



LONDON BOROUGH OF WANDSWORTH
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 9:
BALHAM
(POLICIES PM8 AND BA1)

TUESDAY 22 NOVEMBER 2022

Abbreviations

CAZ – Central Activities Zone

GIS – Geographical Information System

HELAA – Housing and Economic Land Availability Assessment

LP – The London Plan

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

RNA – Wandsworth Town Centre and Retail Needs Assessment

VNEB – Vauxhall, Nine Elms and Battersea

WLP – Wandsworth Local Plan

Is the area strategy and are the site allocation policies for Balham 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 (PM8) and Site Allocation (BA1) for Balham 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)

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

Balham Area Strategy is in accordance with the London Plan is defined in it as a district centre.

In the case of Balham, the Area Strategy covers the town centre, which is a focus for communities and neighbourhoods around which rely on it. It is well connected by transportation, due particularly to its location on the underground / national rail and astride a major radial route, and has a distinctiveness drawn from its compact triangular street form and secondary shopping areas. Focusing on Balham is intended to bring a range of improvements to the place which will capitalise on recent changes (such as Hildreth Street) and strengthen its role as a local centre for its catchment. Focusing development here helps to protect the specific characteristics of Balham and improve areas in need. The centre has limited opportunities for significant change in the form of allocations, but one central and highly visible site is allocated to help drive some of that positive change (Site BA1, Sainsbury’s).

Balham's one allocation within the Area Strategy is within the heart of the town centre defined by the High Road, Bedford Hill and Station Road. The capacity for Balham is derived from the HELAA, and site BA1 provides a proportion of this capacity, which is reflected in Policy SDS1. Further detail on how the site should come forward is set out within BA1, which is set within the context of other policies within the Plan (e.g. LP4, Tall Buildings).

Developing the Placemaking Policies: PM8 Balham

The Area Strategy boundary is principally based on the defined town centre boundary and the Site Allocation to ensure they capture the local context as best as possible. A buffer of 100m was then added to this in order to express the indicative nature of the area strategy boundary. The Area Strategies provide the area of focus, however development outside of the areas would need to be cognisant of and have regard to them. The linear form of Balham along the High Road is a case in point, as economic and commercial activity does extend demonstrably beyond this 100m line.

Balham 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 strategy for Balham responds to its current context and character, which is essential to understand. Any 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.

At the current time, Balham can be defined by:

- Its development from a small town with the railway;
- Balham High Street, which can be busy and as a result hard to cross;
- Its town centre focused around three roads;
- Linear links to Clapham South and Tooting;
- Recent improvements to the streetscape in Hildreth Street;
- A well-served retail centre;
- Good transport links, but with traffic and car parks dominating.

Balham is characterised by 3-4 storey Victorian and Edwardian terraces with ground floor shops and offices or residential above. Generally, frontages are positive, and contribute to the street scene, with a sense of diversity, variety and colour. There is a sense of individuality to buildings with a coherent overall unity.

The sense of place is greatly enhanced by positive historic interest, which include corner pubs, villas and religious buildings.

There is a high incidence of post-war infill development, some of which is unsympathetic to the period character and proportions. The area also suffers from a lack of street trees, which perceptually add to the feeling of noise and pollution.

Bearing in mind this character and context, and fitting into the framework established by strategic policy, the Local Plan sets out a distinct and bespoke vision for the Area Strategy which can be summarised as:

- Restoring the town centre's character;
- Providing an inclusive and connected public realm/open space;
- Supporting measures to reduce the dominance of cars;
- Supporting appropriate development at key gateways.

Whilst Balham is only identified as a district centre in the London Plan, it is a significant centre in the context of Wandsworth with a wide appeal in the east of the borough and across the border into Lambeth. In this respect alone, the Council considers Balham to be worthy of treatment through an Area Strategy, but in addition 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.

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.

Within the Placemaking policy, PM8, the understanding of the place combined with analysis and general direction has given rise to a specific policy response geared towards its future success, couched in the needs of the borough. The main issues arising in PM8 are:

- Stronger definition / gateways for the town centre;
- Supporting / protecting town centre economic activity;
- Improvement of shopfronts;
- Planting (esp. street trees) and street furniture;
- Maintenance and addition of public realm and open space;
- Cultural uses and use of meanwhile spaces;
- Improvement of pedestrian and cycling environment;
- Improvement for servicing of businesses (loading).

In this respect, the key evidence in shaping Balham's Area Strategy has been in the Retail Needs Assessment (RNA), and the Urban Design Study.

The RNA acknowledges the linear nature of the centre, and the way in which secondary activity stretches along the High Road. It considers the role of commercial activity, particularly beyond the railway line to the south, considering a possible extension of the town centre boundary, but pulling back from recommending this on account of the lack of a clear need to do so in light of the broader findings in respect of retail need. The RNA recommends no change to the boundary to the north, where similar linear development exists. The centre has a clear core where the larger units exist, but a lower proportion of what were A1 uses. The RNA recommends a flexible approach to uses on the edges of the defined centre owing to a high vacancy rate.

The Urban Design Study notes its lower rise and suburban feel, though located on a wide and busy radial route. It comments on the town centre as a centre for commercial and leisure activity, and how this activity would have been more prominent along the High Road between Tooting and Clapham South if not for the damage sustained during the wars. It draws on the historic character, scale and prominent landmark buildings along with the distinctive and calmer nature of Hildreth Street as positive features, but highlights the trafficked environment, lack of street trees and lack of distinct gateways as detractors overall. It notes the dominance of car parks as a weakness, and highlights the potential at the Sainsbury's store for a change which could accommodate a feature building which would bring benefits to the centre overall and can address a number of negative attributes.

The Spatial Area Map at 10.1 highlights the importance of the main route and function of Balham High Road as well as the cluster of uses around Bedford Hill, Balham Station Road, and Balham High Road.

The Area Strategy attracted several comments, primarily aimed at the Sainbury's allocation, but also around the probability of the Crossrail scheme and the strength of the Hildreth Street market. In respect of the allocation, responses were concerned about the loss of open space and trees, of the loss of parking and the size and mass of any proposed development. The site has been justified on the basis of the benefits it can bring, its suitability and the borough's overall housing need. Proposed modifications are relatively minor.

Does the housing land site allocation in Balham show how it 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) ¹(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 44 together with the 28 capacity of other non-allocated sites make up the total housing capacity for Balham 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.

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 3 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

¹ 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.

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 NPPG 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 Balham 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.