



LONDON BOROUGH OF WANDSWORTH

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

MAIN MATTER 18:

ENSURING THE VITALITY, VIBRANCY AND UNIQUENESS

OF THE BOROUGH’S CENTRES

(POLICIES LP41 - LP48)

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Abbreviations

CAZ – Central Activities Zone

GLA – Greater London Authority

ILP – Important Local Parade

LP – The London Plan

NPPG – National Planning Practice Guidance

NPPF – National Planning Policy Framework

NTS – Night Time Strategy

OA – Opportunity Area (OAPF – Opportunity Area Planning Framework)

RNA - Wandsworth Town Centre and Retail Needs Assessment Final Report

WLP – Wandsworth Local Plan

VNEB – Vauxhall Nine Elms Battersea

Are the requirements of the Borough’s Centres policies justified by appropriate available evidence, having regard to national guidance, local context, and the London Plan?

The requirements of the policies in Chapter 19 ‘Ensuring the Vitality, Vibrancy and Uniqueness of the Borough’s Centres’ 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:

- [Wandsworth’s Retail Needs Assessment 2020](#) (SD-041)
- [Town Centre Monitoring Report 2021](#) (SD-042)

Chapter 19 ‘Ensuring the Vitality, Vibrancy and Uniqueness of the Borough’s Centres’ sets out policies for the management, growth and adaptation of the borough’s centres to ensure that the vitality, vibrancy and uniqueness of each is maintained and strengthened, and that they collectively form an effective and resilient network which meets the needs of the borough’s residents and visitors, both now and in the future.

The NPPF at paragraph 86(a) requires Local Plans to define a network and hierarchy of town centres, and to promote their long-term vitality and viability. It is important to identify the network of centres and define their extent on the proposals map in order to show which commercial areas will be protected and enhanced and where development/investment will be concentration (i.e. the sequential approach).

In Wandsworth, this is a well-established approach, with a hierarchy of centres providing shopping and complementary facilities that is divided into Town Centres, Local Centres, and Important Local Parades (ILPs), as well as the potential Central Activities Zone (CAZ) retail cluster at Battersea Power Station within the VNEB OA, as designated in the London Plan. The latter is already being developed, and the Council considers this to be ‘emerging’ – rather than ‘potential’ – but retains the language of the London Plan in the Local Plan for consistency with that document (see London Plan, Annex 1, Town Centre Network). In terms of scale, a CAZ retail cluster is considered to be broadly comparable to the GLA’s designations of Major or District Centres outside of the CAZ. The hierarchy of centres was reviewed in detail in the RNA and is set out within Policy LP41 ‘Wandsworth’s Centres and Parades’, endorsed by the findings and recommendations of the RNA (paragraphs 7.21 to 7.31).

Wandsworth does not have one single strategic retail centre, but rather five Town Centres – Balham, Clapham Junction, Putney, Tooting, and Wandsworth Town (together with the potential CAZ retail cluster at Battersea Power Station) – each of which serves a distinct area of the borough, playing an important role providing shops, services, employment opportunities, housing, and functioning as the focus for community and cultural life. The spatial strategy for the location of development reflects this, and – in line the national policy's 'town centre first' approach – the main centres and the potential CAZ retail cluster at Battersea Power Station are identified as the focus for large-scale shopping and major trip-generating development. The centres are all highly accessible by public transportation and are recognised within the London Plan's Town Centre Network. Accommodating main town centre uses in locations where customers are able to undertake linked trips contributes to sustainability objectives by reducing the need to travel, as well as providing for improved customer choice and competition. In this way, the benefits of new development will serve to reinforce the vitality and viability of the existing centre. The inclusion of large-scale community facilities within town centres can realise benefits including enhancing social cohesion, creating vibrancy and reinforcing the importance of the centres.

Local Centres provide a focus for local communities, providing a range of facilities for food and household goods shopping as well as service and other employment, leisure and recreational functions. They are generally well served by public transportation (with the exception of Roehampton). The variation in size, role and character of individual centres reflects the catchment population – some may provide a wide range of shops whilst others may have a more limited offer. There is scope for residential-led development in some of these centres, in particular Roehampton, which is discussed in more detail in the Area Strategy for Roehampton and Alton Estate Regeneration Area (Main Matter 8).

Important Local Parades (ILPs) comprise a small grouping of shops within one or two parades, often including a newsagent, general grocery store, post office, and occasionally a pharmacy, hairdresser or other small shops of a local nature. These parades serve immediate local needs only, providing convenience goods within walking distance of people's homes. There is some variation in their size, vacancy rates and shopping function, however, and certain parades have a significant evening economy. The importance of maintaining local centres and parades to provide day to day shops and services within walking distance across the Borough was highlighted in the RNA, Appendix 3.

In accordance with NPPF paragraph 86(b), the extent of the town centres and primary shopping areas is clearly defined on the Local Plan Policies Map (SD-010, see Map 1), with the latter also set out within Appendix 3: Designated Frontages of the Local Plan. The Local

Plan divides the primary shopping areas into Core, Secondary and Other Frontages within town centre locations, and Important Local Parades are also defined as primary shopping areas, which is set out within Policy LP42 ‘Development in Centres’ and explained in paragraphs 19.17 and 19.20 in the supporting text. Outside of the centres, ILPs function as the primary retail frontages serving a more local catchment area and are therefore also defined as primary shopping areas for the purposes of the NPPF and as key shopping areas for the purposes of the General Permitted Development Order. The uses that are appropriate in town centres are established within Part A of Policy LP42, and will include main town centre uses as defined in the NPPF Annex 2 Glossary. The policy also provides criteria which proposals must meet to ensure that the use is appropriate for the specific centre. Criterion 1, for example, requires that the development proposal is “of a scale appropriate to the size of the centre and the catchment that it serves”. This will ensure development does not change the charter of the centre and potentially harm the hierarchy of centres protected in Policy LP41. The policy outlines a spatial strategy for the location of different uses between the frontages, with uses of a retail character being encouraged to locate in Core and Secondary Frontages. As set out within paragraph 19.16 of the supporting text, whilst retail is one of several uses under the broader umbrella of Class E (Commercial, Business and Service Uses), the Plan also recognises the benefit of maintaining a concentrated retail core, and therefore retains the distinction between different frontage designations is retained to inform the preferred location for shops within ground floor units.

The approach adopted within these Policies LP41 to LP48 has been informed by the Council’s RNA which comprises an assessment of the quantitative and qualitative needs for land and floorspace for retail, food / beverage and leisure development up to 2040. This assessment indicates that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace provision over the majority of the Local Plan period (up to 2035), as the short to medium term growth is expected to be absorbed by the implementation of commitments, the repurposing or take up of existing vacant floorspace, and by increases in turnover efficiency. As such, the priority is to direct new main town centre uses to the borough’s centres. The assessment did indicate that there may be scope for new development in the long term (by 2040), including as an element of residential or economic-led mixed-use development. The RNA suggested long term projections beyond 2035 should be treated with caution and kept under review.

The Plan recognises the need for flexibility and encourages local development opportunities for both retail and other main town centre uses in individual centres where they are able to

maintain and enhance the overall health of a centre, including through the redevelopment, refurbishment or the expansion of sites. Such intensification is likely to be realised alongside residential uses, which can also play an important role in ensuring the vitality of centres.

The NPPF, at paragraph 86(d) looks to planning policies to set out a range of suitable sites in town centres to meet the scale and type of development anticipated to be required over the following decade, and to review town centre boundaries if sufficient sites are not available where site availability is identified as an issue. As set out above, the RNA does not identify a need to increase floorspace, and the fulfilment of any required growth is directed towards key centres, vacant units and existing opportunities that exist. The Area Strategies¹ describe in detail how this is expected to occur within each centre and provides for town centre uses where this appropriate within the context of the strategy; examples include WT18 and WT20 in Wandsworth Town, CJ1 and CJ2 within Clapham Junction and PUT1 and PUT5 in Putney².

The NPPF, at paragraph 86(f), encourages boroughs to recognise the role that residential uses can play in contributing to the overall health and vitality of a centre. There are opportunities within the borough’s Town Centres – particularly Wandsworth Town, Clapham Junction, and the emerging CAZ retail cluster at Battersea Power Station – to accommodate residential uses as part of large, transit-orientated development, including those identified within site allocations within the relevant Area Strategies.

In all of the borough’s centres – but particularly in Balham, Putney, and Tooting – the RNA identifies the scope for the small-scale intensification through introducing new residential units on the upper floors of existing commercial and community uses (as well as offices, for which a different approach is set out in Policy LP33 ‘Promoting and Protecting Offices’; see the Written Statement on Main Matter 17 ‘Building a Strong Economy’). The Council also recognises the growing trend to convert the rear of premises for commercial and community uses to residential use. Both types of development are supported, provided that: the new residential development meets the necessary standards; it does not lead to an unacceptable loss of commercial or community space; and that the resulting unit on the ground floor remains of a viable size for current and future occupiers.

As with all projections, there is a degree of uncertainty associated with long-term floorspace capacity forecasts (especially beyond 10 years). This is particularly pertinent given the

¹ See Matters 3 to 11.

² Also see individual Statements on the Area Strategies concerning centres (e.g. Wandsworth Town – Matter 3 / Clapham Junction – Matter 5 / Putney – Matter 6).

impact of the COVID-19 pandemic (and Government's subsequent interventions), which is not reflected in the research (published in February 2020) on which the projections are based. The long-term impacts of the pandemic (and now the cost of living crisis) are not yet fully known, and the Council will continue to monitor the impacts of this and the health of its centres and will adapt the approach if necessary.

That notwithstanding, it is clear the pandemic has severely damaged many of the borough's businesses that rely on the dense bustle of urban living, which reinforces the Council's policy position, established in this Chapter, to provide greater flexibility in the planning of town centres (a trend underway already in light of structural changes in the industry), whilst also ensuring that there is an accessible local provision of goods and services. This is essential to ensuring the long-term health and resilience of the borough's network of centres and parades.

The borough's centres and parades are the preferred location for retail, leisure and other main town centre uses. This is emphasised in the context of the relatively modest long-term growth identified within the RNA, as well as the likely damaging impact of the COVID-19 pandemic / cost of living crisis on the viability of the borough's centres. As such, proposals requiring planning permission for town centre uses that are situated outside of these locations will be required – through Policy LP43 – to pass a sequential test and (in certain instances) an impact test, which is in accordance with the NPPF and the NPPG, as well as being in general conformity with the London Plan.

The impact assessment test applies only to proposals for retail and leisure uses. The Council has outlined a local threshold of 400 sqm (gross), which is consistent with the Sunday trading threshold (280 sqm net³) as recommended in the RNA (paragraphs 7.43 to 7.48). The RNA considered the appropriate impact threshold against the six key considerations identified in the NPPG, in terms of relative scale to centres, existing vitality, viability and vulnerability of centres and the likely impact on centres. The low floorspace projections in the RNA indicate the 2,500 sqm threshold would significantly exceed the long term need for development in all parts of the Borough and the potential for adverse impacts on Wandsworth network of centres is significant.

The proposed 400sqm is a reduction from both the previous policy position, and considerably lower than the mandatory threshold that is set out in the NPPF (of 2,500 sqm gross), but is consistent with the threshold adopted in many recent development plans

³ The 280sqm also relates to the definition of shops which are now considered under Use Class F2 (Local Community Uses).

across the country. This higher threshold is not considered appropriate in Wandsworth because the relative density of the borough’s urban context means that additional retail/leisure developments under 2,500 sqm could have a significant adverse impact on centres and parades. Development over the 400 sqm threshold is likely to have a wider catchment area and will have a greater impact on vulnerable centres.

The VNEB OAPF specifies that, outside of the CAZ retail cluster at Battersea Power Station, small scale retail uses in this area could play a supporting role as part of residential-led mixed-use development. Other main town centre uses could also contribute to placemaking through the creation of active frontages. As such, units smaller than 400 sqm (gross) in these areas therefore do not require a sequential test.

Policy LP47 ‘Markets’ ensures that market pitches that are to be lost are replaced to an equal or enhanced standard. It also supports enhancement and / or expansion of existing markets subject to ensuring that basic conditions – delivery, access, residential amenity – are provided or protected. The policy also covers new ancillary retail market pitches at New Covent Garden Market.

The policy responds to the requirement set out within the NPPF, at paragraph 86(c), to retain and enhance existing markets and, where appropriate, re-introduce or create new ones, and is in general conformity with London Plan Policy E9 which looks to support London’s markets.

Whilst not referencing ‘night-time’ uses specifically, the NPPF sees town centre uses as including leisure, arts, cultural and tourism development (such as cinemas, theatres, and museums). The NPPF also indicates planning policies should support the role that town centres play by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries. The RNA identified more scope for new food/beverage uses than retail development and suggested the diversification of uses with be critical to the future vitality and viability of centres.

The Mayor has gone further, promoting London as a 24-hour global city, and has published [a 24 hour vision document](#) to support this ambition. This is facilitated through London Plan Policy HC6, which encourages boroughs to develop their own vision for the night time economy. The policy seeks to strengthen, in particular, access, inclusion and safety, the convenience of public transport and the range of night time activities. Particular emphasis is placed on the role of the CAZ and town centres in this regard. Also recognised is the

varying role of night time uses within town centres, and the London Plan classifies centres as either:

- NT1 – Areas of international or national significance (none in Wandsworth)
- NT2 – Areas of regional or sub-regional significance (Clapham Junction)
- NT3 – Areas with more than local significance (Wandsworth Town, Tooting, Putney)

Policy LP45 'Evening and Night-Time Economy' is in general conformity with the London Plan. Alongside the Council's commitment to develop a [Night-Time Strategy](#) (Policy LP45 Part A), various other aspects of Policy HC6 of the London Plan have been incorporated. These include supporting the diversification of night-time economy uses (LP45 Part A); improving access, inclusion and safety, including with respect to travel to and from the venues (LP45 Part A.2); and considering how to mitigate the potential negative impact on amenity (LP45 Part A.3).

Policy considerations relating to the public realm and the appropriate location of town centre uses (whether they form part of the night-time economy or not) are addressed elsewhere in the Local Plan, in Policies LP1 'The Design-led Approach' and LP42 'Development in Centres', respectively, and they do not need to be repeated in Policy LP45.

The Council's Night-Time Strategy has been developed on a similar timescale to the progression of this Plan, and the policy has been able to reflect the aspirations and ideas developed through its engagement stages. The development of the Council's Night-Time Strategy will address issues relating to the management of the night time economy, such as the integration of licensing and planning.

The proactive consideration of night-time activities also supports the individual Area Strategy aspirations for those centres identified as having a significant evening economy.

The five existing Town Centres in the borough – Balham, Clapham Junction, Putney, Tooting, and Wandsworth Town – as well as the emerging 'Potential Central Activities Zone (CAZ) Retail Cluster' at Battersea Power Station, and the nine Local Centres each represent and embody the vibrancy and diversity of communities that make up the borough. The centres provide a range of opportunities for the borough's residents, including employment, leisure, shopping, as well as housing, and are the focus of Wandsworth's cultural and community life – both during the day and in the evening. The policies within this chapter provide an appropriate strategy, based on proportionate and sound evidence, and which is consistent with national and regional strategy, to ensure their continued success.

LP46 (Visitor Accommodation) - Are stays exceeding 90 days justified by appropriate available evidence?

The London Plan states that it is unlawful for homes in Greater London to be used as short term holiday rented accommodation for a cumulative period of more than 90 days a year without seeking planning permission (para 4.9.3). The use of homes as visitor accommodation can have a detrimental impact on the surrounding residential amenity and on the stability of neighbourhoods, and the use of homes for accommodation also reduces the stock of available homes for living in. This is provided for by the Greater London Council (General Powers) Act 1973 (as amended under the Deregulation Act, 2015)

The Local Plan reflects this position in Policy LP25 'Protecting the Existing Housing Stock', thereby protecting the residential amenity of neighbourhoods from temporary accommodation which may impact upon their character and quality.

Policy LP46 contains a similar reference to a 90 day limit on visitor accommodation. Part F.7 seeks to ensure that hotels (C1) remain distinct from homes (C3). The 90 day reference reflects the Deregulation Act, which limits short term lets of C3 housing to 90 days to both safeguard the housing stock and to ensure that the visitor accommodation industry is not undermined. Policy LP46 relates to Use Class C1 uses; the impact on Use Class C3 uses will be assessed through the housing policies of the Plan.

Planning applications for visitor accommodation within Use Class C1 will be assessed against the requirements of Policy LP46. As the Deregulation Act 2015 already provides a limit on the length of stay beyond which planning permission will be sought then the inclusion of a reference in Policy LP46 is not justified by available evidence and relevant legislation. Where planning permission is required it will be determined in accordance with Policy LP46 and other relevant policies of the Plan.

The Council have suggested a proposed Main Modification to Policy LP46 to clarify this matter (SD-010, modification PPMM/114).

Do Policies LP41 – LP48 provide clear direction as to how a decision maker should react to a development proposal?

The Council consider that Policies LP41 to LP48 are in accordance with paragraph 16 of the NPPF, which requires that they are '*clearly written and unambiguous,*' and drafted in such a manner that it is '*evident how a decision maker should react to development proposals.*' Policies are positively worded unless local evidence suggests an alternative approach, and –

where appropriate – set out the requirements for decision makers using a criteria-based approach. The thresholds to which a policy applies are clearly set out. The justification for each policy and how it will be applied is clearly set out within the relevant supporting text.

The policies are clearly linked to the relevant environmental, social and economic objectives of the Local Plan, as set out in Chapter 2. These objectives support the achievement of the Local Plan’s vision and form the basis of its spatial strategy. The Council assessed the clarity and intent of the policies using the Planning Advisory Services Soundness Self-Assessment Checklist (SD-015), and in particular Q44 which asks, ‘Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?’

Following the public consultation on the Pre-Publication (Regulation 18) Local Plan, changes were made to policies LP41 to LP48, including to expressly address matters of clarity. The Council’s detailed responses and the outcome of the representations submitted with respect to the Local Plan are set out in the Council’s Statement of Consultation Regulation 18, Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comments (SD-004), with those specific to policies LP41 to LP48 from pages 450 to 460.

The Publication (Regulation 19) Local Plan (SD-001) has been submitted to the Secretary of State for Examination. However, the Council has reviewed the representations received and have set out detailed comments within the Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council’s Responses (WBC-007 and WBC-008). The responses identify, where considered appropriate, a small number of specific changes to the wording of policies and the supporting text for the sake of clarity. These are set out within the Schedules of Proposed Main and Additional Modifications Suggested by the Council (WBC-010 References PPMM/109 - PPMM/115 and WBC-011 Reference PPAM/087), respectively.