



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

MAIN MATTER 11:
WANDLE VALLEY
(POLICIES PM10 AND WV1)

TUESDAY 22 NOVEMBER 2022

Abbreviations

ELPS – Employment Land and Premises Study

EUIA – Economic Use Intensification Area

EUPA - Economic Use Protection Areas

GIS – Geographic Information System

HELAA – Housing and Economic Land Availability Assessment

LP – The London Plan

LSIA – Locally Significant Industrial Areas

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

SIL – Strategic Industrial Location

UDS – Urban Design Study

WLP – Wandsworth Local Plan

Is the area strategy and are the site allocation policies for Wandle Valley 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 (PM10) and Site Allocation (WV1) for Wandle Valley 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:

- [Employment Land and Premises Study](#) (SD-034)
- [Urban Design Study](#) (SD-054)
- [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.

The Wandle Valley Overarching Area Strategy is in accordance with the London Plan.

Introduction

The Wandle Valley is a strategically important corridor for the borough, and in terms of the London Plan it links the River Thames, through the major town centre at Wandsworth Town, with the Strategic Industrial Land at Summerstown via the river corridor. King George’s Recreation Park, which stretches from the edge of Wandsworth Town to Earlsfield constitutes a stretch of Metropolitan Open Land which is an important setting for the river as well as being an important recreational asset for the community and part of the Wandle Trail. More broadly, the London Plan sees the Wandle Valley as a strategic location for south London with further protected industrial sites further south in Merton and Sutton.

In the Local Plan, Policy SDS1 includes a housing capacity estimate figure of 619 for the Wandle Valley, and also seeks to provide for employment needs through the protection of key sites at criterion E. 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 Area Strategy boundary.

In the case of the Wandle Valley, this rich and diverse area covers the Wandle Delta and Wandsworth town centre (where it overlaps with the Wandsworth Town Area Strategy – see Main Matter 3 for more), and land between Merton Road to the west and Garratt Lane to the east (as far as they exist within the borough) including Earlsfield town centre, a number of employment designations¹ and the Traveller site at Trewint Street. The consistent spine to this is the river itself, which is visible for much of its length along trails, and from bridge crossings, though not always with a strong presence. One Site Allocation is made in the area, at Bendon Valley.

Whilst the Area Strategies provide focus, development outside of the areas would need to be cognisant of, and have regard to, them. The strategy also recognises the role of green spaces and views to the east of Earlsfield, where a number of large open spaces provide further context and character for the Wandle corridor. The proximity of Southfields local centre is also recognised.

Policy PM1 provides an overarching guide to development and also points to any specific supplementary guidance. In this case, there is a detailed Management and Maintenance Plan for King George’s Park (SD-091) which has been prepared to guide the conservation and stewardship of the park.

The Wandle Valley has an allocation at Bendon Valley which has a capacity derived from the HELAA. Further detail on how the site should come forward is set out within the individual allocation WV1, which is also set within the context of other policies within the Plan.

Wandle Valley 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 Wandle Valley responds to its current context and character.

At the current time, the Valley can be defined by:

- Its role as part of wider Wandle running from Croydon to the River Thames;

¹ Employment designations in this area are significant, with the SIL supported by a number of Locally Significant Industrial Areas, Economic Use Protection Areas and Economic Use Intensification Areas. This clustering can bring benefits for all businesses in a number of ways.

- Its unique historic industrial and cultural heritage;
- The presence of a large proportion of protected industrial capacity, including SIL, EUIA and LSIA;
- Good access to the Transport for London road network (TLRN);
- The importance of the ecological resource at River Wandle;
- The challenge to balance the ecological with industrial demands;
- Integration with the Area Strategy at Wandsworth Town;
- The Wandle Trail missing link, beneath the railway bridge at Earlsfield.

The character of the area is defined by the course of the River Wandle and its valley, comprising open space and industrial uses. The former includes Garratt and King George's Parks, both of which form part of the wider Wandle Valley Regional Park.

The Wandle Trail runs alongside the river, shedding light on the biodiversity value of Wandle Valley, part of which is designated as a Site of Importance for Nature Conservation (SINC).

The area has a number of detractors, in particular the over-dominant presence of industrial units or parking back onto the river and the hard, grey character of the industrial areas.

Built form with heights at around 1 to 4 storeys on the periphery of the green spaces is prominent, consisting primarily of large-scale industrial units, education and retail units, transitioning to residential towers in Wandsworth Town Centre.

The Vision for the Wandle Valley, based upon this assessment of character and context and balancing the needs and requirements of the various designations and considerations across the area, is:

- Balancing the demands for formal and informal recreation with the need to conserve features of nature conservation and cultural heritage importance;
- Enhancing the green space network, creating a place, rich in heritage, where people are proud to live, work and play;
- Maximising opportunities for healthy living by improving access and quantity of good quality public realm and greenspace;
- Enhancing the local economy by using the environment to encourage employment, training, apprenticeships and enterprise;
- Protecting the strategic reservoir of industrial land and premises within the area, while creating opportunities to intensify and modernise this provision.

The Wandle Valley is a valuable asset for Wandsworth, which provides both an important environmental and ecological resource, as well as accommodating much of the borough's strategic industrial land, which caters for a wide range of economic activity – from storage and distribution to rehearsal spaces. There are opportunities for targeted intervention that can realise greater environmental benefits, while retaining and supporting the area's economic role, building enduring social capital and resilience for its growing communities.

Within the Placemaking policy, PM10, the understanding of the place combined with the analysis has given rise to a specific policy approach geared towards achieving the vision, couched in the wider needs of the borough. The main issues arising in PM10 are:

- Targeted growth without reducing open spaces;
- New development that respects scale of river and offers public access;
- Stronger sense of place for park;
- Protection of industrial land;
- Intensification of industrial use, capitalising on underutilised land;
- Reduce water run-off;
- Improve pedestrian and cycling access;
- Improve connectivity / reduce barriers to access;
- Enhance the Wandle Trail;
- Support landscaping and planting;
- Accord with the park management plan.

To this end, the key evidence specific to the Wandle Valley has been the Employment Land and Premises Study (SD-034), the King George's Park Management and Maintenance Plan (SD-088) and the Urban Design Study (SD-054).

The ELPS recognises the Wandle Valley cluster of employment and industrial sites and recognises its role in the overall supply of such land for Wandsworth. It concludes that, 'most clusters surveyed are functioning well, have high occupancy rates and support a diverse range of business types'. It concludes that there is scope for land to be developed within the cluster, namely:

- Bendon Valley, which could be intensified to provide additional office and industrial floorspace primarily due to poor quality buildings and certain parcels of land which are low density (this forms allocation WV1);
- Lydden Road LSIA which could be intensified to provide additional industrial floorspace primarily due to poor quality buildings and certain parcels of land which are low density.

The King George’s Park Plan cross references the adopted Local Plan, and contains within it an extensive list of Action Points (Section 9) that will drive the improvement of the space over the short, medium and long term. It is costed with responsibilities for each point established, including those actions for planning policy (e.g. point C.1, using statutory legislation to protect the site and its components).

The Urban Design Study recognises the Wandle Valley as a character area in its own right, nestled between Earlsfield and Southfields, and born out of the use of the river historically as a source of water and power. It recognises the role that industry has played in the area, mixing both industrial uses and buildings with the homes of workers (the area was also associated with Travellers). The UDS notes the weak presence of the river, but also the expansive views that exist. The recreational value, the openness and the biodiversity are all set out as valued features set against the less favourable elements which include the hard industrial edges, isolated space and under-utilised riverside. It sets out a strategy to improve the area, particularly through green interventions, improved access to the river and better connections. It calls on new development to create a greater sense of place.

Through the Duty to Co-operate, Merton and Wandsworth have been working to ensure a resolution across the boundary to the ‘missing link’ on the Wandle Trail. This discussion is set out in the [Statement of Common Ground](#) (WBC-005) with neighbouring authorities.

The Spatial Area Map at 12.1 demonstrates how the different strands of the Area Strategy come together along the strong corridor defined by the river and the adjacent roads. The connections between the corridor and the surrounding context is clear, with links east-west from surrounding areas enabled by green links across the river and views and vistas contributing to this urban structure. The corridor is bookended by the Wandle Delta and the Summerstown employment area, and linked through allocations and designations that are primed to respond to the needs of the strategy.

The Wandle Valley’s Area Strategy received few representations overall during the Regulation 19 consultation.

Does the housing land site allocation in Wandle Valley 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) ²(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 402 together with the 217 capacity of other non-allocated sites make up the total housing capacity for Wandle Valley 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 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

² 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.

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 Wandle Valley 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.