial use, as explained above, we consider that the previously suggested reallocation of the land to EUPA's would far better accord with the existing land use and the recommendations R1 to R3 of the ELPS. This approach would represent a more viable and realistic prospect to for the site during the next development plan period, when compared to the LSIA allocation which would only permit an intensification of use for industrial purposes only. Housing Delivery Policy SDS1 of the draft Wandsworth Local Plan sets out the spatial strategy over the emerging Plan period. This Policy outlines a requirement to provide a minimum of 20,311 new homes over the plan period, which includes 1,950 new homes per year up until 2028/2029. This meets the requirement set out within the London Plan and it should be stressed that this is a minimum target. The Annual Monitoring Report for the London Borough of Wandsworth show that there have been significantly fewer than 1,950 completions per annum of the last 3 years, including a shortfall of almost 500 dwellings in 2020/21 and almost 600 dwellings in 2019/20. Paragraph 2.67 of the draft Local Plan states that the small sites windfall accounts for 20% of the housing capacity, whilst Paragraph 17.3 of the same document advises that the Council will be pro-active in promoting opportunities for new housing development on all suitable sites, including windfall sites and small sites, to meet its housing requirement.

The site subject to this representation could make a vital contribution to housing supply within the borough, either through redevelopment of the site to produce residential development, or through building upwards and retaining the office use at ground level, as encouraged by Paragraph 120e) of the NPPF. However, the LSIA designation upon the site provides robust restrictions in redeveloping the site this way, despite the land currently not supporting industrial use. Conclusion The site subject to this representation is not within industrial use, despite its location within a Locally Significant Industrial Area (LSIA). Given this, it does not comply with the purposes of the designation. Due to the difficult vehicle access, which prevents large vehicles from easily using both accesses at the site, and the directly adjoining residential dwelling, the site is not suitable for industrial use and so there is little prospect of the building coming into the this use within the near future. The site's location within a LSIA has created an illogical situation whereby the designation prevents the redevelopment of the site to provide further office or residential use, whilst simultaneously not preventing any loss of industrial land. This is clearly against the recommendations of the Employment Land and Premises study, which has identified that the redevelopment of poor office stock in the local market should be encouraged to ensure the Borough meets its office need for the next plan period. It is clear from reading the Employment Land and Premises Study that the site represents a quandary, in that it both office space and industrial land which needs to be protected. However, the clear facts are that it cannot be both. Therefore, a determination needs to be made to whether the site could be put to better use as office or industrial land. In terms of industrial use, our previous regulation 18 representation (see Document 1) and this representation outline why the site is not suitable for such a use, with the main issues being the highway restrictions which dissect the site and prevent large vehicles from entering and exiting the premises and the recent new build residential development which shares a boundary with the candidate site. The site is currently in lawful use as offices and the planning history shows our client is keen to intensify the land for this purpose, given the planning permissions secured at the site. A redesignation of the land to an Economic Use Protection Area (EUPA) would ensure the retention of the existing office floor space within the site, but also allow for the site to be redeveloped to provide further office space or residential accommodation on the upper levels of any future building. This would allow for an efficient re-use of brownfield land by retaining and expanding the existing office floor space, whilst also helping to address the need for additional modern office space in the local market. The redevelopment of the site would also have the substantial benefits of removing the commercial traffic from accessing the site through the adjoining residential streets to the north and also preventing a further industrial use which may cause harm to the residential amenity of the adjoining occupiers. It would also allow the replacement development to provide an active frontage to the river Wandle, which is seen as

	<p>a priority for the character of the area in the draft Local Plan. The redevelopment of the site would have other benefits, such as the replacement of the historic commercial buildings with improved energy efficient and sustainable modern alternatives. In summary, and for the reasons detailed above, we consider that a re-designation of the land from LSIA to a EUPA would assist the Council in meetings its identified housing need and would directly meet a number of the recommendations in the Employment land and Premises study. We would, of course, welcome the opportunity to discuss the potential and our plans for the site at a meeting with Council Officers. However, please let us know if you require any further information in relation to the candidate site ahead of the examination in public for the Local Plan</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comments noted. The Secretary of State's Directions, and their implications for the policies concerning industrial land within the London Plan, are understood. The approach within the published London Plan, as set out in Policy E4, is that "a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution" (Part A).</p> <p>This reflects the requirements of the NPPF, paragraph 82, which sets out that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration", and that they should "set criteria, or identify strategic sites, for local and inwards investment to match the strategy and to meet anticipated needs over the plan period".</p> <p>As identified in response to previous representations, the borough's employment land review (the ELPS) identifies a net requirement for 8.6 hectares of industrial land up to 2034, with the core additional demand being derived from B8 uses (4.7ha) and uses falling under the former B1b/c use classes (1.6ha). Further, and in accordance with the requirements of London Plan Policy E6, the evidence sets out that "employment land within existing SIL and LSIAs remain the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses" (paragraph 8.14).</p> <p>It is recognised that the legal use of the site is as an office (Class E), as established under a Lawful Development Certificate application (2015/4948) in 2015. Prior to that, it is understood that the use of the building was for storage and distribution (see 2014/7188, which states that such a use began more than 10 years before the date of the application), and that it functioned as such with the restrictions to the highway referenced within the representation in place. It is not therefore considered that the site therefore has either poor suitability or little prospect of industrial use in the longer-term and, given the borough's industrial identified need, the Council consider the continued inclusion of this site within the Lydden Road LSIA to be an appropriate and justified strategy.</p> <p>The representation makes reference to the borough's identified need for office floorspace (a net additional requirement for 22,500 sqm), as well as to recommendations within the ELPS encouraging the protection and intensification of existing office floorspace. The requirements for office provision (and indeed the competing requirements for this site) have been considered within the drafting of the Local Plan, and sufficient capacity to meet this need has been identified and allocated in preferential locations (as per the NPPF). This is set out in more detail in the borough's Housing and Economic Land Availability Assessment (HELAA) and reflects the approach set out in Policy LP33 Promoting and Protecting Offices. That notwithstanding, it is recognised that the site has planning permission (2019/3033) to extend the office provision on site, which is currently unimplemented. Site-specific considerations of the site (including the legal use) and the existing designation of the LSIA have therefore clearly not prevented applications for additional office provision on this site through the development management process.</p> <p>It is recognised and understood that the requirements set out in the London Plan reflect a minimum target. The capacity allocated to small sites windfall is based on the London Plan figure, in accordance with paragraph 4.2.3. Comments on London Plan Policy H4 are also noted, however as set out in the previous representation, the borough has capacity to meet its housing requirements in locations that are considered to be more appropriate for this use.</p>
Proposed Change	No change considered necessary

Consultee Full Name	McDonalds PLC
Consultee Organisation Details	McDonalds PLC
Agent Full Name	Mr Ben Fox
Agent Organisation Details	Graduate Planner Planware
Comment ID	696
Title	LP15 Health and Wellbeing
Number	Policy 26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>3 The 400m Exclusion Zone is Inconsistent with National Policy</p> <p>Introduction</p> <p>3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section.</p> <p>3.2 National policy contains no support for a restriction or exclusion zone for hot food takeaways(or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and the sequential approach that seeks to steer town centre uses –which include hot food takeaways-to town centres.</p> <p>3.3Planware Ltd feel that restricting hot food takeaways within 400m of a school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no flexibility in accordance with town centre sites, thus conflicting with the sequential approach. These points are further explained in this objection.</p> <p>Practical Impacts</p> <p>3.4The practical impacts on a 400m exclusion zone around schools would have unacceptable negative land use consequences.</p> <p>3.5Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools and colleges, where a some of pupils will be legally classed as an adult. Additionally, some college and sixth form pupils will have access to a car, making such a restriction unsound. Consideration should also be given to primary school rules, where children are not allowed out of school at lunchtimes and are unlikely to arrive or leave school without a parent or guardian. 3.6No consideration is given to how the 400m is measured. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly. No definition is given to “over concentration”. This needs to be clearly identified and a map provided of existing concentrations to ascertain the actual impact the policy would have site availability across the borough.</p> <p>3.7The Framework does not support the use of planning as a tool to limit people’s dietary choices. In addition to this, other A class uses can provide unhealthy products, therefore, there is limited justification for the proposed Policy LP15 to focus exclusively upon hot food takeaways. Conflict with National Policy</p> <p>3.8The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate.</p> <p>3.9Restricting the location of new hot food takeaway proposals through a 400m exclusion zone around a school is not a positive approach to planning, thus failing to comply with the Framework.</p>

3.10The suggested restriction within proposed Policy LP15,takes an ambiguous view of hot food takeaways in relation to the proximity to all schools.The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.3.11Thus, is consistent with paragraph 80-81 of the Framework.3.12Para 80 states:“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”3.13Para 81 states: Planning policies should:“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;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;c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; andd) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

3.14As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31of the Framework that states that each local plan should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidenceand the lack of evidence should highlight a red flag concerning the draft policy.3.15The policy is likely to be damaging to the district’ seconomy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy.

3.16The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on “Health and Wellbeing”:3.17Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: “opportunities for healthy lifestyles have been considered (eg.planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical

activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);”

3.18Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states: “Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.”

3.19The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include aSui Generis use as being identical.

The Policy is Inconsistent, Discriminatory and Disproportionate 4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generisuse.4.2The test of soundness requires that the policy approach is “justified”, which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).4.3Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.4.4The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald’s. The evidence provided at Appendix 1confirms that 70% of purchases by students in the school fringe were not purchased in a hot food takeaway.4.5If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to hot food takeaways. In fact, by restricting hot food takeaway uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised. 4.6Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that “At least 50% of the days in a year kids don’t go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school.”21The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.2Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt

7For the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal.4.8The policy’s approach fails to acknowledge that the opportunity for children to access hot food takeaways,as part of a school day, is extremely

limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. Only limited purchases of food are made at hot food takeaway on journeys to and from school. Further details are set out in Appendix 2.

5 The Policy is not Justified because of a Lack of an Evidence Base

5.1 The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of hot food takeaways within 400m of a school. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none. 5.2 Public Health England (PHE), which is part of the Department of Health and Social Care, expressly accept that the argument for the value of restricting the growth in fast food outlets is only "theoretical" based on the "unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes." 5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'. 5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper "Weighing the Evidence of Common Beliefs in Obesity Research" (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report). 5.5 There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach.

5.6 In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough's Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games. 5.7 While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence. 5.8 The policy clause about not permitting hot food takeaways in an area of 'over-concentration' must be supported statistically to determine such an area, as it will become a significant part of Policy LP15. Failure to adopt over-concentration parameters does not meet the four tests of the Framework. There is no justification and the draft policy is inconsistent and will likely cause 3 Public Health England & LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013. 4 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.

negative land use implications. Without parameters decision making will be left to officer discretion.

6 Similar Policies Have Been Found Unsound When Promoted in Other Plans 6.1 The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions. 6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'. 5.6.3 Similarly, research by Brighton & Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'. 6.4 The recent Inspector's response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own 'healthy' plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and "confounds its own efforts to improve healthiness of the food provided by takeaway outlets" and failed to "address the demand for the provision of convenience food". The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound. 6.5 The inspector at Nottingham City Council stated "There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended". 6.6 The inspector at Rotherham stated "Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSP". 6.7 In Guildford, the inspector stated "Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to 5 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate. 6 Brighton & Hove City Council & NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011

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 takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound".
 6.8 The proposed 400m school exclusion zone in 'over concentrated' areas is a policy that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity. There is also a clear absence of evidence to suggest restricting hot food takeaway use in 'over-concentrated' will lead to healthier lifestyles or influence an individual's dietary choice.

7 Alternative Approaches

7.1 Planware Ltd considers there is no sound justification for Part B Point 2 of the proposed Policy LP15. Point 2 should therefore be removed to provide consistency and to abide by the Framework.
 7.2 Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached.
 7.3 It is considered until such a time has been reached, point 2 should be removed.

8 Conclusion
 8.1 McDonald's supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy LP15 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald's own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.

8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.

8.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses.

8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald's from major commercial and tourist areas.

8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.

8.6 Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people's daily lifestyle choices is not acceptable.

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. LP15 sets out its emphasis for being in accordance with the London Plan policy E9 D. As part of the examination into the London Plan 2021 a topic paper 'Hot food takeaway 2018' was produced. It examines the impact of hot food takeaways on the health of Londoners; the prevalence of obesity in London; and current national, London and local planning policy on hot food takeaways topic paper. It sets out that a policy that restricts new hot food takeaways within a 400m buffer zone around schools will help to prevent an increase in takeaways within these areas. 400m can be walked in approximately 5 minutes and is the distance adopted by eight London boroughs at the time of writing. National and local planning policy and evidence supports local planning authorities to prevent an overconcentration of hot food takeaways and restrict hot food takeaways in walking distance of schools, due to the impact of takeaways on health and their cumulative impacts on amenity. Restricting permission for additional new hot food takeaways around schools and preventing further overconcentration</p>

	of hot food takeaways in London will make an important contribution to promoting healthy eating across London and contribute towards the aim of the London Health Inequalities Strategy and borough Health and Wellbeing Strategies to reduce childhood obesity
Proposed Change	No change required.
Consultee Full Name	McDonalds PLC
Consultee Organisation Details	McDonalds PLC
Agent Full Name	Mr Ben Fox
Agent Organisation Details	Graduate Planner Planware
Comment ID	697
Title	LP15 Health and Wellbeing
Number	Policy 26
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Introduction 1.1 We have considered proposed Policy LP15 Part B – Health and Wellbeing – with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date.</p> <p>1.2 Within these broad points we have the following policy objections to draft Policy LP15 Part B:</p> <p>A. The 400m exclusion zone is inconsistent with national planning policy B. The policy is inconsistent, discriminatory and disproportionate.</p> <p>C. Examination of other plans have found similar policy approaches to be unsound.</p> <p>D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.</p> <p>1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy Policy LP15 Part B Point 2, which imposes restrictions on restaurants that include an element of hot food takeaway. The policy is unclear as it does not specify what constitutes an "over concentration".</p> <p>1.4 However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform an any appropriate policy response. This has still not emerged.</p> <p>1.5 Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text.</p>

Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. LP15 sets out its emphasis for being in accordance with the London Plan policy E9 D. As part of the examination into the London Plan 2021 a topic paper 'Hot food takeaway 2018' was produced. It examines the impact of hot food takeaways on the health of Londoners; the prevalence of obesity in London; and current national, London and local planning policy on hot food takeaways topic paper. It sets out that a policy that restricts new hot food takeaways within a 400m buffer zone around schools will help to prevent an increase in takeaways within these areas. 400m can be walked in approximately 5 minutes and is the distance adopted by eight London boroughs at the time of writing. National and local planning policy and evidence supports local planning authorities to prevent an overconcentration of hot food takeaways and restrict hot food takeaways in walking distance of schools, due to the impact of takeaways on health and their cumulative impacts on amenity. Restricting permission for additional new hot food takeaways around schools and preventing further overconcentration of hot food takeaways in London will make an important contribution to promoting healthy eating across London and contribute towards the aim of the London Health Inequalities Strategy and borough Health and Wellbeing Strategies to reduce childhood obesity.
Proposed Change	No change required.
Consultee Full Name	Chelsea Cars
Consultee Organisation Details	Chelsea Cars
Agent Full Name	mr Patrick Grincell
Agent Organisation Details	HGH Consulting
Comment ID	698
Title	WT1 Chelsea Cars and KwikFit, Armoury Way, SW18
Number	Map 4.2
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Draft policy specific comments WT1: Chelsea Cars and KwikFit (site allocation)</p> <p>The continued allocation of the site for residential-led development is strongly supported. However, as it is currently worded, the draft allocation will constrain the redevelopment of the site and fail to allow the full potential this important regeneration opportunity to be optimised.</p> <p>Firstly, the draft allocation requires: "Redevelopment of the site should provide a mixed use residential and commercial scheme with at least a 25% increase in the amount of existing economic floorspace..." This is too onerous particularly in the context of the challenges being faced by town centres, not least as a result of the pandemic. To ensure an effective and deliverable policy is included in the Plan, this part of the draft allocation should be revised to include an ambition to retain economic/active ground floor uses as appropriate where it can add to a sustainable and viable mixed-use approach for the site to account for 'market conditions at the time of any application submission'. This revision will allow the delivery of an appropriate amount of economic floorspace at the site (in line with draft policy LP33: Promoting and Protecting Offices), but also protect against the creation of floorspace that cannot be</p>

occupied and that will fail to activate the ground floor frontages (contrary to draft policy LP1: The Design-led Approach). It is noted that the site is located within but on the edge of the Town Centre boundary (as identified by the draft Policies Map). Rather than required the increased provision in edge of centre locations, it is prudent to target economic development towards the more central Town Centre locations with core shopping frontages (as defined by Appendix 3 of the draft Local Plan), such as The Ram Quarter and Southside Shopping Centre. The focused creation of economic floorspace in the centre of the Town Centre will boost vibrancy and activity within this central location. Secondly, the reference to mid-rise buildings within this draft allocation is considered to be inconsistent with both the New London Plan (NLP) and National Planning Policy Framework (NPPF) policies in regard to optimising site capacity through a design-led approach. The NLP requires all development to make the best use of land to optimise the capacity of sites (policy D3), including site allocations. NLP policy D9 outlines that tall buildings are appropriate in principle, taking account of:

- The visual, functional, environmental and cumulative impacts of tall buildings;
- Their potential contribution to new homes, economic growth and regeneration; and
- The public transport connectivity of different locations. 3 hghconsulting.com Given the site's location within the Town Centre boundary and the site's high PTAL range between 6a and 4, the draft allocation should reflect the NLP policy D3 and D9 with the site's identification as an appropriate location for taller buildings. The scale of any redevelopment of the site should not be constrained by overly restrictive policy requirements that will adversely impact on viability and most likely deter any development proposals from coming forward. Instead, the scale of development should be optimised, given the site's central urban location, with the focus being on design quality and placemaking (as required by draft policy LP1). Chelsea Cars is supportive of the reference to the more comprehensive redevelopment of the wider area, incorporating properties on Wandsworth High Street and Putney Bridge Road currently outside of the draft allocation boundary. However, the draft allocation also includes reference to the "TfL scheme" to improve the Wandsworth Gyratory: "Parts of these properties [included within the allocation and on Wandsworth High Street and Putney Bridge Road] will be required to implement the TfL scheme programmed to be implemented by 2024 - and will be acquired by TfL." At present, there is no evidence of any deliverable proposals for the "TfL scheme". In the most recent update published by the Council on 10th March 2022, a cabinet member for the Strategic Planning and Transportation Committee confirmed the delays to the work were due to lack of funding "for one reason or another" with TfL expected to seek funding from the Department for Transport. This confirms the undeliverability of the TfL scheme, and by association further compromises the deliverability of this site allocation, which directly impacts the soundness of the Plan. In line with the above, Chelsea Cars seeks the amendment of the draft site allocation, removing the too restrictive reference to the increase in economic floorspace and the limitations proposed for building heights, in addition to removing reference to the TfL scheme, given the lack of evidence to confirm its deliverability. Greater flexibility in the allocation would better reflect the positive contribution any redevelopment could have for the Wandsworth Town area through the delivery of a viable and well-designed scheme. Such amendments will ensure that the site allocation is justified, positively prepared and consistent with national policy.

Change(s) considered necessary

Wishes to attend Hearing Session

Reason why

Council Response

Support noted.

The site allocation retains the approach set out in the adopted Local Plan (Employment and Industry document, 2018), which requires at least a 25% increase in the amount of economic floorspace (referring to then B classes and to sui generis floorspace). As identified at the time, it remains one of the few sites with the capacity to provide a significant increase in economic floorspace, for which there remains an identified need as set out in the borough's Employment Land and Premises Study (2020). This approach is considered appropriate and justified, and is consistent with the NPPF paragraph 82, which requires the identification of sites to match the borough's economic strategy and to meet anticipated needs over the plan period.

The approach to building height in this area is considered sound. The height parameters have been set using the evidence of the Urban Design Study (UDS) which distinguishes this overall area as a 'restore' area as per the characterisation assessment of the UDS. The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough. In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.

TfL have recently confirmed that the removal of the Wandsworth Gyratory is expected to begin in 2025 and therefore it should be retained in the site allocation.

Proposed Change	No change considered necessary.
Consultee Full Name	Chelsea Cars
Consultee Organisation Details	Chelsea Cars
Agent Full Name	mr Patrick Grincell
Agent Organisation Details	HGH Consulting
Comment ID	699
Title	LP4 Tall and Mid-rise Buildings
Number	Policy 15
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>Draft policy LP4: Tall and Mid-rise Buildings</p> <p>Further consideration of NPPF paragraph 119 (effective use of land) and 124 (achieving appropriate densities) as well as the NLP policies D3 (optimising site capacity) and D9 (tall buildings) are required to ensure that this draft policy is compliant with the regional and national planning narrative. As currently drafted, Appendix 2 of the draft Local Plan identifies zones for tall and mid-rise buildings and includes the site within a “mid-rise building zone” at map 23.36: Wandsworth Town and Common. There is also reference to the site capability to accommodate 5 storeys. However, as stated above, such an approach fails to optimise the potential of this key regeneration opportunity. The Local Plan should be seeking to make the best use of this sustainable and accessible town centre location to optimise site capacity with a design led approach. This will assist in ensuring the Local Plan is consistent with the NPPF, is positively prepared and is sound and deliverable. In considering the development of the site in line with the proposed on-site requirements and uses set out in the draft site allocation, if the development was limited to 5 storeys, it would be difficult to create any articulation of building height and massing within the surrounding and existing street scene. With a limit of 5 storeys, the urban design opportunities are stifled, with the inability to create a distinctive, high-quality development in this town centre location, contrary to the design-led approach set out at draft policy LP1. By ensuring consistency with NLP Policy D9 and by enabling the use of tall buildings in appropriate locations, the Local Plan would allow the development of sites to achieve high-quality design and more viable schemes to assist 4 hghconsulting.com in meeting the wider, overarching objectives of the emerging Local Plan. This flexibility will protect the principles of the Local Plan, whilst allowing sites to be tested on a site-by-site basis during the planning application process. Chelsea Cars seeks the amendment of this draft policy to ensure that it is justified and does not limit the prospect of achievable development of sites, such as site allocation WT1. Specifically to: • adjust the existing reference to increasing commercial floorspace to allow for a more realistic market led approach for the redevelopment of the site; • remove the reference of the site within a mid-rise location as is likely to stifle regeneration and fail to optimise the redevelopment opportunity arising; and • remove reference to the 5 storey limit for the reasons set out above and to encourage a more design led approach to delivering a high quality redevelopment to form an appropriate gateway to the town centre. Conclusion On behalf of our client Chelsea Cars, we have set out our representations objecting to the emerging LB Wandsworth Local Plan (Regulation 19) as currently drafted. This includes a number of considerations that would both assist with facilitating the positive redevelopment of our client’s site and also with the creation of a ‘sound’ Local Plan and would ensure that the policies are future proofed and consistent with the adopted regional and national policy narrative. Thank you for the opportunity to submit the above representations and we would be grateful if you could acknowledge receipt. We would welcome the opportunity to meet with Officers at the earliest opportunity to discuss the points raised. If you have any questions or wish to discuss any of the enclosed in further detail, please do not hesitate to contact me or my colleague Ellie Fowler.</p>
Change(s) considered necessary	

Wishes to attend Hearing Session	
Reason why	
Council Response	<p>Comment noted. Policy LP4 is considered sound. The Policy sets out clear design expectations, is consistent with the NPPF, PPG and London Plan Policy D9 and is supported by the GLA as stated within their Reg 19 representations.</p> <p>The height parameters have been set using the evidence of the Urban Design Study (UDS). The UDS is a robust design-led evidence base document which establishes a comprehensive understanding of the context and policy background, in national policy and design guidance. The height parameters are based on a characterisation process which is informed by industry guidance set out by the Landscape Institute, Natural England and the Greater London Authority (GLA). The methodology is refined to suit the particular characteristics and constraints of Wandsworth. This process informed an assessment for the capacity for growth by assessing the sensitivity of character areas to establish high sensitivity areas unlikely to have capacity for development without adverse effects on the townscape; alongside areas of medium and low sensitivity with the potential for targeted or larger scale growth. Simultaneously, the 'probability' of change is assessed, analysing the borough in terms of aspects such as public transport accessibility, land availability and planning policies. Sensitivity and probability are considered together to understand the potential development capacity of the borough.</p> <p>In determining a planning application, the Council has regard to the Local Plan as a whole and the requirements of LP4 would form part of that consideration.</p>
Proposed Change	No changes considered necessary.

Consultee Full Name	Rachel Holmes
Consultee Organisation Details	Planning Advisor Environment Agency
Agent Full Name	
Agent Organisation Details	
Comment ID	701
Title	LP60 Moorings and Floating Structures
Number	Policy 71
Soundness - Legally Compliant?	
Soundness - Sound?	
If not, why?	
Soundness - Complies with Duty to Co-operate?	
Details of reason(s) for representation	<p>LP 60 Moorings and Floating Structures</p> <p>We welcome that Part A6 and A7 have been incorporated into the policy to highlight the flood risk and biodiversity considerations of moorings and floating structures development. To strengthen them they could reference back to other policies that give more detail on these aspects, e.g. A6 could reference Policy LP 12 and A7 could reference Policies LP53, LP55 and LP58.</p> <p>Recommended action: We recommend referencing Policy LP 12 in part A6 and Policies LP53, LP55 and LP 58 in part A7 of Policy LP 60.</p> <p>Part C states '<i>The culverting of river channels and watercourse will not be permitted, and the naturalisation of river channels and watercourses will be sought as part of development proposals where appropriate and feasible</i>'.</p> <p>We fully support this policy wording. We would recommend considering whether this wording fits better within Policy LP58 (River Corridors) rather than LP60 (Moorings and Floating Structures).</p> <p>Recommended action: We recommend relocating Part C of Policy LP60 to become a new lettered bullet point in Policy LP 58.</p>
Change(s) considered necessary	
Wishes to attend Hearing Session	
Reason why	
Council Response	Comment noted. LP60 Moorings and Floating Structures is considered sound. In this instance it is not considered necessary to include cross referencing as suggested. Part C of Policy LP60 is considered sound as written.
Proposed Change	No change considered necessary.