Wandsworth Local Plan Examination

Examination in Public Hearing Statement for Main Matter 2

Hearing Statement prepared by Savills (UK) Limited on behalf of Charities Property Fund

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1. Introduction

1.1.   This Statement is prepared by Savills (UK) Limited on behalf of Charities Property Fund c/o Savills Investment Management ('**SIM**') in respect of the examination of the Wandsworth Local Plan ('**WLP**'). It provides SIM's response to the Main Matters, Issues and Questions ('**MMIQs**')[1] identified by the Inspectors in respect of Main Matter 2: The Spatial Strategy.

1.2.   SIM owns the land at 200 York Road in Battersea which is currently occupied by a hotel (Travelodge) ('**Subject Property**'). The land has been actively promoted for development as part of the consultation for the emerging Local Plan. This includes representations submitted to the LP Publication (Regulation 19) Version in February 2022.

1.3.   The Subject Property is allocated (Site RIV 10) for development of up to 10 storeys which does not represent optimisation of the site nor the best use of land.

1.4.   It is imperative that Wandsworth has an up-to-date WLP which provides the policy framework to support sustainable development and growth in accordance with the strategic objectives of the National Planning Policy Framework ('**NPPF**').   As currently drafted, the WLP does not achieve this and as such it must be found to be unsound.

1.5.   We conclude that the Plan has not been prepared in a way that makes the best use of land and as such, it fails to promote sustainable forms of development in direct conflict with the NPPF.

1.6.   This Statement should be read alongside SIM's statements in relation to Main Matters 1 and 10.

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[1] ID-02

2. Main Matter 2: Spatial Development Strategy

Is Wandsworth's spatial strategy and the distribution of development as set out in Policies SDS1 and PM1 (Area Strategy and Site Allocations Compliance) supported by robust and up to date evidence and otherwise soundly based?

2.1.   SIM supports the broad principles of the spatial strategy of the WLP. Map 2.1[2] combined with the individual area strategies and tall building zones provide a strategic and positive framework which identify and guide the focus for development within the Borough.

2.2.   However whilst the broad principle of the spatial strategy could be considered sound, the introduction of specific policies (which limit height and development capacity across multiple sites and areas) creates an inflexible framework. The imposition of such rigid caps on height in locations which are highly accessible and have existing tall buildings is in direct conflict with the requirements of both the London Plan or the National Planning Policy Framework ('**NPPF**'). Those documents obligate all parties to optimise capacity and make the best use of land in order to achieve sustainable forms of development[3].

2.3.   The limitations imposed on height across various Spatial Strategy Areas, Tall Building Zones and individual site allocations is not supported by robust evidence.

2.4.   The evidence contained within the Urban Design Study 2021 ('**UDS**')[4] identifies Strategy Areas as having '*low sensitivity*'[5] and '*higher probability for change*' yet the WLP still imposes stringent upper limits on the potential scale of development (e.g. up to 10 storeys) within various site allocations. This approach fails to provide a positive framework which allows the full potential of land to be realised and as such it does not accord with the requirements of the London Plan or the NPPF.

2.5.   The spatial strategy and policies within the WLP are not consistent with the evidence base and cannot be found to be appropriately justified or sound.

2.6.   A solution would be to incorporate greater flexibility within the 'Tall Building Zones' and corresponding site allocations by increasing the provisions for maximum heights. Maximum heights can still then be made the subject of specific design and townscape analysis on a site by site basis via the application process. This would accord with the approach established by Policy D3 of the London Plan.

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[2] Which identifies 'Growth Locations'.

[3] See SIM's Hearing Statement in respect of MM1.

[4] SD-054.

[5] For example outside the London View Management Framework (LVMF) and any of the Wandsworth Local or Designated views or Views of Interest.

2.7. The intention to fix heights for individual sites (such as 7 – 10 storeys[6]) is inflexible and not based on robust evidence given the 'high level' and general analysis contained within the UDS.

2.8. The current strategy for development contained within the WLP is unnecessarily constrained. As such, it does not support or promote the realisation of the true capacity of land within the Borough and is in direct conflict with the London Plan and the NPPF.

In setting a minimum requirement of 20311 new homes for the plan period 2023 – 2038, does WLP Policy SDS1 make adequate provision to meet Wandsworth's housing needs and does the plan clearly set out a delivery trajectory that is achievable?

2.9. As set out above, the emerging spatial stagey and site allocations impose unnecessary caps or limits on development. That approach will impact the deliverability and realisation of a number of allocated sites[7] which in turn will limit the housing numbers delivered within the various Area Strategies (estimated to be a minimum of 18,342 units).

2.10. The WLP relies heavily (20% of its total minimum target – 4,848 units)[8] on windfall and small sites to deliver its required housing over the plan period. The WLP could be more effective and justified if greater flexibility was incorporated into the spatial stagey. This would create a more positive framework for land within areas already identified for more comprehensive redevelopment and higher densities to contribute more towards the strategic objectives.

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[6] See building heights for Site Allocation RIV10.

[7] See SIM's Hearing Statement in respect of MM10.

[8] See Paragraph 2.67 of the WLP.