



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

MAIN MATTER 20:
GREEN AND BLUE INFRASTRUCTURE
(POLICIES LP53 - LP60)

TUESDAY 29 NOVEMBER 2022

Abbreviations

CIEEM - Chartered Institute of Ecology and Environmental Management

GiGL - Greenspace Information for Greater London

LERC - Local Environment Record Centre

LNR - Local Nature Reserves

LP – The London Plan

MOL - Metropolitan Open Land

NPPF – National Planning Policy Framework

OSS - Open Space Study

PPG - Planning Policy Guidance

PPS - Playing Pitch Strategy

SAC - Special Areas of Conservation

SINC - Sites of Importance for Nature Conservation

SPD - Supplementary Planning Document

SSSI - Sites of Special Scientific Interest

WESS - Wandsworth Environment and Sustainability Strategy

WLP – Wandsworth Local Plan

Are the requirements of the Green and Blue Infrastructure policies justified by appropriate available evidence, having regard to national guidance, and local context, and meeting the requirements of the London Plan?

The requirements of the policies in Chapter 21 ‘Green and Blue Infrastructure and the Natural Environment 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 Environment and Sustainability Strategy](#) and [WESS Action Plan](#) (SD-056)
- [Open Space Report](#) (SD-073)
- [Playing Pitch Strategy](#) (SD-074)
- [Green Infrastructure and Open Environments: The All London Green Grid](#) (SD-089)
- [Battersea Park Management and Maintenance Plan](#) (SD-090)
- [King George’s Park Management and Maintenance Plan](#) (SD-091)
- [South East Inshore Marine Plan](#) (SD-103)

The policies in this Chapter are justified by appropriate available evidence, has regard to national guidance, and local context, and are in general conformity with the London Plan. In particular the policies will:

- Protect and enhance open spaces and the natural environment to support people’s health and well-being and the borough’s habitat and biodiversity objectives, promoting biodiversity net gain.
- Protect and enhance the River Thames and its tributaries, recognising the multiple opportunities they provide for recreation, wildlife and river-based transport.
- Respond to the future demands created for leisure, entertainment, sport and cultural activity, all of which will contribute to developing a successful community life.

In addition, the policies reflect the fact that Wandsworth has large areas of land designated as Metropolitan Open Land (MOL). Such land is important to both the borough and to the whole of London by in particular providing attractive, visual breaks to the built-up area, through keeping land permanently open. MOL is unique to London and protects strategically important open spaces within the built environment. London Plan Policy G3 Metropolitan Open Land explains that MOL is afforded the same status and level of protection as Green

Belt and that the national planning policy tests that apply to Green Belt also apply to MOL including in relation to openness.

The Policies Map identifies the areas within the borough that are designated as MOL. This includes areas of public open space, allotments and common land, as well as private sport clubs and nursery gardens. The London Plan makes it clear that there is a presumption against development unless the proposal provides essential facilities for appropriate uses and that very special circumstances can be demonstrated. LP53 'Protection and Enhancement of Green and Blue Infrastructure' outlines how areas of open space, including Metropolitan Open Land, will be protected, enhanced and made more accessible. Each individual open space and green and blue feature, regardless of size, together form green corridors which perform a range of functions and delivering a wealth of benefits for the local population and wildlife.

NPPF paragraph 175 sets out that Local Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

LP55 Biodiversity is in accordance with paragraph 175 of the NPPF and is in general conformity with London Plan Policy G6 Biodiversity and Access to Nature. All designated sites of biodiversity importance are identified and mapped. The Council's Local Environment Record Centre (LERC) is the Greenspace Information for Greater London (GiGL) and supports the preparation and designation of site of biodiversity importance in the borough. CIEEM, a professional body for ecologists, consider LERCs generally offer the most comprehensive and current source of protected site, habitat and species data for their defined geographic area. GiGL provides access to a current evidence base relating to habitats, species, etc. from which to support site selection, de-selection or changes to boundaries and allows the borough to obtain and maintain up to date data on all land of nature conservation interest that is located within the administrative borough boundary, irrespective of land ownership. This is monitored and managed by Enable Leisure and Culture who provide the Council with full time access to qualified ecologists.

Policy LP55 sets out how the Council will respond to the hierarchy of designated sites of biodiversity importance including Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and Sites of Importance for Nature

Conservation (SINC), which also includes two subcategories of borough and local importance. The River Thames and its tributaries, Beverley Brook and the River Wandle, and railway land not included in other sites are also protected biodiversity areas in Wandsworth. A variety of smaller sites also exist but are not large enough to be mapped.

The Plan is supported by an up-to-date Open Space Study (OSS) (SD-073) the purpose of which is to recognise the role of open space provision as a resource and help support the development and implementation of policies in accordance with the NPPF. The OSS helps to inform the direction that the Plan should take in relation to the future provision of accessible, high quality, sustainable open spaces within the borough. It has supported the identification of priorities for open space provision and enhancement in order to support future planned growth and an increase in residents within the borough. The OSS supports the Local Plan Policies relating to open space and provides evidence to support the protection and enhancement of open space provision. The methodology used in the OSS is in line with best practice.

The methodology is based on that originally set out in Planning Policy Guidance 17 (PPG17) Companion Guide; Assessing Needs and Opportunities (September 2002). Whilst PPG17 has been replaced by the National Planning Policy Framework (NPPF), it is still recognised as best practice providing a sound methodology.

All open space sites (including provision for children and young people) have been identified, mapped and assessed to evaluate their quality and value. The Open Space Study (SD-073) will also be used to inform and support the Wandsworth Parks Management Strategies, including those for Wandsworth Common, Wandsworth Park, Battersea Park, King George's Park and Tooting Common (SD-090) (SD-091).

As set out in the Site Allocation Methodology Paper, sites within land designated for their environmental value were rejected in line with the second clause of NPPF paragraph 175 to ensure that development was directed to areas with the least environmental value.

Wandsworth's green and blue infrastructure, and in particular its street trees, soft landscaping, roof gardens, green/brown roofs and walls contribute to urban greening, whilst the Wandle Valley forms a strategically important green corridor which performs a range of functions and delivers a wealth of benefits for the local population and wildlife. LP53 'Protection and Enhancement of Green and Blue Infrastructure' establishes that green chains and open spaces along them will be protected, made more accessible, and, where appropriate, enhanced in accordance with opportunities identified in the relevant All London

Green Grid Area Framework (SD-089) and in line with the third clause of NPPF paragraph 175.

The Council seeks through LP53 Protection and Enhancement of Green and Blue Infrastructure to connect and enrich biodiversity through habitat improvement and protection at all scales, including priority habitats and extend access to, and maximise the recreation opportunities of, the borough's urban open spaces in line with the fourth clause of NPPF paragraph 175. Specific guidance on the use of native species and climate change is contained in the Wandsworth Open Space Study (SD-073), the Wandsworth Biodiversity Strategy, the Mayor of London's Biodiversity Strategy and the London Tree and Woodland Framework. This provides information to support the design of the green and blue infrastructure aspects of development proposals.

The Green and Blue Infrastructure policies of the Plan support the Implementation of a number of aims set out in the Wandsworth Environment and Sustainability Strategy (WESS) (SD-056) including the aim of making Wandsworth the greenest inner London borough by committing to urban greening, planting trees, encouraging biodiversity, protecting and enhancing our existing parks and open and green spaces. In addition the adopted Wandle Delta Masterplan SPD which provides specific local guidance for green and blue infrastructure enhancements for the Wandle Delta.

Paragraph 179 of the NPPF sets out that to protect and enhance biodiversity and geodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.

The Local Plan Policies Maps provides up to date information in accordance with the NPPF and has been informed by relevant parts of the evidence base including the OSS under the guidance from Enable Leisure and Culture, the Council Open Space and Parks partners. Through public consultations, the local context of Wandsworth's parks were captured and have informed how the policies map was prepared.

NPPF paragraph 98 requires that Local Plans policies enable access to a network of high-quality open spaces and opportunities for sport and physical activity. This reflects the important role that these assets play in supporting the health and well-being of local communities, and can deliver wider benefits for nature and support efforts to address climate

change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

The Plan's policies, and in particular Policy LP54 'Open Space, Sport and Recreation' seek to protect, and where possible enhance, the quality and provision of, Public Open Space, sports fields and pitches and play areas in the borough, particularly in areas identified as deficient. LP54 'Open Space, Sport and Recreation' establishes that playing pitches are not to be developed in line with the NPPF paragraph 99 criteria.

The Council Playing Pitch Strategy (PPS) (SD-074) identifies and assesses the quality of all playing pitches and sports grounds in the borough and provides a strategic plan for their maintenance and improvement and for the creation of new playing pitches. The PPS was developed in consultation with Sport England and supports the Local Plan Policies in this regard.

A Playing Pitch Strategy (SD-074) has now been prepared and has received support from Sport England and all relevant National Government Bodies for Sports in the borough. The final strategy is due to be endorsed by the Council shortly. Notwithstanding this, Policy LP54 is in accordance with the NPPF, in general conformity with the London Plan, and both the adopted and soon to be adopted strategies which provide the same guidance that playing pitches are to be protected and in areas of deficiency, greater provision is to be supplied. As such the policy approach is supported by locally based and robust evidence.

NPPF paragraph 174 requires that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan) and by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Additionally, paragraph 179 sets out that Local Plans should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

The Council recognises the importance of biodiversity, including within the context of wider ecological and green and blue infrastructure networks, and how it plays a crucial role in adapting to the effects of climate change. In the Wandsworth Environment and Sustainability Strategy (WESS) (SD-056), one of the key opportunities identified is for 'biodiversity conservation' and it identifies that climate change is a major threat to biodiversity, ecosystem services and human well-being. The WESS outlines that mitigating and adapting to the effects of climate change on living organisms and societies is increasingly at the heart of environmental management strategies. LP55 'Biodiversity' establishes how the Council will protect and, where appropriate, secure the enhancement of the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites.

LP55 'Biodiversity' sets out that Biodiversity Net Gain will be required in accordance with the requirements of the Environment Act 2021. Additionally, to ensure that development contributes to enhancing the natural and local environment within the context of the primarily urban character of the borough, Policy LP57 'Urban Greening Factor' requires new developments to provide additional greening features regardless of the existing amount of biodiversity on site. Together these policies will ensure that the ecological networks within the borough will be protected, expanded and enhanced. LP53 'Protection and Enhancement of Green and Blue Infrastructure' establishes that green chains and open spaces along them will be protected, made more accessible, and, where appropriate, enhanced in accordance with opportunities identified in the relevant All London Green Grid Area Framework (SD-089).

NPPF paragraph 174 establishes that planning policies should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of, for example, trees and woodland.

Trees and landscaping are key components of Wandsworth's ecological and green and blue infrastructure network. The Council will protect these trees, and other mature trees that contribute to the quality of the local environment and promote measures that protect the health and visual amenity of trees. The Council has produced a Tree Strategy (2015) that provides additional guidance for applicants where proposals will impact trees and landscaped areas. It sets out that replacement trees will be required which are of a similar species and size and planted in the immediate vicinity of the development unless agreed otherwise in the Council, with account given for site specific circumstances. While not all streets in the borough are able to sustain trees, the Council are committed to review the opportunities for planting more trees and specific opportunities have been identified within

the Area Strategies and Site Allocations where appropriate. Further opportunities exist when works are being carried out on streets.

LP56 'Tree Management and Landscaping' requires the retention and protection of existing trees and landscape features, including veteran trees. It is a criteria-based policy which sets out, for example, the approach that the Council will take in considering development proposals which would result in the loss or damage to trees or landscape. The policy is in general conformity with London Plan Policy G7 Trees and Woodlands and offer bespoke ways in which the Council can ensure the protection of trees and where replacements are required, they are specifically suitable to Wandsworth

The River Thames and River Wandle are key features and assets of the borough and fulfil important amenity, biodiversity, transport (people and cargo), leisure and recreational roles amongst other benefits. London Plan policies set out requirements for Local Plans to meet in terms of Waterways and Water Transport specially: Policy SI 14 Waterways – strategic role; Policy SI 15 Water transport; Policy SI 16 Waterways – use and enjoyment.

Policy LP58 'River Corridors' is in general conformity with the London Plan in accordance with the Marine Management Organisation's South East Marine Plan (SD-103) whilst also reflecting the local context. LP58 requires that the natural, historic and built environment of watercourses in the borough are protected and, where possible, enhanced. Policy LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses sets out the Council's expectations in relation to such proposals and the approach that the Council will adopt for proposals within the Thames Policy Area as it relates to the borough. Infrastructure currently linked to sports and physical activities on the River Thames serves an important role in open space and sports provision and is identified in the Active Wandsworth Strategy. These facilities will be protected and enhanced where appropriate. Putney Embankment's special recreational character and function, particularly in connection with river sports, together with facilities and activities which contribute to this character will be supported and protected (see the Area Strategy for Putney, Main Matter 6).

LP54 (Open Space, Sport, and Recreation) - Does the policy comply with the Framework's requirement regarding the loss of playing fields?

The Council considers that Policy LP54 Open Space, Sport and Recreation is considered sound and is in accordance with the NPPF but would benefit from further clarification. The Council has therefore suggested a proposed Main Modification as set out in WBC-010 (Reference PPMM/120).

Do policies LP53 to LP60 provide a clear direction as to how a decision maker should react to a development proposal?

The Council consider that Policies LP53 – LP60 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 threshold to which a policy applies are clearly set out. The justification for each policy and how it will 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 has assessed the clarity and intent of the policies using the Planning Advisory Service 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 LP53 – LP60, 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 LP53 – LP60 from pages 500 to 521.

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/120 - PPMM/125 and WBC-011 References PPAM/92), respectively.