

17 March 2023

The Planning Inspectorate
C/O Banks Solutions
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For the attention of Mr Jameson Bridgewater and Mr Graham Wyatt

Dear Sirs

Consultation on the Wandsworth Local Plan Main Modifications and Policy Map Changes

We have reviewed the list of proposed Main Modifications and Policy Map Changes that you are proposing following Wandsworth Local Plan consultation.

General comment on the modifications

In general, we agree with all changes that make the policies more precise and remove ambiguity. On the contrary, we think that all policies subject to flexibility means that developers will systematically contest the policy and propose schemes in margin of the policies and guidelines.

However impressive the planning documents may be, they are of little value if planning policy and guidance can be circumvented when they seem to contravene the applicants' projects.

To illustrate the danger of loose policies, we can cite the proposal for a 17-storey tower in York Road (eventually approved) where the applicant wrote, as a justification for their scheme:

"The site-specific allocation for the site confirms that "tall buildings in this location are likely to be inappropriate" and that "the height at which a development in this location will be considered to be tall is 9 storeys." It does not go as far as advising that the site would not be suitable for tall buildings".

The proposal was approved, making a mockery of the policy stating that more than 9 storeys could be inappropriate, and causing outrage from the local community.

Even more concerning is that when planning policies become meaningless, it greatly diminishes the trust of local residents in their planning authority.

In the past, examinations have tried to tighten up some loose policies that were, in fact, brushed aside either by applicants or planning officers during the application process. In 2015, the inspector said:

“Without a policy to expressly state that site allocations will be [granted for proposals that follow the relevant design principles and that have regard to the other criteria] the documents as a whole are ineffective.”

In the following section we have commented on some of the Proposed Main Modification that are relevant to our local expertise.

Comments on some Proposed Main Modification

Main Modification Number	Comment
MM3	Comments – It removes ambiguity on the weight given to the different areas.
MM4	<p>Object – The 10 years housing target (2019/20 -2028/29) stated in the London Plan is 19,500 for Wandsworth. However, the revised figures, based on projections provide a provision of 24,792 by the end of 2028 in total, which exceed by nearly 30% the London Plan.</p> <p>We also question the accuracy of the figures in the London Plan, as they are based on data from 2018 and do not take into account the impact of the COVID-19 pandemic and Brexit.</p> <p>According to a report by PwC¹, London's population is set to decline for the first time in 30 years, driven by the economic fallout from the pandemic, people reassessing where they live, and Brexit. Net migration of EU citizens to the UK fell to 50,000 people in 2019 and could turn negative in 2021.</p> <p>A survey by the London Assembly² in August 2020 found that 4.5% of Londoners (416,000 people) were very likely to move out of the city within the next 12 months. One in seven Londoners (14%) wanted to leave the city due to the pandemic, and a third (33%) wanted to move to a new home.</p> <p>These trends are likely to be particularly notable in Wandsworth, which had 20-30% of EU migrants according to a report by PwC in partnership with ONS in 2017³.</p> <p>Therefore, we believe that the pre-pandemic and pre-Brexit Wandsworth Population Projections (GLA 2018-Based Housing-Led) are outdated and invalid. The Census 2021 will likely give more accurate results, but a Local Plan providing guidance for the next 15 years cannot be based on old and</p>

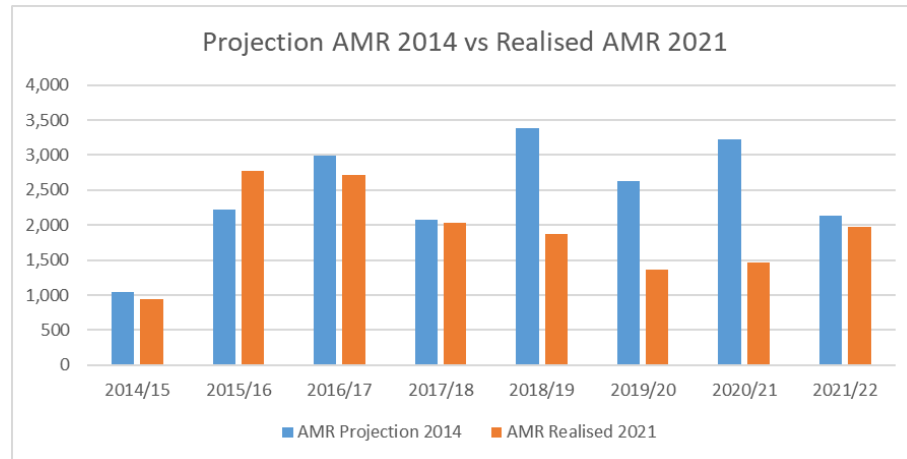
¹ PwC - January 2021 Economic Outlook paper

² <https://www.london.gov.uk/press-releases/assembly/escaping-the-city-post-covid>

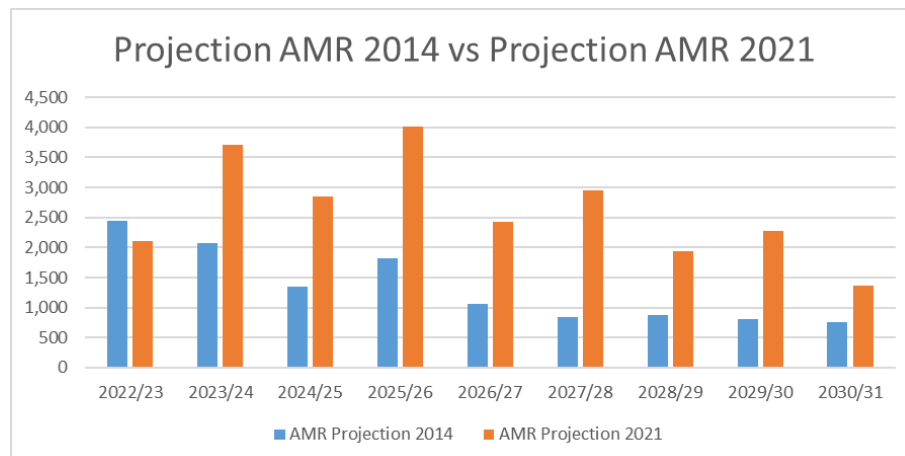
³ PwC - Facing Facts: The impact of migrants on London, its workforce and its economy March 2017

inaccurate data.

Moreover, the housing targets provided by Wandsworth in the past have not been met. Analysis of the AMR reports from 2014/15 to 2021/22 shows a discrepancy of more than 20% between projections and realizations.



And it is even more striking when you compare the prediction of the AMR report 2014/15 with the predictions of the latest AMR report 2021/22, and see a difference of more than 97%!



In 8 years, you have nearly a 100% difference in between predictions. What does it worth for predictions for the next 10 years?

This highlights the uncertainty of future predictions, and inflating the figures in the Local Plan puts pressure on the local authority to favour developers over planning policies.

We recommend that the Wandsworth Local Plan should only adhere to the targets specified in the London Plan, and that projections should be conservative due to the current uncertainties in the housing market. The Homebuilders Federation's desire for aggressive figures to facilitate justification for future developments should not come at the expense of planning policies and the needs of local residents.

MM84 MM86 MM88 MM90	+ + +	Object – Instead of “the” it should be “a”, as there is no definition of what the Urban Masterplan will be for Clapham Junction to read: '6.21 ...The site provides the opportunity to deliver comprehensive redevelopment and should be considered as part of the <u>a future</u> Urban Heart Masterplan.'
MM84 MM85 MM87 MM91 MM95 MM96	+ + + + +	Comment – Replacing <i>must</i> by <i>should</i> is aligning with the wording of policy LP4 D indeed. But the problem here is not that wording to be changed, but the wording of LP4 D that should be changed . The current wording makes the policy rules LP4 open to be dismissed at will to approve applications in breach of the spirit of the policy. LP4 D should say: “Proposals for tall buildings should <u>must</u> not exceed the appropriate height range identified for each of the tall building zones”
MM92		Support – It is indeed uncertain whether the Masterplan will be progressed in its current form. Especially as the party controlling the Council has changed in the last local election and priorities might be different.
MM93		Comment – The wording needs to be more precise and it should read: “ <i>Conditions imposed on development may need to <u>must</u> improve York Road ”</i>
MM146		Objection – The wording undermines the integrity of the tall building policy making it as an aspiration from the Council instead of a proper directive. It should be kept as originally written.
MM229		Support – It is important to consider the cumulative impact, which is ignored/dismissed as non-significant in the vast majority of the proposals.
MM232		Object – LP46.D should be kept. Removing it would create inconsistency with LP46.A as it means that existing visitor accommodation will be supported everywhere.
MM234		Object – It introduces a lack of clarity on the definition of “short stay”. Therefore, the 90 days period should be kept.

Conclusion

We would like to conclude by expressing our concern about the attitude of Wandsworth planning officers during the consultation phase.

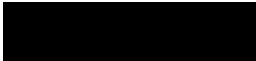
Although they fulfilled their statutory duties, they were hesitant to provide any assistance during the process, such as longer consultation periods and communicated misleading information about the kind of contributions sent to the inspectors.⁴

⁴ See Official complaint about the Local Plan Consultation organised by Wandsworth Borough Council made by the Putney Society, the Wandsworth Society and the Clapham Junction Action Group – Letter dated 21 December 2022

As demonstrated in our response, we are willing to participate in consultations when properly informed. We also anticipate that the Putney Society and the Wandsworth Society will submit comments.

We hope that our contribution will be taken into consideration, and we would appreciate a mention in your report regarding the management of the consultations for this Local Plan. This could help provide guidelines to the Council for future consultations.

Best regards



Clapham Junction Action Group

Community Group

Web: <http://cjag.org>

