



Planning Policy,  
Environment and Community Services,  
Town Hall,  
Wandsworth High Street,  
London,  
SW18 2PU

**Transport for London**  
TTL Properties Limited

Victoria Station House  
191 Victoria Street  
London  
SW1E 5ND

Date: 17/03/2023

[jessicabiggs@tfl.gov.uk](mailto:jessicabiggs@tfl.gov.uk)  
07840 857211

By email: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

Dear Sir / Madam,

## **WANDSWORTH LOCAL PLAN MAIN MODIFICATIONS AND POLICY MAP CHANGES**

Transport Trading Limited Properties Limited (TTLP) is pleased to provide its views on Wandsworth Local Plan Main Modifications and Policy Map Changes consultation. Please note that the views expressed in this letter are those of TTLP in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

### **Transport Trading Limited Properties (TTLP)**

TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways, and worksites. TfL has set up a dedicated commercial property company, Transport Trading Limited Properties (TTLP), to deliver housing and jobs in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects. TTLP has now superseded TfL Commercial Development (CD).

TfL CD/TTLP have engaged through the Local Plan preparation process and have previously submitted the following representations:

- Wandsworth Local Plan Employment and Industry Review
- Wandsworth Local Plan Issues and Options (December 2018)
- Wandsworth Call for Sites (March 2019)
- Wandsworth Local Plan Pre-Publication Regulation 18 (February 2021)
- Wandsworth Local Plan Publication Regulation 19 (February 2022)

## **Representations on Main Modifications and Policy Map Changes**

### **SDS1 : Spatial Development Strategy**

TTLP wants to reiterate that this policy does not provide as much clarity as the Local Plan Pre-publication Regulation 18 policy. In particular the policy no longer specifically prioritises the redevelopment of brownfield land, vacant and underused buildings which is where development should be supported in line with the London Plan and NPPF, particularly where these are in areas of good access.

### **Policy PM2: Wandsworth Town and Site allocation WT16 (Wandsworth Bridge Roundabout)**

TTLP remains concerned about the use of the word 'striking' in the site allocation WT16 as this is a relatively ambiguous and subjective concept. Reference to high quality design instead would be more appropriate.

TTLP welcome amended wording in MM29 for Site allocation WT16 "*the maximum appropriate height range for the site ~~must~~ should be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and should be in accordance with, the tall building maps in Appendix 2*".

### **Policy LP10: Responding to the Climate Crisis**

With regard to Part B1 and B2 TTLP previously suggested that reference to viability is included in the policy alongside technical feasibility to justify not achieving the 'Outstanding' requirement. It is noted that paragraph 15.9 acknowledges our viability point by stating that, "In exceptional circumstances where it can be demonstrated to the satisfaction of the Council that an 'Outstanding' rating is not economically viable then an 'Excellent' rating may be considered". However, TTLP maintain that this should be included in the policy as well for clarity and to ensure the policy is effective.

### **Policy LP23: Affordable Housing**

The London Plan enables public landowners to enter into a portfolio agreement with the Mayor to provide 50% affordable housing across their portfolio (Policy H4 A (4), Delivering affordable housing and Policy H5 B (2) Threshold approach to applications). TfL has such an agreement with the Mayor and we can therefore provide between 35% and 100% affordable housing on each site within our portfolio and be eligible for the Fast Track Route.

We note amended wording to LP23 Affordable Housing (MM180). "*In line with the threshold approach of London Plan Policy H5, applications not delivering the relevant minimum threshold must undergo the Viability Tested Route.*"

In Part B3 of Policy LP25 Affordable Housing of the Pre-publication Regulation 18 Local Plan there was acknowledgment of the portfolio approach for public landowners,

however, this appears to have now been removed. Part B3 should be reinstated to ensure the Local Plan is consistent with the London Plan Policies H4 and H5.

### Unallocated Sites

TTLP has previously promoted a number of sites through the Wandsworth Call for Sites consultations (please refer to our previous letter dated 11/03/2019). The following TfL landholdings remain unallocated within the latest draft Local Plan. It is considered that these sites are suitable, available, and deliverable within the plan period and so should be allocated for mixed-use development:

- 2, 2a, 2b, 2c, and 2d Tooting Bec Road, SW17 8BD
- 2,4,6 and 8 Trinity Road, SW17 7RE
- Land at East Putney Station

TTLP would like to continue to promote these sites for allocation within the Local Plan. These sites could contribute towards delivering Wandsworth's housing target and should also be included in the Council's brownfield register. We believe that our sites located along Tooting Bec Road, East Putney Station and Trinity Road Station are suitable for site allocations based upon the guidance given in the Site Allocations Methodology Paper and the Local Plan. The Site Allocations Methodology Paper stated that small sites (under 0.25 ha) were excluded unless the site *"presents a particular opportunity for intensification. Smaller sites that would particularly benefit from site-specific policy to promote investment, optimise capacity and/or secure the best development outcome were retained."*

Site allocations would support these sites coming forward. Development could optimise the capacity of these sites which are situated in sustainable locations directly adjacent to transport nodes (Tooting Bec Road, Trinity Road and East Putney Station have a PTAL rating of 6a) and are located within local centres.

### Policy Map Changes

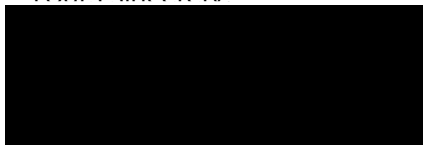
TTLP has no comment to make regarding the proposed policy map changes in this consultation as none of these impact TTLP landholdings.

### Concluding Remarks

We trust that these submissions are helpful and look forward to continuing our dialogue with the Council. If you need any further information or would like to discuss any of the issues raised in this letter and the attached table, please do not hesitate to contact me.

We would be grateful to receive confirmation that you have received our representations.

Yours sincerely



**Jessica Biggs**  
**Planning and Development Assistant**  
**TTL Properties Limited, Transport for London**

CC.

Richard Carr – TfL City Planning

Brendan Hodges / Jonathan Woolmer / Hermine Sanson – TfL TTLP