



**LONDON BOROUGH OF WANDSWORTH**

**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**

**WRITTEN STATEMENT**

**MAIN MATTER 3:**

**WANDSWORTH TOWN**

**(POLICIES PM2, WT1 - WT22)**

**WEDNESDAY 16 NOVEMBER 2022**

**Abbreviations**

- AMR – Authority Monitoring Report
- CIL – Community Infrastructure Levy
- GIS – Geographic Information System
- HELAA – Housing and Economic Land Availability Assessment
- LP – The London Plan
- NDG – National Design Guide
- NPPF – National Planning Policy Framework
- NPPG – National Planning Practice Guidance
- SHLAA – Strategic Housing Land Availability Assessment
- UDS – Urban Design Study
- WLP – Wandsworth Local Plan

**Is the area strategy and are the site allocation policies for Wandsworth Town justified by appropriate available evidence, having regard to national guidance, local context, and are they in 'general conformity' with the LP?**

The Areas Strategies in the Local Plan have been developed using a consistent approach having had regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 3 to 11, this is set out once for the sake of brevity, in a separate Written Statement covering PM2 – PM10 inclusive. Each of the Main Matter statements in relation to each individual Area Strategy will therefore only cover matters of relevant to that place.

The Area Strategy policy (PM2) and site allocation policies (WT1-WT22) for Wandsworth Town are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

The primary sources of evidence are as follows:

- [Retail Needs Assessment](#) (SD-041)
- [Urban Design Study](#) (SD-054)
- [Local Implementation Plan](#) (SD-058)
- [Ram Brewery Cultural Strategy \(December 2013\)](#) (SD-069)
- [Wandle Delta SPD](#) (SD-076)
- [King George's Park Management and Maintenance Plan](#) (SD-091)

The below outlines how the evidence which supports the Area Strategy has been prepared and how it meets the requirements set out in the question.

*Introduction*

Wandsworth Town Area Strategy is in accordance with the London Plan and defined by it as a main town centre with a night time economy of more than local significance.

In the case of Wandsworth Town, the Area Strategy covers:

- the central core of retail, leisure and commercial services which are a focus for communities and neighbourhoods and those who rely on it, and
- the immediate surrounding context – including the high Street, Wandle Delta and King George's Park – which is a major focus for change and regeneration within the borough as a whole.

The Wandsworth Town Area Strategy area is well connected by transport, including buses and trains, and the constituent parts have different and unique characteristics drawn

principally from their location and heritage. Focusing policy activity on this place can help to bring significant improvements to the environment and infrastructure and allow people to meet many of their daily needs without the need for excessive travel. Focusing attention here helps to protect the specific characteristics of Wandsworth Town and improve areas in need.

**Policy PM1** provides an overarching guide to development and also points to any specific supplementary guidance. Within Wandsworth Town, the Wandle Delta SPD (SD-076) provides detailed information on the requirements for sites within the defined Delta area, but bespoke strategies for the Ram Quarter (Cultural Strategy, SD-069) and King George's Park (Management and Maintenance Plan, SD-091) are also relevant. There are considerable heritage assets addressed in the Wandsworth Town and Old York Road Conservation Areas alongside further conservation areas just beyond the town.

Wandsworth Town Area Strategy has 22 allocations located all across the area with many contributing to the redevelopment of the Wandle Delta between the town centre and the River Thames. Each of these sites has been assessed through the HELAA process to provide an overall housing capacity of 3,510 dwellings, which is reflected in Policy SDS1. Further detail on how each site should come forward is set out within WT1 – WT22, and these are set within the context of other policies within the Plan (e.g. LP4, Tall Buildings) and with reference to one another where this is appropriate.

*Developing the Placemaking Policies: PM2 Wandsworth Town*

The Area Strategy boundary is based on the defined town centre boundary along with the relevant site allocations to ensure they capture the whole context as best as possible. A buffer of 100m is added to this to express the indicative nature of the Area Strategy boundary. In Wandsworth Town, the boundary captures Old York Road, the major areas of change around the Wandle Delta and Pier Wharf / Wandsworth Bridge, Southside and the King George's Park and the areas west of the Wandle Delta towards Wandsworth Park.

Whilst the Area Strategies provide focus, development outside of the areas would need to be cognisant of, and have regard to, them. This Area Strategy overlaps with the Riverside Area Strategy and the Wandle Valley Area Strategy (see Matters 10 and 11 respectively).

Wandsworth Town has key links to other places via East and West Hill, Garratt Lane, Putney Bridge Road, York Road and Trinity Road.

*Wandsworth Area Strategy: Local Plan Evidence Base*

Alongside its setting within the national framework, the policies and strategy of the London Plan and the Vision and Objectives of the Local Plan, the Wandsworth Town Area Strategy responds to its current context and character. Analysis of the context and character for the Plan is informed by the comments to the Plan made by residents and people who know the centre, including landowners and developers with interests in the town.

At the current time, Wandsworth Town can be defined by:

- Its role as a major town centre which combines a modern shopping centre with a historic high street
- The Ram Quarter, a collection of distinctive industrial buildings that have been rejuvenated and repurposed along the river
- Its location on the Wandle, and a desire to reconnect with these water frontages
- The changing Wandle Delta, a former concentration of industrial and service uses around the mouth of the Wandle and on the Thames Waterfront which is changing slowly into a residential district, but still contains important industrial activities such as the waste transfer facility
- A dominant road system in the Wandsworth Gyratory, which is heavily trafficked and difficult for cyclists and pedestrians to use
- Wandsworth Town station and Old York Road, on the eastern edge of the area, but with a distinct and vibrant atmosphere
- King George's Park, a multi-purpose and popular town park and riverside open space which suffers from poor access from the town itself

Wandsworth Town has a varied character, ranging from historic buildings serving civic, industrial and residential use to modern residential and commercial developments. This diversity creates a rich townscape and distinctive place that reflects the continued significance of Wandsworth Town as a centre of civic life.

Largely because of its manufacturing history, the area saw early development of non-conformist communities, associated with a desire to live, work and worship close together. As a result, historic buildings are grouped and sited in specific relationships, with houses and industry cheek-by-jowl (e.g. Ram Brewery). Combined with modern interventions, and particularly the busy High Street, Wandsworth Town can feel chaotic and overwhelming.

Building heights across the area range from between 2-4 storeys through to towers up to 27 storeys. The latter form the residential component of the renovated Southside Shopping Centre, which collectively form a distinctive feature to the northern end of Garratt Lane, its junction with Wandsworth High Street and the northern end of King George's Park.

The gyratory and the underutilised nature of the Wandle at its mouth tend to separate the town centre from the River Thames but, at the riverside, the Thames creates a sense of openness through the extent of views across and along it, whilst the local boat traffic and the piers and moorings provide vibrancy and interest. The development of the Wandsworth Riverside Quarter has created a place which has supported greater public access to these positive attributes and enhanced part of the Thames Path which is valued for its leisure opportunities.

The Vision for Wandsworth Town, based upon this assessment of its character, context and assets, is set out in the Plan at para. 4.16, and features:

- Maximising opportunities to support inclusive growth through flexible, mixed-use development;
- Increasing active travel and providing an inclusive, connected and enhanced public realm that puts people first;
- Improving the Wandle and Bell Lane Creek within the Delta to deliver improvements to the townscape and to biodiversity in the river corridor;
- Supporting the viability and vitality of the town centre and enhancing the role of Southside;
- Facilitating improvements to landmark buildings, including the town hall and celebrating the town's rich heritage.

The Plan defines a clear anchor for change in Wandsworth Town around the TfL proposals for the Wandsworth Gyratory, including its associated public realm improvements. The Council has a strong ambition to see its delivery recognise the wider placemaking, economic regeneration and health benefits that the scheme will provide to the area, to existing and future Wandsworth residents and businesses. To this end the Council has committed to partially fund the scheme and will continue to work with TfL to secure its delivery<sup>1</sup>.

The Area Strategy sets out 22 allocations across the area and each one plays a role in the wider picture for the town. Some of the sites are clustered together<sup>2</sup> to emphasise the importance of the inter-relationship between sites, which is also captured in Policy PM1(C).

Within the Placemaking policy, PM2, the understanding of the place combined with the analysis and general direction has given rise to a specific policy approach geared towards

---

<sup>1</sup> See also Matter 19.

<sup>2</sup> There are six clusters in Wandsworth Town: Frogmore Depot, Gasholder site, Feather's Wharf & Smugglers Way, Wandsworth Bridge, Ferrier Street and Swandon Way

achieving success, couched in the wider needs of the borough. Amongst the main issues arising in PM2 are:

- The approach to tall buildings;
- Public realm and connectivity, alongside promoting active travel;
- The health of the town centre as a focus for the community's needs, and the balance to be given towards modern and traditional environments
- Enhancing blue and green infrastructure, particularly in respect of the River Wandle and new and existing public spaces and parks;
- Biodiversity, both within the enhancement of riverside environments and in new buildings (e.g. through roofplates);
- Heritage, particularly in landmark buildings, shopfronts and traditional streets, and where this supports cultural and creative improvements.

To this end, the key evidence specific to Wandsworth Town has been the Urban Design Study (SD-054), the Retail Needs Assessment (SD-041) and the Local Implementation Plan (SD-058). The Wandle Delta Masterplan SPD (SD-076) provides a detailed context in respect of this specific area. Other documents, such as the [Arts and Cultural Strategy](#) (SD-065), [Securing the Future of Wandsworth Town Centre](#) (SD-077) and the [Wandsworth Environment and Sustainability Strategy](#) (SD-056) have informed the overall approach.

The Urban Design Study provides a detailed assessment of the nature of the town centre. It recognises the history and growth of the town through centuries, and the erosion of the 'tight-knit' nature of the historic town by the needs of the modern world – the coming of railways and the major roads coupled with the demise of the importance of the Wandle, and the increases in development density and height that have transformed the way Wandsworth is today. It recognises Wandsworth Town as a major redevelopment zone focused on the High Street, Wandle Valley and the River Thames. The Study picks up on the Valley setting, and what this does for long views, and notes the structure of the older town, often framed by gateways and landmarks, such as Book House and St. Thomas's Church. It notes the negative quality of the connections between the town's commercial core and the Thames riverside, and the continued dominance of large industrial buildings and their associated activity and environments. The Study recommends a restorative approach to the existing character, by improving maintenance of remaining characteristic features, restoring historic characteristic features that have been lost over time, and ensure the future growth of the area reinforces existing character.

The Retail Needs Study makes a focus of maintaining the town's status as a major centre, and reducing the relatively high vacancy rate. Wandsworth's strength is the Southside centre which offers a modern, traffic-free and purpose built environment for retail, leisure and food and drink. However, in defining the strategic priorities for the centre, there is a recognition that the pedestrian environment, wider linkages to the broader town centre and the relationship with the rivers suffer from through traffic and a relatively poor environment. The Study only really considers the retail core, and so makes no comments on Old York Road.

The Local Implementation Plan highlights the Council's Corporate Strategy objective to work with Transport for London on options to improve the Wandsworth Gyratory (one-way traffic system). The LIP reiterates the objective, set out in a past TfL Business Plan, to remove the gyratory and re-route traffic from the town centre, in partnership with Wandsworth Council. The benefits that this would bring are referenced in the Wandsworth Town's anchor for change, in Policy PM2 (Placemaking and People First) and across Site Allocations WT1 / 2 / 4 / 12 / 13 / 16 / 19 / 20, thus demonstrating the impact this proposal has on the whole town centre and the coordination over a number of sites to realise it. The LIP highlights the strategic CIL that has been allocated to the project. In addition to this major project, the LIP highlights other actions intended to improve the centre, some of which are common to other place / centres in the borough (accessibility improvements to Wandsworth Town station, reduction of air pollution, promotion of cycling / walking).

The Wandle Delta Masterplan SPD covers the area in Wandsworth Town between Armoury Way, Putney Bridge Road, Old York Road and the river. It aims to guide the physical aspect of future changes in the area and bring about a series of high quality developments that will contribute to a wider, cohesive vision for Central Wandsworth and the Wandle Delta. It was adopted in accordance with the current adopted Development Plan (which in Wandsworth encompasses the Core Strategy, Development Management Policies Document, Site Specific Allocations and Employment and Industry Document) but straddles the adopted and submitted plan. The SPD contains a full assessment of the area's evolution, history, heritage and potential, alongside the wider ambitions for the area couched within the wider Wandsworth Town context and, importantly, aware of the emerging Area Strategy for Wandsworth Town contained in the submitted Plan.

Overall, the Area Strategy, in combination with the 22 Site Allocations, are justified by appropriate available evidence in the context of national guidance and local context. The Area Strategy brings together available and developable sites to transform Wandsworth Town and its riversides to both deliver new housing and employment opportunities whilst



improving the quality of and access to blue and green infrastructure. The Strategy, with the Allocations enables the delivery of major infrastructure improvements – notably changes to the Wandsworth Gyratory – and seek to maintain the town’s status as a major centre whilst respecting and engaging with the heritage and creativity evident in the town and its community. It aims to restore the balance between people and traffic, generating opportunities for active travel and enabling better walking and cycling network whilst improving access to parks and water. The Council has the planning tools – notably through the emerging Local Plan and the adopted Masterplan SPD – to set out its vision, provide certainty to developers and to deliver the vision.

The Spatial Area Map at 4.1 shows how the different considerations are brought together.

Wandsworth Town’s Area Strategy received several representations during the Regulation 19 consultation which commented on the overall strategy in PM2 and on some of the sites. These have not resulted in significant pre-hearing proposed modifications.

***Do the housing land site allocations in Wandsworth Town show how they will contribute to the achievement of the WLP’s overall housing requirement of at least 20311 new homes and its timescale for delivery?***

The estimated capacity and delivery for the specific housing site allocations is published in the Authority Monitoring Report on Housing and forms part of the unpublished background information of the HELAA (SD-047) <sup>3</sup>(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 2,885 together with the 625 capacity of other non-allocated sites make up the total housing capacity for Wandsworth Town as shown in table 2.2 (New Home Distribution) of Policy SDS1. As set out in Policy SDS1, the Council considers that stating the overall capacity for each Area Strategy area, alongside the total capacity for the borough, is the most appropriate strategy for setting out how the borough will meet its housing requirement. Site specific capacities and details of the assessment of housing land site allocations have not been provided in the Site Allocations of the Local Plan or in the HELAA (SD-047) as it is not considered helpful and may prejudice the planning consideration of a site. This is consistent with the Greater London Authority’s Strategic Housing Land Availability Assessment (SHLAA) 2017 methodology, and avoids any pre-emption of the planning application process in establishing appropriate built form and densities for sites.

---

<sup>3</sup> The list of sites with capacities were not published to avoid any pre-emption of the planning application process in establishing appropriate built form and densities for sites. This is consistent with the SHLAA methodology.

However, for the purpose of assisting the Inspectors on the WLP examination process, the estimated capacity figures, and phasing for each Site Allocation are contained in Appendix 3 to written statement MM2 'Spatial Development Strategy'. Appendix A shows the estimated capacity for each site, which form part of the overall housing capacity figure set out in table 2.2 of Policy SDS1.

For sites with pending or approved planning permissions, the assessment of development potential relied on the levels of development identified within the permission, factoring in a probability of deliverability for pending permissions. For other sites, estimates of development potential, suitability, availability and achievability followed the methodology as set out in the HELAA (SD-047), which followed the methodology within NPPG Housing and Economic Needs Assessment 2020.

Estimates for housing potential on sites are derived from the Council's Urban Design Study (UDS) (SD-054), which applies a design-led approach to identifying capacity in accordance with Policy D3 of the London Plan. The methodology used for estimating the development potential is set out in greater detail in the UDS in Appendix H (SD-054). The capacities identified within the UDS are then adjusted, as appropriate, to account for existing residential uses and/or alternative uses anticipated on site, including those contributing to the economic capacity. It is important to note that the estimates derived from the UDS are indicative for the sites without planning permission and do not give a definitive number of units to be provided on site, as the ultimate capacity will be determined by the assessment of a planning application in accordance with the Local Plan.

For each site allocation a judgement was made on whether development on each site is likely to be viable and when it would likely come forward for development. Sources of information supporting this judgement included: (1) The Urban Design Study (SD-054) (2) The Wandle Delta Masterplan, which the Council has adopted as a Supplementary Planning Document (SD-076); (3) Pre-application records (which are confidential); (4) The results from the call for sites consultation; and (5) Knowledge of the site and landowner intentions and propensity to develop the land. (This involves an assessment of the 'history' of development of the site, for example, if it has previous planning applications submitted/approved or any pre-application discussions. Or if there are any known ownership issues that may make it less likely to come forward until resolved). Further review, site by site, of the housing and economic capacity has also been undertaken to account for any changes required as a result of new evidence or policies relating to: (1) Physical constraints based on GIS hazard, constraint and policy layers in the Local Plan (which include flood zone layers, local views, policy areas and protected views); (2) Existing built form and

building heights; (3) Existing heritage and sensitivity to growth (based on on-site or adjacent designated heritage assets, and findings of the Urban Design Study); and (4) Ownership, based on known constraints. (This is following the PPG on HELAA, if there have been any changes to the ownership of the site or legal impediment for development.)

Estimated timescales for housing delivery were assigned to the phases used in the London SHLAA, for comparability: (1) 2019/20–2023/24; (2) 2024/25–2028/29; (3) 2029/30–2033/34; and (4) 2034/35–2040/41. Development phasing was then annualised to each year between 2019/20 and 2039/40 inclusive, to allow for comparison to the proposed Plan period of 2023/24 to 2037/38. Housing delivery phasing details for the Site Allocations in Wandsworth Town are contained in Appendix 3 to written statement MM2 ‘Spatial Development Strategy’.

On the majority of the Site Allocations, the Council is already in discussion with the landowners, and it would be considered inappropriate to be more prescriptive within the Site Allocations, such as setting out a range of residential units or commercial floorspace to be delivered, as these discussions need to take place with the relevant landowners on a site-by-site basis, informed by discussions such as on site specific circumstances, local needs and viability, to ensure flexibility and effective delivery. Some of the sites represent longer-term opportunities, for key sites due to their siting or size, where the Plan seeks to influence development should they come forward through planning, and it would be unrealistic to specify content at this early stage.

**Deliverability - Other supporting evidence:**

In addition to the Wandsworth Town Area Strategy site allocations, to assist deliverability of these sites, the Council has produced the Wandle Delta Masterplan SPD and the Wandsworth Town Delivery Framework.

As set out in the 2021/22 Housing AMR, sites within this area are expected to come forward for development in the short and medium term. The Wandle Delta Masterplan SPD (SD-076) has been produced to provide further guidance on the development of mixed-use development expected within this area in support of both the adopted and emerging Local Plans. The SPD was prepared in the form of a Masterplan to provide planning and design guidance to developers, and to help guide the preparation and assessment of future planning applications in the Wandle Delta area. The SPD was developed using an iterative process, allowing key stakeholders to shape the proposals.

The Wandsworth Town Delivery Framework (SD-077) has been produced alongside the emerging Local Plan to maximise the recognised development potential that exists in

Wandsworth Town and the Area Strategy area. The Framework identifies positive actions and is intended to act as a catalyst to investment; it serves as a guide to bring development and other infrastructure schemes forward, thereby supporting the emerging Local Plan, i.e. the Regulation 19 version. The Framework is intended to act as a guide for focusing resources and, where appropriate, investment by the Council and its partners to bring forward actions that are complementary to, and will help to maximise the benefits of, new development. This includes identifying where a more strategic approach is needed to support the achievement of site-specific requirements, which will be of benefit to the Town Centre and surrounding area. The clear spatial framework provided in the Local Plan will also provide clarity for landowners and commercial investors and facilitate investment decisions that can support the Council's vision.

The Delivery Framework provides the opportunity to identify and bring together a number of initiatives and requirements that are key to ensuring the success of Wandsworth Town Centre as a place. The Local Plan subject to this examination and the adopted Wandle Delta SPD form the planning benchmarking, whilst the Framework was produced to identify positive actions that can be taken both by the Council, including as landowner, and through its ability to bring partners together to make things happen, which is a critical component in giving investors the confidence to establish themselves in Wandsworth Town. This in turn will support the delivery of key development sites and attracting new businesses, jobs and homes. Wandsworth Town Centre has seen significant investment over a number of years resulting in the transformation of Southside, regeneration of the Business Village, Ram Brewery and South Thames College sites. There are two further major proposals, which will support the next phase in the Town Centre's transformation. These are the proposed regeneration of Wandsworth Town Hall and the removal of the Wandsworth Gyrotory one-way system.

In summary, Policy SDS1 sets out the housing capacity for the Wandsworth Town Area Strategy area, which the site allocations will contribute towards. It is not considered prudent to specifically state specific capacities for each of the sites for the reasons set out above. The estimated capacities can be found in the residential Authority Monitoring Report to give an indication of how the sites will contribute to the achievement of the overall housing requirement. The Council considers that the Local Plan placemaking policies of the Area Strategy and site allocation details, together with the supporting strategy of the Wandle Delta SPD (SD-076) and Wandsworth Town Delivery Framework (SD-077), give a suitable development strategy, which promotes delivery to support achievement of the housing requirement in accordance with the expected rate of delivery set out in the housing trajectory for the plan period.