



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

**MAIN MATTER 10:**  
**WANDSWORTH RIVERSIDE**  
**(POLICIES PM9, RIV1 - RIV11)**

**TUESDAY 22 NOVEMBER 2022**

**Abbreviations**

HELAA - Housing and Economic Land Availability Assessment

GIS – Geographical Information System

LP – The London Plan

LRYYRFP - Lombard Road York Road Riverside Focal Point

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

SHLAA – Strategic Housing Land Availability Assessment

SPD - Supplementary Planning Document

UDS – Urban Design Study

VNEB - Vauxhall Nine Elms Battersea

WLP – Wandsworth Local Plan

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

The Area 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 (PM10) and site allocation policies (RIV1-RIV11) for the Wandsworth Riverside Area are justified by appropriate available evidence, having regard to national guidance, local context, and they are in ‘general conformity’ with the LP. The Overarching Area Strategies provide thematic guidance for a larger area which encompasses and overlaps with Spatial Areas ensuring a geographic coherency across important areas of the borough such as the riverside and the Wandle Valley.

The primary sources of evidence are as follows:

- [Cultural Planning Guidance Lombard Road / York Road Riverside Focal Point Area](#) (SD-071);
- [Lombard Road / York Road Riverside Focal Point SPD](#) (SD-078);
- [Battersea Park Management and Maintenance Plan](#) (SD-090).

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

The Wandsworth Riverside Overarching Area Strategy is in accordance with the London Plan.

*Introduction*

In the case of the Wandsworth Riverside, the Overarching Area Strategy sets out the overall vision for how the Riverside can improve over the next 10-15 years to become a high-quality destination with better connected, new and enhanced public space benefitting the borough and its Thames setting, and supporting future growth. The Area Strategy makes the case for a joined-up approach to future activities on and around the Thames to make the most of the heritage and cultural resources that already exist, to stimulate further enhancements to the

riverside's particular qualities, and to better connect it to the borough's existing and emerging town centres. The area intersects with several of the other Area Strategies including Putney, Wandsworth Town, Clapham Junction and York Road / Winstanley Regeneration Area, and Nine Elms. The vision and policies set out within those strategies work in tandem with the Area Strategy for Wandsworth's Riverside.

The Riverside has eleven allocations made within the Area Strategy, with several others from the Putney, Wandsworth Town, Clapham Junction and Winstanley/ York Road, and Nine Elms Spatial Areas overlapping with the Riverside Spatial Area. The eleven sites specifically in the Riverside Spatial Area have been assessed through the HELAA process to provide an overall housing capacity of 1,098 dwellings, which is reflected in Policy SDS1. Where a site allocation falls within both an Area Strategy and an Overarching Area Strategy, the capacity is only recorded in the former. Further detail on how each site should come forward is set out within RIV1 – RIV11, and these are set within the context of other policies within the Plan (e.g. LP4, Tall Buildings).

The Area Strategy boundary is principally based on the town centre boundaries and relevant site designations to ensure they capture the local context as best as possible. A buffer of 100m is added to this in order to express the indicative nature of the Overarching Area Strategy boundary.

For the Wandsworth Riverside the spatial areas of Putney, Wandsworth Town, Clapham Junction and the Winstanley Estate/ York Road Regeneration area, and Nine Elms were partially but not entirely included within the boundaries. This was done to ensure that the area encompasses the areas in close proximity and with a connection to the riverside so that the guidance would be thematically and geographically sound.

*The Area Strategy for the Wandsworth Riverside: 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 the Wandsworth Riverside 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, the Wandsworth Riverside Area can be defined by:

- Focal Points of Activity;
- A grouping of nationally and internationally significant cultural institutions;

- Existing industrial facilities;
- Safeguarded Wharves;
- The Thames Tideway Tunnel and its associated sites on land;
- The extended Sport Opportunity Area around Putney;
- The Thames acts as the backbone of the green chain network which spreads out through Wandsworth and adjoining boroughs; and
- The Thames Path.

The Area Strategy encompasses the entirety of Wandsworth's Riverside. Reflecting the geographic extent of the area, its character is varied: it encompasses the human-scale frontages and boathouses in Putney; large-scale modern residential development and industrial buildings in Wandsworth Town and; the outstanding landscape interest of Battersea Park, an area undergoing a significant change and evolution in Nine Elms.

Putney Riverside is defined by the distinct sweeping bend of the River Thames. The area is punctuated by Leader's Gardens which, together with mature trees along a substantial portion of the riverside, create a green setting characterised by busy public spaces with leisure users on the river.

Downstream of Putney Bridge, the Deodar Road Conservation Area creates a green frontage formed by private gardens to Victorian houses backing onto the Thames. This provides a distinct suburban feel immediately behind the busy Putney High Street, with the special interest created by the houses' relationship to the river. The riverside north of Wandsworth Town is characterised by a mixture of tall residential buildings and remaining industrial sites. The area benefits from the openness of the River Thames, local boat traffic, and the interest of the piers and moorings.

Further to the east is Battersea Riverside. It is generally characterised by a coarse urban grain with limited tree cover and large-scale buildings, as well as trading estates and car dealerships on Lombard/York Road. There are few leisure or entertainment destinations, and much of the area feels 'private'. This, together with the lack of functional public realm and open space, contributes to the relative absence of activity or vibrancy along much part of this riverside.

Further to the east is Albert Bridge. Its historic landscape is based on the formal and informal compositions within the park, its tree-lined carriageway drives, embankment promenade, lakeside settings, the views within and from the park and its relationship to the River Thames. At the eastern end of the Battersea Park is Chelsea Bridge. It provides views

towards Battersea Power Station, where the striking silhouette of the four chimneys against the skyline gives significance to the setting of the building.

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 centre (and for the Area Strategy) which includes but is not limited to:

- shaping the riverside’s evolution, raising its quality to become a thriving area of remarkable public space;
- creating a coherent network of links that prioritises pedestrian movement along the river, introduces space for cycling, and connects the river with adjacent town centres and wider walking and cycling routes. This will ensure that movement to, from and along the riverside becomes an uplifting experience that is accessible to all;
- promoting 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;
- supporting river-related activity including for sport, leisure, business and transport uses.

Within the Placemaking policy, PM9, this analysis and 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 PM9 are:

- Enhancement and conservation of Putney Riverside's strong character;
- Having regard to the All London Green Grid;
- Support for the Thames Tideway Tunnel;
- Promote residential-led development in the Focal Points of Activity;
- Support sports use of the riverside
- Creating a continuous, connected and legible Thames Path route.

In this respect, the key evidence in shaping the Wandsworth Riverside Overarching Area Strategy is Cultural Planning Guidance Lombard Road / York Road Riverside Focal Point Area (SD-071); Lombard Road / York Road Riverside Focal Point SPD (SD-078); Battersea Park Management and Maintenance Plan (SD-090). The Riverside Area Strategy has also been shaped by the evidence from the area strategies which sit within the riverside's

overarching spatial area and can be reviewed in the respective Main Matter Statements prepared by the Council (Main Matter Statement 3 - 6).

The Lombard Road / York Road Riverside Focal Point SPD (2015) (SD-078) set out proposals for the Lombard Road / York Road Riverside area to become a focal point of activity for the purposes of the existing Local Plan. The designation of the area as a focal point of activity is based on the clearly defined benefits in terms of regeneration, townscape and the public realm that would be achievable as a direct consequence of co-ordinating development across a number of sites. This guidance has been beneficial for the existing Local Plan and has helped inform the draft Local Plan's site allocation and area strategies.

The Cultural Planning Guidance Lombard Road / York Road Riverside Focal Point Area (2018)(SD-071) builds off the Lombard Road / York Road Riverside Focal Point SPD and provides guidance to help developers understand the ways in which arts, culture and the promotion of creative enterprise can enhance the quality of development in the Lombard Road York Road Riverside Focal Point (LRYRRFP) area. The document sets out specific aims including:

- To signpost how local plan policy applies to culture and creative enterprise in the Focal Point Area;
- To outline Wandsworth Council's vision for the use of arts and culture to enhance the quality of development in the Focal Point Area;
- To explain the process for implementing the council's policy on developer obligations for arts and culture in the Focal Point Area.

Finally, the Battersea Park Management and Maintenance Plan (2015) (SD-090) provides guidance as to how Battersea Park can be managed to achieve the vision of it retaining its identity as one of Europe's premier parks.

The Spatial Area Map at 11.1 shows how the different considerations are brought together, with the River Thames acting the spine which the overarching spatial area is connected to. The allocated sites each connect to or are in close enough proximity to have their character partially defined by the River. The map highlights the existing connections along the waterfront as well as the variety of connections there are between the river and the main settlements in Wandsworth.

The Wandsworth Riverside Overarching Spatial Area received no representations of significance during the Regulation 19 consultation.

**Are the housing land site allocations in Wandsworth Riverside deliverable and do they 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>1</sup>(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 595 together with the 504 capacity of other non-allocated sites make up the total housing capacity for Wandsworth Riverside 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

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<sup>1</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.



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 Wandsworth Riverside 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.