

# WANDSWORTH

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## Issues Document Consultation Statement

Local Plan Regulation 18 Consultation Version  
November 2020





# Local Plan Issues Document Consultation Statement – November 2020

## 1 Introduction

The Statement of Consultation provides a summary of the responses received as part of the consultation on the Local Plan Issues document held between December 2018 to February 2019 and provides a summary response. This statement also contains details of the other consultation undertaken to inform the preparation of the of the Regulation 18 Version of the Local Plan which is subject to consultation on the 4<sup>th</sup> January 2021.

Wandsworth's Adopted Local Plan sets out policies and site allocations that will guide development in the borough over the next 15 years. Once adopted, the new Local Plan will replace the existing policies and site allocations within the Core Strategy (CS) and Development Management Plan (DMP), once adopted.

## 2 Consultation Statement

The following steps have been taken to ensure the public have been given adequate opportunity to provide comments and have these incorporated into the Local Plan.

### Issues Document

In December 2018, the Council produced the Local Plan Review – Issues document, which set out the high-level issues that the Council has identified following a review of the existing Local Plan and National and Regional policy. The Council held a public consultation on this document from December 2018 to February 2019. The results of this consultation are summarised below with responses from the Council explaining how the comments were applied to the Regulation 18 version of the Plan.

### Integrated Impact Assessment Scoping Report consultation

The Council produced an Integrated Impact Assessment Scoping Report (2016), prepared by CAG Consultants, to support the full review for the Wandsworth Local Plan. The Council reviewed the 2016 Scoping Report to ensure that the evidence base and objectives are up to date and take

account of any new evidence that has come forward since the preparation of the 2016 report. This document was consulted upon alongside the Issues Document in December 2018.

#### Consultation event

On 17 January 2020, a public engagement event was organised to discuss policy topics including tall buildings, open space, building regulations, office development, retail and town centres, and housing.

The workshop discussion identified a number of key issues that it was felt the new Local Plan should address as follows:

- A need to provide a clear focus for the borough's town centres and main spatial areas to enable the enhancement of the public realm; to encourage a variety of shops and services; and to promote a positive range of experiences for visitors including dining and enhancement of the night time economy.
- A need to recognise the valuable role that industrial land in the borough plays and the need to maintain a sufficient supply of land to provide for a range of employment options. In addition, the need for the provision of flexible affordable workspace was identified including for a variety of space types and locations with more scope for the provision of workspaces in town centres and the high street, with mixed-use developments favoured.
- That affordable community facilities and social infrastructure should be well designed and provide for multifunctional spaces and be provided throughout the borough as part of new development.
- That ambitious climate change mitigation and adaptation policies should be prioritised, and sustainable green infrastructure should be integrated into development. Green and open spaces should be protected and increased in new development to support health and wellbeing objectives.
- The need to give careful consideration to design, character, landscape, public realm, green space, wind levels and accessibility when planning for tall buildings.

#### Further Council Consultation

Throughout the preparation of the Local Plan Regulation 18 version multiple formal meetings were held with different stakeholder groups and other departments within the Council. The following sections summarise the findings from those meetings.

- Wandsworth Councillors

The Planning Policy Team met with Wandsworth Councillors on multiple occasions to discuss the progress and focus of the Local Plan.

Other groups and organisations to feed into the production of the Local Plan, these included:

- The Clapham Junction Town Centre Partnership

On 17 July 2018, the Policy Team met with the Clapham Junction Town Centre Partnership to discuss the full review of the Local Plan and explain that the first stage will be to identify evidence requirements and issues.

- Economic Development Officers

On 26 July 2018, the Policy Team met with colleagues to provide an overview of the Local Plan; the existing Policy Framework, the LPEID, the London Plan, and the NPPF; the broad aims and strategic issues with the plan; the qualitative and management issues around Local Centres and Business Improvement Districts (BID); and shopping malls vs high streets. The EDO discussed the BID evidence and strategies, as well as the Roehampton Initiative.

- Putney Business Improvement District

On 7 August 2018, the Policy Team met with members of the Putney Business Improvement District to discuss the direction and progress of the Local Plan review; achieving housing growth; meeting office/ SME needs and resilience; the Town Centre Policy; and design-led densification.

- Putney Stakeholder Workshop

On 14 February 2019, the Policy Team held a stakeholder workshop to discuss the need to help create the environment; Jubilee house site; iconic buildings; the vision for the town centre; river connections; night time economy; use of river; open civic space; traffic management among other issues raised.

- Port of London Authority

On 26 February 2019, the Policy Team met with the Port of London Authority (PLA) to discuss river related sports and development on the riverside in line with the Thames vision; promoting the river through s106; the use of the river for the transportation of good and construction materials; and changes to existing policies that PLA would like to see. The PLA explained they were preparing guidance for planners relating to safeguarding wharves, lifesaving equipment, visitor mooring, air quality, and biodiversity.

- Arts and Culture

On 29 October 2019, the Policy Team met with Wandsworth Arts and Culture Team to discuss how the strategies and objectives of Arts Council England can be incorporated into the forthcoming Local Plan Review. The Arts and Culture Team explained the plans for the Wandsworth Culture Strategy.

- Development Management

On 5 December 2019, the Policy Team met with the Wandsworth Planning Development Management team to discuss the progress of the Local Plan; site allocations; the health and wellbeing strategy; flooding; waste; employment; housing; masterplanning; tree policy; focal points; upcoming engagement events and any other business.

- Wandsworth Health and Wellbeing Board

On the 20 May 2020, the Policy Team led a seminar with the Health and Wellbeing Board to seek board members feedback to embed health and care priorities within the Local Plan. The seminar discussed policies relating to hot food takeaways; concerns about concentration of older people housing and the need for mixed communities and multi-generational housing; how the Clinical Commissioning Group and estates group is working with Planning in Wandsworth; how the Local

Plan can promote healthy homes and neighbourhoods and prevent loneliness and isolation; how cycling conditions and air quality can be improved in the borough.

### 3 Key themes from the Issues Document consultation

The following views are condensed summaries of the responses to the Issues Document questions and supporting text.

#### 3.1 Vision

- It was suggested that the Council should relax housing height and density policies at transport interchangers in order to meet the requirements of the emerging London Plan.
- Respondents requested that the Local Plan Vision and Objectives should meet a variety of different objectives including: the Mayor's Transport Strategy and the Healthy Streets Approach; better reference to culture and community facilities; include reference to Earlsfield and Crossrail 2; more specificity to Wandsworth; change the wording on heritage to historic environment to be in line with the National Planning Policy Framework (NPPF); greater focus on affordable housing and mixed use development; encourage greater access rather than access reduction; provide a greater focus on healthy places.
- It was stressed that associated infrastructure is needed for the vision to be met.
- Commenters expressed a desire for the Local Plan process to be handled with greater transparency.
- It was agreed by several respondents that the strategic objectives must meet the emerging London Plan's Vision.
- Sites of Importance for Nature Conservation (SINCs) need to be reviewed as the evidence is 20 years old.
- While the existing policies were only adopted in 2016 an update is welcomed.
- Respondents commented that the key diagram should include a public transport route from Wimbledon to Barnes Station Tram Link via Roehampton; conservation areas; and site allocations from the LPEID.
- Other commenters responded that the current plan is too small and lacks detail.

#### 3.2 Growth

- Respondents generally found that the key priority areas were too narrow and that green corridors like the Wandle Valley; Tidal Thames; and Putney Town Centre should be identified on the Local Plan.
- A design code for small housing developments should be brought forward with several offering to assist.
- Of those who commented, some recommended that the Council can support small site development through a dedicated call for sites exercise, by following London Plan Policy H2(D), and by supporting small site developers.
- Commenters found that the current policies need to be more rigid, evidence based, and design-led. The approach should be clearer and stronger.

- Generally, it was believed that the current tall buildings policy does not meet expectations and that it should be more evidence based, it should seek to avoid harm, any new policy should be more rigid. Some commenters also mentioned that the policy should only come into effect once a building is above five storeys and that buildings over five storeys are not inappropriate.
- Many respondents suggested exploring both options (general higher densities or focused areas for tall buildings) in tandem to achieve a balanced approach. Several had support for one of the options but with stipulations and concerns.
- Respondents did not find any heritage assets had lost their special character and all should remain designated.
- There was a desire to review the conservation area boundaries and strengthen the definition of conservation. Several respondents mentioned that more detail and definition could be added to areas such as Tooting and Wandsworth.
- Almost all responders were in support of an Urban Design Study. Those in favour asked for a village approach to be taken, for it to be child friendly, and for conservation areas to be updated. Those against an Urban Design Study saw it as a restriction to development.
- Several examples of good and bad urban design in the borough were brought to our attention including the use of the River Wandle as a positive example and developments along York Road as negative ones.

### 3.3 Housing

- Several responses considered that there had been an under delivery of affordable housing or types of affordable housing they feel Wandsworth needs and not being delivered.
- Some respondents considered that there had been a low delivery of social rent homes and affordable housing more generally in terms of a percentage of total delivery were cited.
- Many respondents viewed the Mayor's threshold for viability as a harsh requirement.
- Several commenters expressed a preference for the Council to implement the Mayoral thresholds and approach to affordable housing.
- Many of the respondents called for the Council to develop a design code for small housing developments.
- Some developers considered that a specific design code for small housing developments would be superfluous and another level of 'design code' is likely to hinder rather than encourage small sites to come forward.
- Respondents agreed that Wandsworth should prepare a policy in line with the Mayor's approach set out in policy H15 which provides a distinction for housing for older people between C2 and C3 uses (sheltered accommodation and extra care accommodation).

### 3.4 Employment and Economic Development

- Comments were received stating that the existing policies within the Local Plan Employment and Industry Document are too rigid, in particular on policy EI3 and EI6 which deal with the Locally Significant Industrial Areas (LSIAs).
- Many comments are seeking that the LSIA designation should be considered for industrial use at ground floor level with offices and residential above.
- Other areas that have been proposed as potential areas for intensification are between Garratt Lane and the River Wandle.
- Support was also expressed for protecting industrial and employment land, and in particular the retention and intensification of industrial areas within railway arches.

- A mixture of comments were received regarding the types of uses that will see the largest growth in the borough, including: ICT, media and creative to office industry, healthcare, hospitality, education, and leisure.
- Commenters agreed that the Local Plan should also consider SMEs, incubator hubs, flexible space for start-ups, apprenticeships, more flexible policy on mixed use developments at industrial locations to allow for start-up SMEs to allow redevelopment.
- Several comments were supportive of an affordable workspace policy and generally proposed that it should be strengthened. A mix of commenters agreed that affordable workspace should either be mixed in with other development, should be flexible and based on viability.
- A town centre first approach was advocated by some respondents.

### 3.5 Transport

- The inclusivity and safety of cyclists was a concern in the consultation feedback. A high percent of people would like to see an increase of high-quality bike facilities around the borough.
- Complaints circulated about the uneven balance of space for pedestrians, cyclists, buses and cars.
- Improvements to the road network were recommended to come forward if the Council continues to support multi-mode usages. The accessibility / capacity of transport hubs was another concern in the issues document, specifically regarding train stations.
- Clapham Junction was repeatedly stressed as needing improvements, a Masterplan was recommended by respondents.
- The flexibility and the connectivity of the public transport system was another issue raised.
- Most consultants in the issues document supported the Crossrail 2 project.
- The main issues with kerb-side usage were with the amount of space that was allocated for delivery vans and the congestion that followed. The consultees worried about the amount of pollution that is caused from the traffic pile ups.
- Taxi / private car hires were debated as consultants are concerned about the congestion and pollution caused by these services. The majority of the respondents agreed that an increase of parking bays for private hires should be enforced to regulate roaming vehicles.
- Parking space in Wandsworth was the highest debated topic in the transport section. The two opinions that seemed to clash was between the increase or decrease of parking spaces.
- Electric charging points were supported in the consultation feedback, specific areas need to be strategized ensuring no harm endures the urban environment and no increase of congestion is caused. Lamppost conversion is suggested in residential areas.

### 3.6 Open Space

- Residents commented that the open space within Wandsworth is an asset and should be protected more and that the privatisation of public land should be strongly prohibited.
- Multiple responses proposed reuses or innovative uses of existing space which could perform the functions of open space such as Lacy Road and Northcote Road.
- Several suggested areas of improvement including: the restoration of the banks and in-channel habitats of the River Wandle within King George's and other public parks; the Thameside Parks could interact more effectively with River Thames; open spaces could be

created through the temporary closure of public streets; Thames Path at Battersea Bridge and the Friends of Christchurch Gardens.

- Respondents commented positively to the Council seeking alternative growing spaces.
- Responders suggested Council Tax and CIL be used to cover the maintenance and management of new parks and open space whereas another asked for privatisation of public land to be stopped and for community uses of the park to be cheaper.
- Several suggestions were submitted which offered additional means of controlling flood risk such as tackling the causes of climate change.
- Respondents were not in favour of restricting minor extensions.
- It was agreed by all that SUDs should be mandated for all developments.
- It was agreed that the SFRA should take account of new modelling and mapping requirement as well as national policy.
- Commenters suggested that the Council should review its current position on the control of emissions of particles and NOx during demolition and construction and carry out a risk assessment to identify potential impacts and corresponding mitigation measures.
- It was agreed that the Council require all major developments to be 'air quality neutral' and resist development proposals which would materially increase exceedance levels of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in the Council's Local Air Quality Management Plan.
- Several commenters suggested policies relating to air quality could be strengthened.
- Most commenters suggested new developments should be carbon neutral.
- Several responders agreed that waste management sites should be safeguarded.
- Multiple responses identified ways in which planning can affect healthy lifestyles such as by restricting the provision of fast food outlets, promoting cycling and walking, developing child friendly areas which encourage activity.

### 3.7 Community

- Several responders commented that clarification of what community facilities are would be beneficial for developers, individuals living close by in neighbouring boroughs, and neighbourhoods such as Tooting.
- In terms of new community facilities several responses included sports and play areas and that they should be walkable and accessible.
- Commenters agreed that there are benefits to be gained from working with other social and community organisations outside the borough including the All England Lawn Tennis Club.
- In terms of community infrastructure several comments identified theatre and concert halls, and there was significant support for a greater amount of public toilet provision.
- A few comments requested additional resources be established for further education as the Governments Apprenticeships scheme rolls out.
- There were several comments made requesting better new health facilities and refurbishment of existing ones.

### 3.8 Policies

- Multiple respondents commented that DMS1, DMS2, and DMS4 could be improved. DMS1 should be more specific about street clutter, DMS2 should have more specific management policies for conservation areas, and DMS4 should require tall building applications to have CAD drawings.



- A general theme to come through was that there needs to be clarity between what is a statutory policy and what is guidance in the new local plan.

## 4 Responses to the proposed areas for review

### 4.1 Vision

The consultation document allows for **general comments** on the vision.

TFL requested an explicit reference to Crossrail 2 in the Local Plan vision and to retain Policy PL3 Part D.

London Underground LTD commented that London Underground Infrastructure Protection is a statutory consultee and should be consulted on any development in the London Underground zone of interest, (including works affecting the highway). Ballymore Group responded that the Council should relax their policies on heights and densities at transport interchanges in order to meet the new requirements of the emerging London Plan.

Covent Garden Market Authority is adapting to meet changing demands in their industry, and it is important to them that general industrial uses are protected to enable these synergies to be maintained and enhanced in the future.

Cllr Graeme Henderson and Cllr Jo Rigby commented that there is insufficient reference to Earlsfield in the issues document.

Historic England recommended the inclusion of a policy to address Heritage at Risk; she expected appropriate references to setting in the emerging policies; requested policy for non-designated heritage assets; stressed the importance of understanding the significance of any heritage asset/s and their setting/s, and areas of known archaeological potential that would be affected by site allocations.

#### **Council Response**

Comments noted.

Due to uncertainty about the viability of Crossrail 2 coming forward in the Local Plan period it has not been included in the vision, however it is referenced in the Spatial Strategy as a longer term solution to traffic congestion. LP 54 Public Transport and Infrastructure A (2) replicated the policy PL3 Part D.

Policy LP 4 (Tall Buildings) proposes to amend the current approach to tall buildings. To ensure that tall buildings form part of a plan-led approach, the new policy identifies broad locations where developments with a tall building element are likely to be acceptable. The choice of these locations has been informed by the Urban Design Study to ensure that tall buildings play a positive role in shaping the character of an area.

Earlsfield has been referenced multiple times in the draft Local Plan.

Policy LP 3 (The Historic Environment) requires development proposals be supported where they sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset (both designated and non-designated), and the historic environment. Additionally, the Council maintains a Heritage at Risk Register in conjunction with Historic England to monitor and find solutions for designated heritage assets that are at risk of losing

their significance through decay or unsympathetic alteration. Part G of the same policy requires that proposals affecting non-designated heritage assets (including locally listed buildings) will be assessed on the scale of the harm relative to the significance of the asset, in accordance with national policy and guidance. Part F requires that proposals for development involving ground disturbance in Archaeological Priority Areas (as identified on the Policies Map), or heritage assets of archaeological interest will need a desk based archaeological assessment and may also require appropriately supervised field evaluation. The recording and publication of results will be required and in appropriate cases, the Council may also require preservation in situ, or excavation.

### **Comments on Supporting Text**

In relation to paragraph 1.0.3 the Clapham Junction Action Group commented that the previous Local plan's vision for building heights has been disregarded over the past ten years and greater clarity is needed going forward as to how this can happen.

In relation to paragraph 1.0.14 the Clapham Junction Action Group commented that this paragraph should be replaced either by "The Local Plan is a reflection of the aspirations and choices of the Council", or a full process to fully consider and include the "aspirations and choices of the local community". But you cannot write "local community" while actually meaning "Council", as this is the case at present, this is gross misleading if it stays as such and should be removed.

In relation to paragraph 1.0.17 the Clapham Junction Action Group commented that there is no evidence published and the recent statement from the Mayor of London of the type of accommodation provided in Wandsworth shows the contrary. This week's announcement that Wandsworth was amongst the boroughs receiving funds to tackle rough sleep is additional evidence that more needs to be done for affordable accommodation while Wandsworth Council has a proven tendency to focus on luxury schemes.

In relation to paragraph 1.0.36 the Clapham Junction Action Group commented that greater clarity is needed as to the purpose and timeline of the SCI.

In relation to paragraph 1.0.46 the Clapham Junction Action Group commented that the wording in the Issues document is speculative and should reflect this or evidence should be presented along with it.

### **Council Response**

Comments noted.

**Question 1 Is the existing Local Plan's vision appropriate in guiding the Local Plan review? If not, what changes should be made.**

TFL requested the Mayor's Transport Strategy and Healthy Streets approach are reflected in the Local Plan vision and objectives and that there is specific reference to Crossrail 2. Battersea Society answered that the Council's vision is inadequate considering the new development and regeneration taking place around the borough. The Theatres Trust commented that the vision and social objectives should better reference culture and community (including cultural) facilities. Clapham Junction Action Group is concerned about that the Local Plan vision is not specific enough for Wandsworth, and that the cumulative impact of developments are not being considered. Wandsworth Society commented it should be emphasized that realisation of this vision is dependent on the provision of necessary infrastructure. TFL Commercial Development agreed in principle with the strategic objectives set out in the current Wandsworth Local Plan, categorised in to environmental, social and economic objectives. Workspace Group and TR Property Investment Trust suggest that the emerging Local Plan's vision aligns with the emerging London Plan's position in relation to strategic industrial land and that the vision of the existing Local Plan (Core Strategy and Development Management Policies) is considered generally sound and was only adopted in 2016 which makes the policies relatively recent compared to many boroughs. However, they both, welcome the opportunity to review each policy and consider that a number could be updated to better reflect current demand and development within the borough.

Historic England commented that placing full value on heritage will not necessarily mean that it will be conserved. The wording could be amended to better reflect the language of the NPPF and seek to conserve and where appropriate enhance the historic environment. They would welcome a focus on repairing heritage within the objectives and recommend that this would be better linked with the aspiration to address Heritage at Risk (HAR) and to encourage enhancements. The term historic environment is considered the most appropriate term to use in the vision as a topic, or policy heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.

Cllr Peter Carpenter of Labour Party responded that under Housing Development, modify 'including affordable homes' to read 'including an increasing proportion of affordable homes in line with the London Plan'. Safestore called for a strengthening of support for mixed use developments, and to promote the synergies between commercial and residential uses where appropriate.

The Putney Society commented that the wording of the aim should be to increase access instead of avoiding reducing access. The focus should be on areas like Roehampton and there should be efforts to encourage greater use of public transport.

The Clinical Commissioning Group commented that health and wellbeing, in particular, healthy places should be included in the vision for the Local Plan. A health and social infrastructure review/ needs assessment will need to be undertaken which the Clinical Commissioning Group would like to be a part of. The Clinical Commissioning Group would like for the Local Plan to show an understanding of its impacts on health and wellbeing. The Clinical Commissioning Group also wished to help the Council understand the need and demand for developments such as nursing and residential homes.

Enable Leisure and Culture responded that SINC's should be reviewed in the Local Plan as the current evidence is 20 years old. The River Wandle has been identified through the London Plan as requiring the Site of Metropolitan Importance. If the government introduces a proposed mandatory

requirement for biodiversity net gain WBC should update the plan to reflect this. An Open Space Study will be required with the new Local Plan as the current Open Space Study is out of date. It is also the best way of allow for changes to facilities.

Labour Group answered that the Council have inadequate social objectives, affordable words need strengthening, with emphasis on rented sector Economic Objectives: The Labour Group is concerned that there is too great an emphasis on the “decaying” retail sector and recommend the Council consider statistics regarding online shopping, percentage switch from traditional retail to online since 2010.

### **Council Response**

The vision and strategic objectives will be updated to better align with the Mayor’s Transport Strategy and Healthy Streets Approach. The central tenets of which will be embedded throughout the plan. The draft Local Plan will reference the potential opportunity presented by Crossrail 2. The Council will continue to work with TfL and other partners to ensure the potential benefits of Crossrail 2 are planned for and harnessed.

The existing Local Plan vision includes reference to a significant scale of development including "New mixed-use quarters opening up the riverside". The Council will update the vision to include reference to the scale and location of development for the next plan period.

The Local Plan will plan for the housing target for Wandsworth allocated by the Mayor in the emerging London Plan. Detailed policies set out the approach to delivery, accounting for the housing target. The draft Local Plan shares the Mayor's vision for housing growth of all tenures including affordable housing in the borough.

The vision and objectives will be amended to include explicit reference to culture objectives set out in the draft plan. The Council are keen to support the role of cultural activities in place making, recognising the importance of cultural facilities.

The Council agrees that to better align the vision and objectives with the priorities and requirements of the NPPF (Paragraphs 117 - 121), emerging London Plan and the policies contained within the draft Local Plan it will include wording to the effect of ensuring the most effective use of available land and reference to site location/context.

Detailed policies set out the approach to delivery, accounting for the housing target. The draft Local Plan shares the Mayor's vision for housing growth of all tenures including affordable housing in the borough. The Council consider that the social objectives sufficiently reflect the ambition to deliver affordable housing.

**Question 2 Is the existing Local Plan Key Diagram appropriate for the Local Plan review, if not, what changes should be made?**

Historic England answered that areas for development should have defined boundaries. TFL commented it should continue to show the indicative Crossrail 2 line in future iterations of the key diagram.

Cllr Peter Carpenter of the Labour Party commented that a public transport proposal from Wimbledon to Barnes Station Tram Link via Roehampton should be added. TFL Commercial Development recommends updating it to show the nascent Clapham Junction Opportunity Area and the boundary of the adopted VNEB Opportunity Area. The Clapham Junction Action Group requested that conservation areas should be mentioned at least. TR Property Investment Trust answered the Key Diagram could include site allocations from the Local Plan Employment and Industry Document.

Battersea Society responded no, it is far too small and lacking in detail and of little real guidance. Maps within SSAD and SPD documents are helpful. More detailed maps should be made available online, capable of being enlarged. Safestore commented that the boundaries on the draft plan should be more detailed to avoid ambiguity. Wandsworth Society responded that the map is too small and lacking enough detail to be useful.

**Council Response**

The Key Diagram will show graphically a variety of areas of growth in the borough including the Nascent Opportunity Area at Clapham Junction, and the VNEB Opportunity Area. It will be supported by other borough wide plans that will provide specific information. Crossrail 2's proposed route will be shown on the borough wide Transport Map and site allocations will be shown on a borough site allocations plan. The Wandsworth Policies Map will be available online and in print in a more detailed format which will include layers for conservation areas and should be viewed along with the Local Plan.

## 4.2 Growth

The consultation document allows for **general comments** on the issue of growth.

TfL commented that proposals for new development should be supported by a Transport Assessment, developed using the latest TfL Best Practice Guidance. Applications should also be accompanied by a Travel Plan, Construction Logistics Plan, Delivery and Servicing Plan, and Parking Design and Management Plan in accordance with TfL guidance.

### **Council Response**

Comment Noted. The Council, as part of its planning application requirements, requires applicants to support development proposals with transport assessments and plans, the extent of the requirements reflects the potential scale of impact on transport and access. More detail can be found in the planning application requirements here:

[http://www.wandsworth.gov.uk/downloads/file/3982/planning\\_application\\_requirements](http://www.wandsworth.gov.uk/downloads/file/3982/planning_application_requirements)

Policy LP 52 (Transport and Development) requires development proposals to demonstrate their effect on traffic and transport by provision of Transport Assessments (TAs) and Travel Plans where they meet the thresholds set out in guidance. TAs and Travel Plans may be required for smaller developments, below the threshold, where the transport impact would be significant or affect sensitive locations. Alternatively, a transport statement for smaller development proposals may be appropriate.

**Question 3 Do you agree that the key priority areas identified in the existing Local Plan are the correct areas to sustain much of the borough's growth, and are there any other areas you think are appropriate?**

TFL Commercial Development, The Battersea Society and the Tooting Bec & Broadway Neighbourhood Forum agreed. Wandsworth Society agreed with the key priority areas but would also like extra transport capacity. They agreed with the key priority areas.

Ms Margaret Brett and Ms Susan Jones commented that it should be noted that the Wandle Valley is a green corridor and requires protection from any environmental contamination from local adjacent industrial use. Cllr Graeme Henderson and Cllr Jo Rigby would like to see the development of a Plan for the Wandle Valley and are seeking the holistic assessment of the cumulative impacts of development.

The Labour Group does not accept the inclusion of Clapham Junction as a key priority area unless the surrounding area is impacted by Crossrail 2. Innova Investments support the identification of CJ as a key priority area to be in keeping with the London Plan Opportunity Areas. Cllr Peter Carpenter of the Labour Party recommended adding Putney Town Centre be key priority areas for development as there is a particular opportunity to redevelop the Bus Garage site.

The Port of London request that Tidal Thames 2016 be considered with any future regeneration or new development especially for use of the river for passengers and freight. The Putney Society presents the argument that east Putney and upper Richmond road is now full. Extra transport capacity and local services required before further development in Roehampton. TFL commented that the Council should focus density around well connected places but do not prevent higher density development in locations away from the immediate catchment area of stations if they are well served by high quality public transport and active travel links. Workspace Group and TR Property Investment Trust suggested identifying priority areas should not rule out high density or major redevelopment schemes outside of these areas. They also commented that WBC should not rule out high density or major redevelopment schemes within areas not identified within a 'priority area'.

Sports England commented that it should emphasise importance of sport, recreation and active travel's role in benefitting resident's health and wellbeing.

Safestore responded that WBC should maintain Nine Elms and adjoining area (Policy PL 11) and suggested that the emerging Local Plan aligns with the industrial policies E4-E7 in the emerging London Plan.

Ipsus Development Company encourages industrial intensification through residential development.

Fiona McKay and Stephan Reinke indicated that the Bendon Valley Lydden District should be designated holistically, with an integrated strategy creating a District Plan and a vision consistent with Wandsworth Borough Council Policy and Mayors London Plan.

Gavin Scillitoe of BAF Graphics responded saying WBC should extend the designation of an Economic Use Intensification Area to cover the entirety of the Bendon Valley Estate. The Bendon Valley Lydden District should be designated holistically, with an integrated strategy. A District Plan and a vision consistent with Wandsworth Borough Council Policy and emerging London Plan. It is imperative that the Council revise its restrictive employment policies, specifically EI3 and EI6 if it is to meet the requirements set by the draft London Plan to 'provide capacity' (paragraph 6.4.6 and Table 6.2) by enabling mixed use redevelopment including residential use to act as a facilitator to enable industrial



sites and buildings that are currently not in the condition or of a design to be fit for purpose to meet the needs and demands of the continually growing SME market.

Clapham Junction Action Group responded that cumulative impacts of developments are not taken into account at a sufficient level by the Council.

Ballymore Group is concerned that the key diagram may be read to exclude significant redevelopment opportunities. They asked that the key diagram is labelled indicative. They suggested the Council review the current local centre designation for Nine Elms as the area has the ability to support an intensified centre allocation.

Historic England did not promote a specific growth option but asked that consideration for the historic environment be included so that the quality and character of neighbourhoods be conserved. The historic environment should be considered when locations for development are being chosen. Finally, they asked that the reference to acceptable harm to the heritage assets be removed.

### **Council Response**

Comments noted.

In developing Area Strategies, it was important to consider the impacts on movement and how they can be accommodated.

There are sites within Wandsworth (including the Wandle Valley) that have previously, or are currently, occupied by industrial activities that could have resulted in land contamination. Where development is proposed on such sites, the Council will promote remediation. Policy LP 14 (Air Quality, Pollution and Managing Impacts of Development) requires a remediation strategy to set out how contamination is going to be addressed. Further, the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on amenity of the surrounding land. These potential impacts include land contamination.

The Area Strategy for the Wandle Valley will:

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

An Area Strategy for Clapham Junction will respond to opportunities by:

- Developing a 21st century urban heart focussed on an improved transport interchange that delivers homes, commercial space and an enhanced cultural, leisure and entertainment offer.
- Providing social and community uses as part of new development .
- Delivering on the master planned regeneration for York Road/Winstanley to deliver housing, including affordable housing and improved community facilities.
- Providing inclusive and connected public realm/open space and urban greening for Clapham Junction town centre that puts people first.
- Enhancing the area's cultural and creative character and its popularity for leisure and night-time cultural economy and entertainment by ensuring development makes provision for cultural, creative, visual and performing arts and other forms of community innovation.
- Growing active travel by promoting pedestrian and cycling connectivity within and to the centre.

The application of planning policy takes a holistic approach to the assessment of all development proposals.

The redevelopment of Clapham Junction station will allow the capitalisation of the area's excellent existing and potential public transport connectivity, regardless of Crossrail 2 implementation, to catalyse growth and regeneration focusing on delivering new homes and creating jobs. The opportunity to create inclusive areas that are attractive across the community is clear and needs to be met. This can provide social and environmental benefits, as well as economic development outcomes. This will offer the opportunity for successful place outcomes. An Area Strategy provides a framework to grasp these opportunities to create an enhanced urban heart to deliver an improved station and mixed use development. This highly accessible area can accommodate higher density and promote connectivity through facilitating active travel. Development opportunities can be set out within an Area Strategy to offer the prospect to support wellbeing and contribute to quality of life.

Area Strategies have been developed for Balham, Putney, and Tooting. Putney's Area Strategy includes appropriate site allocations that excludes the bus garage site as it is not anticipated to come forward during the plan period.

Identifying key priority areas for development through Area Strategies does not exclude development coming forward in other appropriate areas. The Council will be reviewing its growth areas as part of the evidence base prepared for the draft Local Plan. Redevelopment across the borough will be supported where it complies with the development plan and the policy framework will support active travel, recreational provision and accessible provision of community services.

The Area Strategy for Nine Elms supports a master planned approach to the VNEB OA. It wishes to promote the economic development and regeneration of the VNEB OA to ensure that it becomes a strategic employment hub and to develop the BDTQ to enhance and intensify through attracting creative, design and digital SMEs to establish an economic cluster. Nine Elms can be brought forward as an Area Strategy that will allow it to be planned appropriately to address local and regional opportunity.

The Local Plan will promote sustainable transport of passengers and freight on the Thames, protect wharves and take advantage of the riverside location through appropriate Area Strategies to achieve environmental, social and economic outcomes.

The Employment Land and Premises Study established that supply of industrial land is constrained. The Local Plan will aim to retain a strategic reservoir of industrial land and premises. The Lydden Road LSIA and Bendon Valley Estate remains an important contributor to this reservoir.

The Local Plan will provide a framework for considering the social, economic and environmental impacts of development proposals. This will include promoting sites through allocations to accommodate growth over the plan period that recognises and addresses cumulative impacts.

The Local Plan will also identify where there is stress in the built environment either in respect of public transit capacity, open space provision, over-concentration, and other considerations. This will be addressed through Area Strategies and appropriate policy.

Policy will be informed by the Urban Design Study and be positively framed. Policy will establish that development proposals will be supported where they sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset and Policy LP 3 (The Historic Environment). The more important the asset the greater the weight that will be given to its conservation. Further, Area Strategies should establish the heritage merits of an area and, through site allocations, establish considerations and requirements for development proposals.

**Question 4 Should the Council develop a design code for small housing developments, if so; what should a Wandsworth design code for small housing developments consider?**

Cllr Peter Carpenter of the Labour Party answered yes, the Council needs a cut down version of the code for larger developments which avoids placing onerous conditions on small developments; but doesn't allow a 'free for all'.

Tooting Bec & Broadway Neighbourhood Forum recommends a high-level approach to design characteristics in a design code for small housing development, allowing for a site-specific approach in individual locations. They also called for the Council to work closely with Tooting Bec & Broadway Neighbourhood Forum to consider individual sites within the context of a Neighbourhood Plan.

The Battersea Society supported small sites for development of non-residential uses and suggested an SPG would be appropriate if this went ahead.

Port of London, and the Theatres Trust would like WBC to provide direction on Agent of Change principle in design code.

Ms Margaret Brett commented that the Council should develop a design code for small housing development. Clapham Junction Action Group responded that the design code should provide clear guidelines for development.

Sports England recommended referencing the Active Design Guidance published (October 2015) by Sport England and Public Health England. Enable Leisure and Culture responded that any small housing development should have consideration for the provision of playable doorstep space as public playground space is limited.

Historic England would like the Council to comply with NPPF and Historic England would be happy to assist with the development of a Design Code. They ask that the reference to acceptable harm to the heritage assets be removed. The Tall Buildings Policy should make reference to the historic environment or the cumulative impacts tall buildings can have on neighbouring boroughs.

TR Property Investment Trust and Workspace Group commented that a design code is likely to hinder rather than encourage small sites to come forward.

**Council Response**

A small sites policy is set out in the emerging London Plan. This policy has informed the formulation of Policy LP 7 (Small Sites Development). Both of these policies contain the presumption in favour of small housing developments.

To help facilitate the development of small sites for housing, the Council will also aim to prepare a supplementary planning document to identify areas that have the potential to facilitate an uplift in small housing development and set out design codes for those areas. The supplementary planning document will be informed by the Urban Design Study. It is expected that the supplementary planning document will set out a high-level approach to design characteristics, thereby allowing for a site-specific approach in individual locations. As such, it is expected that the design code is likely to encourage; rather than hinder small sites to come forward.

The Council welcomes the opportunity to work with stakeholders with regard to the development of policy and assessment of development proposals.

The Agent of Change principle is set out in the emerging London Plan. Development proposals will be expected to follow that policy as established in Policy LP14 (Air Quality, Pollution and Managing Impacts of Development).

Policy LP19 (Play Space) will require new major residential developments and mixed-use schemes with a residential component to make on-site provision for 10sqm of dedicated play space per child.

Policy LP 4 (Tall Buildings) includes a reference to the historic environment and the cumulative impacts of tall buildings.

**Question 5 If the Council were to develop a design code for small housing developments are there any areas that should or should not be considered?**

Cllr Peter Carpenter of the Labour Party commented that as small developments are likely to be adjacent to existing buildings, it will be important to control activity during the building phase to avoid disruption to adjacent residents.

The Theatres Trust responded that policy should be against conversion or upward extensions within non-residential properties. Labour Group answered yes, but only of generic type, controlling over-looking, area suitability.

Port of London Authority commented that the borough's five safeguarded wharves must be excluded from consideration as potential sites for small site housing development within the borough.

Enable Leisure and Culture commented that areas of Tooting in particular Tooting ward, Graveney ward and Furzedown ward should not be considered unless doorstep play of good play value can be accommodated within the development site footprint.

**Council Response**

Policy LP 14 (Air Quality, Pollution and Managing Impacts of Development) requires the submission of Construction Management Statements (CMS) for all major developments; developments of sites in confined locations or near sensitive receptors; or if substantial demolition/excavation works are proposed. This policy seeks to manage and limit environmental disturbances during construction and demolition.

The Council will consult Tooting Bec & Broadway Neighbourhood Forum and other stakeholders as part of the preparation of any supplementary planning documents, including for small site development.

Policy LP 7 (Small Sites Development) establishes criteria for consideration of proposals for small site development. Further details will be contained in the supplementary planning document. Any development proposals will be expected to comply with the Agent of Change principle to ensure that noise-sensitive uses do not prevent the operation of noise-generating uses.

Local Plan Policy LP 43 (Protected Wharves) will safeguard wharves for the transshipment of freight. The introduction of residential development on these sites will only be permitted where the long-term operation of the wharf can be ensured, including access arrangements. Furthermore, development proposals on sites adjacent or in close proximity to the safeguarded wharves will be subject to the Agent of Change principle as set out in the draft London Plan (See Policy D13).

Policy LP 19 (Play Space) will require new major residential developments and mixed-use schemes with a residential component to make on-site provision for 10sqm of dedicated play space per child. This will ensure that there is sufficient access to play equipment across the borough.

**Question 6 What can the Council do to better support small site development in appropriate locations in the borough?**

TR Property Investment Trust recommends the Council identify small sites for in a "call for sites" exercise. The Workspace Group made a similar comment with an emphasis on rigour.

The Environment Agency commented that biodiversity net gain should be important to small sites, especially along the Thames corridor and green infrastructure should be made necessary even for small sites.

Cllr Peter Carpenter of the Labour Party responded that the Council should be more supportive of small developers - providing proactive advice and guidance.

Tooting Bec & Broadway Neighbourhood Forum would like the Council to work closely with Tooting Bec & Broadway Neighbourhood Forum to reach joint solutions within the context of a Neighbourhood Plan.

The Putney Society commented that Map 2 has some odd shaped patches (e.g. the triangles at Roedean Crescent, Roehampton Village and Putney Heath) that don't seem to relate to anything on the ground. They questioned if intensification was effective.

TFL Commercial Development commented that the Council should prepare area wide design codes for small housing developments. This should be in response to policy H2(D) of the draft London Plan, which states that borough's should apply a presumption in favour of small site development on sites involving infill development on vacant or unused land or buildings and in areas with PTAL 3-6 or within 800m of a transport interchange or town centre boundary.

To further support small site development across the borough, the Council should follow guidance outlined in draft London Plan policy H2(C) which encourages boroughs to increase planning certainty on small sites by:

- 1) Identifying and allocating appropriate small sites for residential development.
- 2) Listing these sites on their brownfield registers.
- 3) Granting permission in principle on specific sites or preparing local development orders

The Wandsworth Society noted that the development of small sites can be positive.

**Council Response**

Identification of small sites is challenging as many can emerge over time. However, through policy LP 7 (Small Sites Development) the Council will support proposals for infill and backland development and for redevelopment on small sites to provide housing. The policy will increase certainty for small sites that can encourage their development. Providing greater certainty in this way will be of benefit to small developers.

Policy LP7 (Small Sites Development) requires proposals to protect and enhance biodiversity and green and blue infrastructure and maximise opportunities for urban greening. Further, the Council will aim to prepare a supplementary planning document to set out design codes for small sites that can provide guidance for biodiversity.

To help facilitate the development of small sites for housing, the Council will aim to prepare a supplementary planning document to identify areas that have the potential to facilitate an uplift in small housing development and set out design codes for those areas. The supplementary planning document will be informed by the Urban Design Study.

The Council has and will continue to work closely with Tooting Bec & Broadway Neighbourhood Forum on matter related to the Neighbourhood Plan and Local Plan.

Following the reduction of the housing target for small sites in Wandsworth, Map 2 has been superseded. The map was used for context only and has not been carried forward in the Draft Local Plan.

Informed by the Urban Design Study, policy will be developed to ensure the optimum use of land and appropriate intensification to ensure effectiveness. The Plan will provide a policy framework to deliver and manage sustainable development. In accordance with the London Plan, intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a Tube, rail station or Major or District town centre boundary. Policy LP 7 (Small Sites Development) has therefore been informed by the guidance set out in the emerging London Plan.



### **Question 7 Do you agree with the Council's current approach to tall buildings?**

Clapham Junction Action Group would like to see the current approach to tall buildings amended.

Ms Susan Jones and the Labour Group of Wandsworth Council commented that the policy is too flexible and it should be made more rigid. Lynne McNulty agreed with the policy except that the Business Village does not meet the aspirations of those in the local area. The Putney Society supported the current approach however, too many consents are given undermining the value of all other policies. Cllr Graeme Henderson and Cllr Jo Rigby are concerned that 12-14 storey development is out of place in Earlsfield.

Historic England commented that areas earmarked for tall buildings must be evidence based; this evidence should then inform subsequent site-specific policies so that the expectations for the site are clear from the outset to decision makers and applicants. The approach to tall buildings makes no reference to the historic environment and the potential wide-ranging impacts that tall buildings have on the setting of heritage assets. We request that building heights are set in metres and not storey heights. When determining locations for tall buildings we would refer you to our Advice Note 3 'The Historic Environment and Site Allocations in Local Plans.

TFL Commercial Development responded that the use of the density matrix, and the use of prescriptive development height definitions within Table 2.1 of adopted Wandsworth DMP policy DMS4, including a blanket categorisation of proposals '5 storeys and above' as 'tall' in the majority of the borough, does not appear to follow a design-led approach.

Support amendments to adopted tall buildings policy DMS4 of the adopted DMP document which promote a design-led approach to determining acceptable development densities in line with draft London Plan Policy. Support for design-led optimisation of development densities can be supported by overarching policy displaying areas which may and may not be suitable for tall buildings, such as Map 17 of the adopted Core Strategy, which do not implement prescriptive 'tall buildings' definitions that may restrict development potential.

The GLA called for Wandsworth to refine its approach to tall buildings to reflect the guidance in draft London Plan policies D8, HC2 and HC3 so that tall buildings are limited to appropriate locations referencing the joint ICOMOS/ICCROM Reactive Monitoring Mission to the Westminster World Heritage Site (WHS) and the recommendations of the World Heritage Committee in 2017 in regards to the development of tall buildings in the Vauxhall area. Questions whether there is justification to designate the land along the River Thames as an area appropriate for further tall building development. Workspace Group had concerns over duplication of policy.

Innova Investments suggested that any new strategic policy on tall buildings needs to recognise that Opportunity Areas have a very important role to play in accommodating higher density development, including taller buildings, and therefore any new policy should give greater significance to the role of Opportunity Areas to accommodate tall buildings.

Putney High Street Development commented that the existing Tall Building policy is not positive. They encourage the Council to acknowledge that there are many such cases of new schemes where a quantum of height, bulk and massing can be provided and designed sensitively, that in turn ensures such schemes are viable, and their community and planning benefits can actually be realised. Support tall buildings being directed to town centre locations.

Ballymore Group and TR Property Investment Trust responded that justifying a scheme against the 15 point scheme from current Policy DMS4 is unnecessary.

## **Council Response**

Policy LP 4 (Tall Buildings) proposes to amend the current approach to tall buildings. To ensure that tall buildings form part of a plan-led approach, the new policy identifies broad locations where developments with a tall building element are likely to be acceptable and establish criteria relating to location and would not result in any adverse visual, functional, environmental and cumulative impacts. The choice of these locations has been informed by the Urban Design Study to ensure that tall buildings play a positive role in shaping the character of an area.

In accordance with Policy LP 4 (Tall Buildings), proposals for tall buildings element will need to be of such a design quality that it enhances the character of the place within which it is set. The London Plan Policy D8 (Tall buildings) sets out detailed requirements and criteria against which tall building proposals will be assessed. These include consideration of the visual, functional, environmental and cumulative impacts of development. The criteria outlined in the London Plan are complemented by additional criteria in Part B of Policy LP 4.

Policy LP 4 (Tall Buildings) includes a reference to the historic environment and the cumulative impacts tall buildings.

The Urban Design Study has developed a number of local definitions, which assume that tall buildings in Wandsworth are those that are 8 storeys or taller; or are 50% higher than the prevailing height of the local context. Any reference within the Local Plan to number of storeys would be for residential storeys. Proposals for commercial premises should be consistent with the parameters set by the height in metres for the identified number of residential storeys. The heights expressed in all parts of the Local Plan are expressed as storeys and assume an average storey height of 3 metres. Applications for tall buildings will be required to express the height of buildings in storeys and metres in order for a robust assessment of their effects to be carried out.

The Urban Design Study (which informed Policy LP 4) has considered the impacts of tall buildings on the Westminster World Heritage Site (WHS).

Policy LP 4 (Tall Buildings) has considered the role that opportunity areas can play in accommodating higher density development, including tall buildings. The Nine Elms Opportunity Area has been identified as an area with 'Opportunities for tall building clusters and/or landmarks'.

**Question 8 "Do you agree that the locations where tall buildings may be appropriate and the locations where tall buildings are likely to be inappropriate as set out in the existing Local Plan policy DMS4 Tall Buildings (see table 1. & map 3 below) are correct? If not, please explain your answer**

Historic England commented that it is necessary for a heritage appraisal exercise to be carried out at allocation stage to determine whether the site is indeed suitable for a tall building in the first place. In some instances, site allocations may need to be supported by heritage impact assessment where they are in areas of heritage sensitives, especially those affecting the Westminster heritage site. As part of the full review of the Local Plan, Historic England would expect policies to be updated and revised, given the increasing trend for tall buildings across London and the cumulative harm that these are now posing. We would request that this policy is updated to reflect current circumstances and current development pressures. There is only so much DM policy criteria can achieve if the principle has already been set. The Local plan should seek to avoid harm in the first instance rather than relying only on mitigation at application stage.

Enable Leisure and Culture commented that the Wandsworth vistas should be considered when tall buildings are being given planning permission. The Wandsworth Society commented Council decision making has eroded the policy, viability arguments used to increase building heights.

Wandsworth Society, Clapham Junction Action Group and Wandsworth Council Labour Group commented that the policy is too flexible and it should be made more rigid. Cllr Peter Carpenter of the Labour Party responded that these areas are broadly appropriate, but the boundaries should not be rigidly applied. In some cases, there are adjacent areas where tall buildings may be appropriate. Equally there are sensitive areas within the designated tall building areas where they may not be appropriate - for example adjacent to important heritage assets.

TFL Commercial Development responded that a more general approach to determining areas of identified suitability for 'tall buildings' as demonstrated in Map 17 of the adopted Core Strategy, along with the design-led approach to determining development densities advocated by draft London Plan policies D2 and D6.

Workspace Group and TR Property Investment Trust commented that for areas not in an area considered acceptable for tall buildings, the policy should more clearly state that the Tall Buildings policy is only considered once a proposal is above 5 storeys, not that development above 5 storeys is forbidden. Ballymore Group thought a blanket tall building policy outside acceptable areas is inappropriate and that policy should be more flexible. Innova Investments requested specific reference to opportunity areas.

**Council Response**

Policy LP 3 (the Historic Environment) will require development on any sites (including site allocations) to sustain, preserve and enhance the significance, appearance, character, function and setting of heritage assets and the historic environment.

Policy LP 4 (Tall Buildings) has been informed by the Urban Design Study, thereby reflecting current circumstances and development pressures. The proposed approach seeks to ensure that the cumulative impact of tall buildings avoids harm to the character and unique qualities of the borough.

Policy LP 4 (Tall buildings), contains detailed criteria for the assessment of tall buildings, which include an assessment of the impact on the existing historic environment to demonstrate how, the

surrounding area's character or appearance or the setting of a listed building will be preserved or enhanced. Important local views to be protected are listed in the Local Views Supplementary Planning Document (SPD).

The proposed approach to tall buildings recognises that in exceptional circumstances there might be sites outside the identified areas where tall buildings can be accommodated. This applies to sites that part of a strategic masterplan area which has identified that the principle of accommodating tall buildings is acceptable; or in cases when a convincing justification is provided to demonstrate the appropriateness of the site to accommodate a tall building(s). The proposed approach to tall buildings also recognises that there will be sites in the identified areas where tall buildings may not be acceptable.

Policy LP 4 (Tall buildings) is based on local definitions of "tall", identified as part of the Urban Design Study. The policy makes a clear differentiation between local definitions of "tall" and areas where tall buildings may be acceptable. Local Plan policy for tall buildings can be developed, informed by the Urban Design Study, to establish criteria relating to location and would not result in any adverse visual, functional, environmental and cumulative impacts.

**Question 9 To meet the challenging growth needs for homes, businesses and infrastructure should Wandsworth:**

- **Encourage more tall buildings in Key locations in the Borough and work to increase the housing numbers provided on large sites; and/or**
- **Place greater emphasis on higher densities across the borough, even if this means compromising some existing standards, e.g. open space or introducing more flatted developments into typically low-density areas including single family housing areas.**

Labour Group commented that tall buildings should be clustered together, and tenure blind planning puts greater pressure on the poorest in society. Clapham Junction Action Group responded that alternative possibilities should be suggested.

Cllr Peter Carpenter of the Labour Party responded that it is proposed to increase the definition of non-tall buildings by one storey (to 6 storeys) in order to gain greater overall floorspace rather than building more tall buildings. Both approaches are encouraged; but emphasise density over height.

Tooting Bec & Broadway Neighbourhood Forum commented that greater density is possible but should not be sought at any cost. Our local consultation shows that open space and a housing mix that meets the needs of the established local population are both important. We would like the Council to work closely with Tooting Bec & Broadway Neighbourhood Forum to reach joint solutions within the context of a Neighbourhood Plan.

Wandsworth Society and Battersea Society responded that high density developments should only be approved where they include London Plan approved levels of social and affordable housing. Possibility for high density development around Clapham Junction Station. Would require comprehensive reassessment of access to and through station. Highlight problems of poorly designed and crowded public housing.

TR Property Investment Trust, Workspace Group and TFL Commercial Development recommend actively exploring both options, higher densities across the borough and encourage more tall buildings. Throughout the borough, to encourage sustainable growth development proposals within or outside of key locations should be directed towards areas of capacity including those well-connected by public transport and other transport means as prioritised in draft London Plan Policy GG2(B).

Innova Investments recommends supporting both more tall buildings and higher density across the borough with the starting point being prioritising tall buildings and higher density development in the less sensitive locations that are more responsive and appropriate to accommodate significant change, such as town centres and Opportunity Areas.

Clapham Junction Action Group suggested that alternative possibilities should be explored.

**Council Response**

The Urban Design Study which will take a design led approach to identify suitable locations for tall buildings and development densities. The study will develop this understanding through a design-led approach that considers local character, historic assets, connectivity and the existing provision of other infrastructure. This will inform policies for tall buildings, small site development and site allocations in Area Strategies.

Policy LP 4 (Tall buildings), informed by the Urban Design Study, has identified the most appropriate locations for tall building development, including opportunities for clusters. Policy LP 25 (Affordable

Housing) will require the design, type, size and mix of the affordable homes to be such that the development is 'tenure blind' in respect of its character and appearance.

The Local Plan seeks to strike a careful balance between achieving greater density and protecting open space. The Council has and will continue to work closely with Tooting Bec & Broadway Neighbourhood Forum on matters related to the Neighbourhood Plan and Local Plan.

Families can lead full and active lives in tall buildings where this is carefully considered in the design of the building. The Urban Design Study has identified areas suitable for small site development and higher densities. This will be promoted through Local Plan policy and supporting SPD.

Policy LP 25 (Affordable Housing) will require that affordable housing is provided in accordance with the threshold approach set out in the London Plan on individual sites outside the Nine Elms Opportunity Area. The Urban Design Study assessed the potential for tall buildings across the borough, including around Clapham Junction Station.

Policy LP 4 (Tall buildings) identifies opportunities for tall buildings both within key areas of growth (such as town centres), as well as in less sensitive locations outside the key areas for growth.

Informed by the Urban Design Study and Strategic Housing Market Assessment (SHMA), Local Plan policy can be developed for accommodating higher density residential development with appropriate affordable housing requirements.

The Area Strategy for Clapham Junction, developed through public consultation and engagement, will secure development through site allocations that will promote good quality social, environmental and economic outcomes.

The Local Plan provides the opportunity to direct growth through site allocations across the borough's existing and emerging centres and other areas (including the Wandle Valley and Riverside). In addition, through promoting appropriate residential development for small sites, growth can be accommodated more widely.

**Question 10 Are there any existing heritage assets which have lost their special character and should no longer be designated? Please identify the heritage assets and justify why they have lost their special character or significance.**

Battersea Society responded none that they are aware of.

Innova Investments suggest that it is critical that policy recognises that there will need to be a balance between securing public benefits from development and potential impacts upon local heritage assets; particularly for Clapham Junction.

Historic England commented that de-designation of heritage assets should not be encouraged in the Local plan.

Wandsworth Society commented that a heritage site becoming derelict should not be a reason for it to be redeveloped into something else.

**Council Response**

Striking a balance between development and the impact on heritage assets will be a key consideration for any Clapham Junction Area Strategy, site allocation requirements and historic environment policy of the Local Plan. This will be informed by the Urban Design Study.

The Council continues to monitor the status of its heritage assets and currently has no intention of de-designating any heritage assets or adopting policy to encourage de-designation.

Policy LP 3 (The Historic Environment) will establish that where development proposals involve substantial harm to (or total loss of significance of) designated heritage assets they will be resisted unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss and has been clearly and convincingly demonstrated in accordance with national policy and guidance.

Further, where there is evidence of deliberate neglect of, or damage to, a heritage asset, any consequential deteriorated or damaged state will not be considered in any decision.

**Question 11 In addition to conservation areas, are there any other areas with a special Character that warrant recognition in policy and should inform the types of new developments that will be acceptable in those areas?**

Cllr Peter Carpenter of the Labour Party responded that the boundaries of conservation areas should be reviewed. There are some conservation areas where the boundaries are somewhat arbitrary and would benefit from modest extensions. Wandsworth Society and Clapham Junction Action Group would like the definition of conservation areas to be strengthened. Ms Margaret Brett responded that the Southfields grid should be protected.

Tooting Bec & Broadway Neighbourhood Forum commented that the character of Tooting is not captured in this document and more information including the built, spatial, social, and demographic factors should be captured.

Battersea Society wished to continue to protect retail frontages. They commented that they have an inventory of photos and information which they would like to see incorporated into the Local plan as depictions of the character of the area.

Historic England recommended creating a borough wide characterisation process that identifies areas of local interest and local townscapes. These areas would not be designated but would be helpful for defining the character of localities.

**Council Response**

Changes to conservation areas can be made outside of a Local Plan process. The Council has a duty to continually monitor the performance of conservation areas in the borough. Policy LP 3 (The Historic Environment) sets out an approach for managing Wandsworth's heritage assets and was informed by the Urban Design Study.

The Area Strategy for Tooting has been informed by the built, spatial, social and demographic factors characterising Tooting.

The Urban Design Study may inform development decisions in future. It will identify sensitive areas including Southfields and establish guidance for small site development that will be presented in Local Plan policy and a supporting SPD.

The Urban Design Study has established the character and merits across the borough. This has informed policy related to the historic environment and the approach for the Area Strategies.

The Urban Design Study informed the development of a Wandsworth Town Area Strategy and Clapham Junction Area Strategy (including site allocations).



**Question 12 Are there areas of Wandsworth which are in need of regeneration, where development should be encouraged to change and improve the character? Please provide details.**

Cllr Peter Carpenter of Labour Party commented that industrial sites, and former industrial sites along the railway line into Waterloo could benefit from regeneration and more mixed development.

Battersea Society responded that transport infrastructure should be planned for in accordance with any new residential development that will see the local population increase.

The Wandsworth Labour Group would be open-minded or welcome regeneration as regards Patmore/Savona in Battersea and the Hazlehurst Estate, Tooting.

The GLA commented that Wandsworth should continue to work with neighbouring council Lambeth to deliver the 18,500 jobs and 18,500 homes in the Opportunity Area (see Figure 2.2 in the draft new London Plan).

Putney High Street Development acknowledged the importance that town centre schemes can provide in acting as a catalyst for future regeneration and boosting the local economy through expenditure in shops and services by new residents and workers. They also stated that the existing retail policies DMTS 3 and DMTS 5 are too inflexible in their approach with their requirements for 3 non-consecutive A1 uses, and that there must be a minimum of 70% A1 in core shopping frontages. Consequently, they commented, Putney High Street needs regeneration, and the restrictive policy should be relaxed.

Historic England responded that they have no preference regarding areas of potential regeneration as this will depend on the type and scale of projects being considered and how the historic environment will be considered. Regeneration schemes can often provide opportunities to address heritage assets most at risk within the borough, so Historic England do recommend that this is a consideration in forthcoming regeneration programmes.

**Council Response**

The Council reviewed the employment sites and industrial designations informed by the Employment and Industrial Land Study. Proposals for mixed use developments on undesignated industrial sites will be supported and expressed through industrial and employment policy.

Area Strategies will identify regeneration opportunities and establish infrastructure requirements to support the redevelopment.

The Council will continue to work with Lambeth to deliver on the objectives of the Opportunity Area Planning Framework.

Informed by the Urban Design Study, Retail Needs Assessment and other evidence base studies, the Area Strategy for Putney directs, manages and guides regeneration.

Comments on heritage are noted. The historic environment is recognised as a valued asset through policy and specific requirements and considerations are established in the Area Strategies.

**Question 13 Should the borough develop an Urban Design Study, if so what should it consider?**

Cllr Peter Carpenter of the Labour Party answered yes, currently design is considered on a case by case basis on individual major developments. An overarching design policy would inform design parameters for smaller developments and ensure a more consistent approach to larger developments. Tooting Bec & Broadway Neighbourhood Forum responded yes, a 'village' approach. We would like the Council to work closely with Tooting Bec & Broadway Neighbourhood Forum to achieve this within the context of a Neighbourhood Plan.

Cllr Graeme Henderson and Cllr Jo Rigby responded that a child friendly initiative should be considered with design. Battersea Society commented that conservation area character appraisals should be updated with design studies rather than producing a cross-borough document.

Port of London Authority broadly supported the development of an Urban Design Study for the borough. TR Property Investment Trust and Workspace Group commented that Urban Design Studies are not supported as they may produce further restrictions than opportunities.

**Council Response**

Comments noted. The Council has prepared an Urban Design Study to provide a holistic understanding of borough character, and to identify suitable areas for growth.

Policy LP 2 (General Development Principles) and LP 3 (The Historic Environment) was informed by the Urban Design Study. The study identifies how the Council can support the delivery of buildings and spaces that positively respond to local distinctiveness through form, layout, quality and character. The study identifies capacity for growth and sets out how development can best strengthen what is valued.

The Council has and will continue to work closely with Tooting Bec & Broadway Neighbourhood Forum on matters related to the Neighbourhood Plan and Local Plan.

The Urban Design Study provides a holistic understanding of borough character, and identifies suitable areas for intensification setting out the appropriate development typologies in these locations.

**Question 14 Please provide any locations that you feel provide a good or bad example of urban design in the borough and why?**

The Environment Agency commented that any redevelopment of the River Wandle should be focused on the river as a focal point.

Cllr Peter Carpenter of the Labour Party commented that the SWISH building adjacent to East Putney is seen positively and the Block of Flats on Wandsworth High Street adjacent to the NatWest Bank seen negatively.

Battersea Society responded that the Riverlight public realm and elements of Battersea Power Station public realm are seen positively. Much of Nine Elms and developments along York Road are seen negatively.

Ms Margaret Brett responded that 100 Pirbright is seen negatively.

Enable Leisure and Culture commented that Ram Brewery treatment of River Wandle is seen positively.

Clapham Junction Action Group commented that developments along York Road are seen negatively.

The Wandsworth Society accept the need for an Urban Design Study. Examples of where an Urban Design Study might have avoided problems in the past are the south part of Riverside Quarter and the Nine Elms developments adjoining the main railway, both of which are over-bearing and undistinguished.

**Council Response**

Comments noted.

### 4.3 Housing

The consultation document allows for **general comments** on the issue of housing.

Tim Price commented that adequate transport infrastructure is needed to meet growing residential numbers.

South West London Hospital responded that the Local Plan should meet as much of the housing target as expected to be in line with national policy and proposed development sites should be optimised.

Thames Water responded that they offer a free pre planning service where developers can engage them to understand what, if any, upgrades will be needed to serve the development where and when.

South West London & St George Mental Hospital - NHS Trust stressed the optimisation of land, referring to paragraph 123 of the NPPF.

The GLA commented that where a spatial development strategy has been published, local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to re-visit their local housing need figure when preparing new strategy or non-strategic policies. Wandsworth is encouraged to prepare design codes to guide small housing developments in line with draft London Plan policy H2. Conservation Areas should not be excluded as conversions and some extensions and infill may be appropriate in these areas.

#### **Council Response**

The Local Plan recognises that adequate transport, digital, blue and green infrastructure is needed to meet growing residential numbers.

The Local Plan recognises the requirements set out in the NPPF and policy D6 of the emerging London Plan to optimise housing density. Consequently, the Local Plan takes a pro-active approach to housing delivery, which is embedded in a number of policies. These include a positive approach to housing delivery on small sites, optimising site capacity through a design-led approach and identifying opportunities to maximise delivery through estate improvement, renewal and regeneration. In addition, we intend to prepare a supplementary planning document setting out design codes for key areas with capacity for growth. All these measures will create strong foundations to meet and exceed the housing requirement during the lifetime of this Plan.

The Local Plan will seek to deliver at least 19,500 homes between 2019/20 – 2028/29, as set out in the emerging London Plan.

The Council has prepared a Local Housing Needs Assessment that identified the need for PBSA in the borough.

Policy LP 7 (Small Sites Development) does not preclude small site development in conservation areas.

### **Comments on Supporting Text**

In relation to paragraph 1.3.2 Cllr Paul White responded that this is clearly a ridiculous comment, when last year only 60 council or social rent homes were built in the borough and only 10% of all builds were "affordable" and some of them at 80% of market rates, clearly not affordable to average and below earners. With over 50% of the population of Wandsworth on average earnings, who were the 90% of homes built last year in Wandsworth for?

In relation to paragraph 1.3.4 Clapham Junction Action Group commented that greater affordable accommodation is required on all new developments.

In relation to paragraph 1.3.5 Cllr Paul White commented that gentrification should be avoided at all costs and more developments should be genuinely affordable

In relation to paragraph 1.3.6 Cllr Graeme Henderson and Cllr Jo Rigby responded that Greater attention should be given to the traveller communities within the borough such as those at Earlsfield.

In relation to paragraphs 1.3.7 and 1.3.8 Cllr Paul White commented that the Council should have a much stronger position with regards enforcing affordable housing targets.

### **Council Response**

London Plan policy H6 sets a strategic target for 50% of all homes to be genuinely affordable, and introduces a threshold approach which removes the need for individual applications to be supported by a viability assessment as long as the proposed provision of affordable housing meets that threshold. Local Plan policy LP 25 will seek to support the achievement of the Mayor's strategic target wherever possible. The policy proposes an equal split of 50% low-cost rented housing and 50% intermediate housing. This approach will help to bridge the housing offers available to a range of households rather than perpetuating a polarised approach to meeting housing need which fails to consider the importance of creating mixed and balanced communities.

Battersea and Roehampton regeneration areas are characterised by a single tenure social housing. In line with the NPPF one of the objectives was to achieve mixed and balanced communities in these area by rebalancing the stock, such as through the introduction of mixed tenure and student housing. The regeneration schemes offer replacement homes for existing residents residing in social housing.

The Council has undertaken a Gypsy and Traveller Accommodation Needs Assessment (2019). It identified that there is currently no evidenced requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough. Nevertheless, should demand exceed supply in the future, the Council will actively explore options to identify an additional site(s), in accordance with Policy LP 34 (Gypsy and Traveller Accommodation).

**Question 15 In relation to an affordable housing target should the Council:**

- Continue to seek the highest maximum level of affordable housing provision in the borough subject to viability;
- Rely on the draft London Plan's Policy of a minimum of 35% as a threshold and not require viability assessments for schemes that achieve this; or
- Agree a lower threshold if justified, for instance due to other infrastructure requirements to ensure the scheme meets the requirements of the local plan?

Cllr Paul White commented that the Council should have a much stronger position with regards enforcing affordable housing targets. Cllr Graeme Henderson and Cllr Jo Rigby commented that along with affordable homes, genuinely affordable homes should be encouraged. Labour Group responded that affordable housing targets should be met unless there are protections stopping the loss of low-cost housing.

South West London Hospital and HS Property Services answered that they welcome the sale of their properties for residential and support the ability to agree lower thresholds of affordable housing in order to re-provide healthcare facilities.

Wandsworth Society responded that they support the 50% strategic target and if affordable units are being provided they must be on site and not situated elsewhere.

Clapham Junction Action Group; Putney High Street Development; and Cllr Peter Carpenter of the Labour Party answered that the 35% threshold is a minimum and the Council should push to provide a greater amount of affordable housing than this. Viability assessments should be made public to increase transparency. Celeste Giusti of GLA responded that the threshold approach of 35% or 50% on public land or where industrial capacity is lost. Mayor would have no objections to a policy seeking contributions from schemes of fewer than 10 dwellings.

Putney Society; The Ballymore Group; The Battersea Society; Workspace Group; Tooting Bec & Broadway Neighbourhood Forum commented that the London Plan target is acceptable.

TR Property Investment Trust; Innova Investments responded that development of Clapham Junction Station should accompany a specific consideration or a bespoke lower affordable housing threshold. The delivery of the new station proposals is reliant on the critical delivery of supporting development to help in releasing the necessary funds for this infrastructure to be delivered.

**Council Response**

London Plan Policy H6 sets a strategic target of 50% of all homes to be genuinely affordable, and introduces a threshold approach which removes the need for individual applications to be supported by a viability assessment as long as the proposed provision of affordable housing meets that threshold. Policy LP 25 (Affordable Housing) will seek to support the achievement of the Mayor's strategic target wherever possible.

The Council's adopted Planning Obligations SPD sets out that the Council's expectation is that delivery is through on-site provision. This supports the maintenance or creation of mixed and balanced communities. Affordable housing delivery will only be considered by way of off-site provision in exceptional circumstances, where it can be clearly demonstrated that affordable housing cannot be delivered on-site or where it can be clearly demonstrated that off-site provision would better achieve the objective of creating mixed and balanced communities than through on-

site provision. Financial contributions will only be acceptable in very exceptional circumstances, and only where this is supported by detailed viability evidence to demonstrate that the provision of on-site affordable housing is not deliverable, that off-site provision has been explored but is not deliverable, and that accepting a financial contribution will not be detrimental to the delivery of mixed and balanced communities.

The Mayor's threshold approach to affordable housing does not mean that only developments providing a minimum of 35% affordable homes will be supported. Rather this is the threshold above which, in some circumstances, that an application will not be subject to a viability assessment to assess the level of affordable housing.

The Council will be updating its Local Plan Viability Assessment and Development Infrastructure Funding Study (DIFS) to ensure that it has taken account of any changes in order to strike a balance between meeting its affordable housing needs, whilst ensuring that the total cumulative costs of Local Plan requirements do not threaten the delivery of much needed development as a result of scheme viability.

**Question 16 Do you have any other comments on planning for affordable housing in Wandsworth?**

Labour Group; Cllr Peter Carpenter of the Labour Party; Cllr Paul White commented that the Council need a firmer position on affordable housing, both raising the bar and enforcing it properly. Ipsus Development Company answered that Wandsworth Council has only produced 10% affordable housing during 2017/2018 and the Council will need to find alternative means to raise this number. Battersea Society answered that on-site delivery of affordable housing should be provided not off-site delivery.

NHS Property Services commented that local policies should be kept if they include preferred affordable housing tenures which are explicit in supporting the delivery of homes and tenure and type that meet the needs of essential local workers, and for priority to be given to occupation of affordable homes, on NHS owned sites for NHS workers.

**Council Response**

Comments noted. Local Plan Policy LP 25 (Affordable Housing) proposes that the threshold level of affordable housing must equate to at least: 35% on individual sites outside of the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB OA); 15% on individual sites within the VNEB OA; 50% for public sector land on individual sites outside the VNEB OA where there is no portfolio agreement with the Mayor; and, 50% in Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites where the inclusion of residential uses is considered appropriate in accordance with the emerging London Plan Policy E7 (where the scheme would result in a net loss of industrial capacity).

The Local Housing Needs Assessment analysed the housing needs of essential local workers. The findings of the study have been reflected in the proposed approach to affordable housing set out in Local Plan policy LP 25 (Affordable Housing).



### **Comments on Supporting Text**

In relation to paragraph 1.3.10 Cllr Paul White commented that the lack of rented properties at council level or rents formulated for 1/3rds of average earnings of the person concerned, this is the level of decency now accepted in rental terms.

In relation to paragraph 1.3.11 Cllr Paul White commented that they cannot move out of the rented sector because Wandsworth planning policy has allowed too many homes to be built that they cannot afford to rent or buy.

In relation to paragraph 1.3.11 Clapham Junction Action Group disagreed with some of the figures regarding existing housing tenures.

In relation to paragraph 1.3.12 Cllr Paul White commented that build to rent properties are not affordable for many people in Wandsworth and should not be encouraged.

In relation to paragraph 1.3.15 Cllr Paul White responded that on top of those options there should be greater rental options and control passed to renters regarding service charges and management and three year rental options should be offered as well as extended Landlord Licensing.

### **Council Response**

Local Plan Policy LP 25 (Affordable Housing) proposes that 50% of affordable housing provision should be for low-cost rented products.

Local Plan Policy LP 25 (Affordable Housing) proposes that the affordable housing must equate to at least: 35% on individual sites outside of the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB OA); 15% on individual sites within the VNEB OA; 50% for public sector land on individual sites outside the VNEB OA where there is no portfolio agreement with the Mayor; and, 50% in Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites where the inclusion of residential uses is considered appropriate in accordance with the emerging London Plan Policy E7 (where the scheme would result in a net loss of industrial capacity).

Local Plan policy LP 32 (Build to Rent) requires that Build to Rent schemes provide on-site affordable housing, in line with the threshold approach set out in the emerging London Plan. The tenure of the affordable housing delivered as part of the development will be required to be London Affordable Rent (50%) and London Living Rent (50%). This measure will help in increasing the affordability of Build to Rent sector.

Local Plan policy LP 32 (Build to Rent) requires that Build to Rent schemes are delivered in line with the approach set out in the London Plan. When delivered in line with the emerging London Plan Policy H11, Build to Rent housing: delivers a better quality of rental product that is professionally managed; provides opportunities for longer term tenancies; and, provides certainty about the rent for the length of the tenancy and includes a clear basis for any increases.

**Question 17 To encourage greater provision of purpose built private rented schemes/Build to Rent accommodation should Wandsworth:**

Cllr Paul White commented that rent should be calculated based on 1/3 of an individual's wage not the local average rent. Restrict rent increases to inflation only during tenancy.

Cllr Peter Carpenter, Labour Party responded that WBC should augment the London Plan Policy to encourage BtR in particular locations and restrict it elsewhere. Innova Investments does not see the need for a local policy for build to rent. London Plan policy is sufficiently flexible to allow the product to respond to market demands as necessary. Wandsworth Society responded that the Council should concentrate on providing social housing, relying on the GLA's strategic target as specified in the emerging London Plan.

**Council Response**

Local Plan Policy LP 32 (Build to Rent) requires that Build to Rent schemes provide on-site affordable housing, in line with the threshold approach set out in the emerging London Plan. The tenure of the affordable housing delivered as part of the development will be required to be London Affordable Rent (50%) and London Living Rent (50%). This means that rents for affordable units will help in increasing the affordability of Build to Rent sector.

Local Plan Policy LP 32 (Build to Rent) does not propose to limit Build to Rent schemes to particular locations as there is no clear rationale why this should be the case.

**Question 18 What locations in the borough do you consider as appropriate locations in Wandsworth for Build to Rent developments?**

Mrs Laura Fletcher-Gray answered locations with PTAL rating 4 or above. Innova Investments responded that existing town centres and locations close to good public transport networks are the preferred locations for BtR developments. Delivering these schemes at a density necessary to ensure high quality development that achieve the critical mass to offering a wider range of on-site services and management that will make the product attractive.

Cllr Peter Carpenter of the Labour Party responded that the locations will be dependent on the demographics likely to make use of the development.

The Wandsworth Society and Clapham Junction Action Group responded that York Road developments and the Winstanley York regeneration projects are designated locations for such developments.

**Council Response**

Comments noted. Local Plan policy LP 32 (Build to Rent) is aligned with the London Plan.

London Plan Policy H11 does not propose to direct BtR developments to locations with high PTAL rating; however, it says that 'to qualify as a Build to Rent scheme, the development, or block or phase within the development, has at least 50 units'. As such, BtR developments will naturally be directed to locations with good levels of accessibility to public transport.

**Question 19 Is there anything else the Council should do to support the Build to Rent sector?**

Mrs Laura Fletcher-Gray suggested the Council take into account Build to Rent design requirements, as these differ to private sale. Battersea Society commented that the Council should commission a study regarding Build to Rent to ensure they are viable for lower income groups. Labour Group responded that the Council should stop BTR and focus on council housing. The GLA answered that the Council should consider the London Plan Policy H13 and take a positive and flexible approach to Build to Rent

In relation to paragraph 1.3.18 Cllr Paul White commented all new homes should be "Lifetime Homes" thus cutting down on the need to adapt homes later in the home's life. A lodging scheme should be pushed to take on care leavers to ensure their first experience of life outside a care home is positive.

Negotiated stopping should be introduced to ensure travellers have spaces to settle temporarily. New developments with "meanwhile uses" should be used for this. Community Land Trusts, Co-Operatives and co-housing, inter-generational living (for the elderly) should be encouraged where affordable levels will be very high, democratic ownership is encouraged and decrease loneliness and community/generational interface is encouraged. The medical and mental needs of service personal must be clearly understood by accessing service-based charities to ensure service personal are given adequate housing. Support services should be attuned and on-hand to sustain tenancies for ex-rough-sleepers to keep them in sympathetic housing. Developers must be encouraged to build homes that reflect need, so building enough large family homes and making them available at rents that can be afforded.

**Council Response**

Comment Noted. Build to Rent units are contained units that are assessed against the design criteria for residential dwellings in the draft London Plan and any subsequent design code or guidance prepared by the Council.

The Local Housing Needs Assessment identifying a need for Build to Rent products in the borough. The Government and London Mayor both support Build-to-Rent housing. There is no evidence which indicates that the Council should take a more restrictive approach to Build to Rent development.

"Lifetime homes" has been replaced by standards in Part M of the building regulations and this advocates "wheelchair adaptable" dwellings which provide flexibility to adapt to changing mobility needs. The remaining points raised are specific to the Wandsworth's Housing and Homelessness Strategy.

**Question 20 Do you agree that Wandsworth should prepare a policy in line with the mayor's approach that clearly distinguishes between c2 and c3 uses. Please provide reason.**

Cllr Peter Carpenter of Labour Party commented that Wandsworth should prepare a policy in line with the Mayor's approach and residential care homes should be provided. The GLA commented that the London Plan provides for this.

Battersea Society responded yes, given projections of growth in need for each category of provision.

Labour Group commented that Wandsworth need to conduct a study to determine the need for nursing homes and the CCG should be consulted about provision.

TFL Commercial Development and NHS Property Services supported the distinction between C2 and C3 uses to ensure transparency on the type of care permitted under specified use classes.

**Council Response**

The emerging London Plan contains a new, dedicated specialist older person policy (H15) and has identified the annual borough benchmarks for older persons housing (C3) at 120 units. This includes sheltered accommodation, extra care accommodation and residential nursing care accommodation. The Council has undertaken a local assessment of specialist housing need, including residential nursing care accommodation (C2), as part of the Local Housing Needs Assessment. Local Plan policy LP 33 (Specialist Housing for Vulnerable People) sets out that the development of specialist and supported housing will be supported where the accommodation meets an identified need, having regard to the evidence set out in the Council's most up-to-date Local Housing Need Assessment.

**Question 21 Are there any particular demands for supported housing which are not being met?  
Please provide examples in your answer.**

Cllr Paul White commented that co-housing and inter-generational housing would help increase well-being, decrease loneliness and so reduce elderly illness and the need for too many extra sheltered places.

Cllr Peter Carpenter of the Labour Party responded that Wandsworth is lacking in terms of accommodation for students which is putting a strain on family homes. There is also a lack of provision for travellers and gypsies. Finally, disabled access is not fully adapted in most new developments. Battersea Society answered intermediate housing for former armed service personnel and ex-prisoners.

Labour Group would like the Council to encourage Build to Rent so long as there is appropriate genuinely affordable housing. The levels of affordability in the London Plan should be met. Rent should be based on average wages not market prices. Rent increases should be based on inflation.

**Council Response**

Comment Noted. Inter-generational housing cannot be delivered by planning policy.

The local housing need assessment assessed the need for student accommodation. Local Plan Policy LP 30 (Purpose Built Student Accommodation) requires that proposals for Purpose Built Student Accommodation will be supported where the development meets the need for such accommodation as identified in the Wandsworth Local Housing Need Assessment. The building regulations address access for disabled students.

The Council has undertaken a Gypsy and Traveller Accommodation Needs Assessment (2019). It identified that there is currently no evidenced requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough. Nevertheless, should demand exceed supply in the future, the Council will actively explore options to identify an additional site(s), in accordance with Policy LP 34 (Gypsy and Traveller Accommodation).

Local Plan Policy LP 32 (Build to Rent) requires that Build to Rent schemes provide on-site affordable housing, in line with the threshold approach set out in the emerging London Plan. The tenure of the affordable housing delivered as part of the development will be required to be London Affordable Rent (50%) and London Living Rent (50%). This means that rents for affordable units will help in increasing the affordability of Build to Rent sector.

**Question 22 Should the Council continue to support Houses of Multiple Occupancy where they meet or have the potential to meet licensing standards?**

Cllr Paul White commented that standards should be high and the licences provisions well policed with a well resourced council team, that would use the Rogue Landlord's database to keep bad examples out of the mix. New legislation should be accessed to ensure tenants are informed of their rights, including ombudsman and the permissible standards in a home. Landlords should be held to account of this also. The Collective responded that calls for specific policy on large scale purpose built shared living, mirroring policy H18 in the emerging London Plan with a more flexible approach to affordable housing requirements than is set out in the draft London Plan.

Ms Margaret Brett commented that there is a real need for rooms in HMOs and these provide separate accommodation for lower paid residents who cannot afford an individual flat. The Battersea and Wandsworth Society said yes. Cllr Peter Carpenter of the Labour Party and the Labour Group would say yes, where managed appropriately but fringe benefit

**Council Response**

The role of HMOs and the contribution they make to meeting boroughs needs is acknowledged and implemented through supportive planning policy linked to the Housing department's initiative to encourage registration and improvement in standards.

Local Plan Policy LP 31 (Housing with Shared Facilities) is a specific policy on large scale purpose built shared living.

Comments noted. Local Plan policy LP 31 (Housing with Shared Facilities) supports the provision of new HMOs, subject to criteria set out in the policy.

**Question 23 Should the Council continue to seek a proportion of family accommodation units from market units, to meet the needs of larger families to ensure mixed and balanced communities?**

Cllr Peter Carpenter of the Labour Party answered yes, but 5% is too small. It should be at least 10%. Clapham Junction Action Group; Wandsworth Society and the Battersea Society responded yes. Tooting Bec & Broadway Neighbourhood Forum answered yes, consultation shows that the diversity of population mix is highly valued by residents.

Labour Group answered that these minima are defined in terms of what the market will bear in a reasonable way but they do not define top limits. Hence, we get conversions of large Battersea terrace houses into massive properties, buildings in Roehampton for the super-affluent.

Workspace Group responded that seeking greater flexibility and an update to policy to reflect that two bedroom apartments are increasingly seen as family accommodation. Current policy is not considered to reflect current demand across the borough. Cllr Paul White responded that the mix should be altered to meet demand. As families grow so should the mix be more geared to larger families.

Ballymore Group, TR Property Investment Trust commented that the policy on family sized units should be more flexible and the definition of family sized extended to include 2 bedroom homes.

**Council Response**

Local Plan Policy LP 26 (Housing Mix) requires that developments creating 10 or more units have regard to the borough-level indicative proportions for units of different sizes. The policy requires that 15-25% of units are 3 bed, and 5-10% are 4+ bed.

Local Plan policy LP 24 (Provision of New Homes) requires development proposals involving new housing to demonstrate that the use of the building / site has been optimised.

Local Plan policy LP 26 (Housing Mix) says that the dwelling mix will be considered on a site by site basis. The policy considers 3+ bed units as family-sized units.



**Question 24 Should the Council continue to retain the maximum threshold of one bedroom/one person units in new development?**

Cllr Peter Carpenter of the Labour Party answered yes, but 5% is too low. 10% would be more practicable. Innova Investments commented that rather than set a maximum threshold, which may be counter to market demand, the new Local Plan should ensure that development provides a broad mix of private market housing, whether that be market sale or private for rent. Wandsworth Society and Battersea Society answered yes.

The Putney Society commented that family accommodation should be supported off the main roads. Up to 100% one-bedroom units are appropriate for small town centre sites which are often conversions. TR Property Investment Trust responded that calls for policy to be less restrictive. Studios/1person units usually the highest demand in central London locations close to transport.

TFL Commercial Development responded that the policy should be more flexible and take account of individual site demands. Ballymore Group and Workspace Group commented that the policy on family sized units should be more flexible and the definition of family sized extended to include 2 bedroom homes

**Council Response**

Local Plan Policy LP 26 (Housing Mix) gives preference to larger homes, because proposals which provide more than a small proportion of studios are unlikely to contribute to the creation of mixed and balanced communities. Although the increasing proportion of single person households is forecast to continue, this does not necessarily result in a proportionate increase in demand for small studios as many people would like a spare bedroom for visitors or to use as a study/office. However, in a borough such as Wandsworth, where land values and property prices are high, undue restriction against provision of small units may have an impact on affordability. The LHNA (2020) identified that the average monthly cost of a studio flat is £950pcm, as against £1,250pcm for a 1-bedroom dwelling, which is a substantial difference. Taking this into consideration, it is important that applicants are able to respond appropriately to the demand for homes of this size. Therefore, a realistic approach is to allow for a proportion of new developments to contain studios up to a maximum limit. A maximum proportion of studios and 1 bedroom one person units has only been set for market housing as this type of accommodation will not be supported as part of the affordable housing element of a scheme.

**Comments on Supporting Text**

In relation to paragraph 1.3.23 Cllr Paul White commented that space standards in homes should stop declining and sustainability should be central to any building regulations.

**Council Response**

Comments noted. Through the emerging London Plan the GLA has set minimum housing design and accessibility standards as well as standards for the provision of private amenity space for new homes in all London boroughs.

### **Question 25 Should the Council:**

- Retain the current standards of a minimum 10 sqm for non-family flats and 15 sqm amenity space for family sized flats?**
- Propose an alternative standard including distinguishing between family and non- family accommodation?**
- Propose a minimum distance (15 metres) between windows on adjacent properties for new build, and infill development and for extensions to militate against overlooking and provide a degree of spacing between buildings?**

Labour Group questioned whether the insistence on amenity space is always appropriate in highly polluted areas. Ms Margaret Brett responded that amenity space needs to be considered more sincerely.

Cllr Paul White and Cllr Peter Carpenter of the Labour Party commented that the space for family accommodation should remain, overlooking should be changed from 15m to 18m and separation distances should be maintained. Enable Leisure and Culture supported the local standards of a minimum 10 sqm for non-family flats and 15 sqm amenity space for family sized flats. These standards should not be reduced further and we would support an increase in the local standards. The Putney Society responded that 10 sqm can be difficult to achieve in the upper floors of conversions, particularly where overlooking is an issue preventing use of balconies. We agree that family units need at least 15sqm. The 15m 'overlooking' distance is supported.

Battersea Society commented that current space standards are not ideal and need to be improved. TR Property Investment Trust; Workspace Group commented that the current space standards are too high, the definition of family sized needs to be clearer and innovative design can solve many issues in terms of overlooking and privacy and the policy on this should be more flexible.

Ballymore Group are against the Council setting prescriptive parameters and would instead encourage the Council to use the indices as guidance to assist with review of quality and retain flexibility. Wandsworth Society and Clapham Junction Action Group responded that Wandsworth need to use the London play guidance as a minimum and they are encouraged to increase these standards as it will improve the wellbeing of the whole borough.

### **Council Response**

There are noted benefits to health and wellbeing provided by amenity space, this type of space can also contribute to sustainability objectives (i.e. mitigating flood risk, improving air quality etc).

Local Plan Policy LP 2 (General Development Principles) requires that development proposals avoid unacceptable levels of overlooking. It notes that privacy is a key consideration and new development should not cause significant or unreasonable harm in terms of overlooking. Balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. Privacy of gardens and courtyards is also important. However, public spaces and communal amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.

Local Plan Policy LP 29 (Housing Standards) is aligned with the London Plan in terms of the requirements for external private amenity space. The Council will continue to apply the Mayors space standards as set out in the emerging London Plan which are considered to be adequate

minimum standards. There is also a need to provide amenity space noting its important role in health wellbeing and social interaction.

Local Plan policy LP 19 (Play Space) sets out an approach to play space provision. It indicates that the total amount of play space required can be calculated using the Council's Population Yield Calculator. More detail on play space requirements can be found in the Council's Planning Obligations SPD. Developments should consult with children and young people as part of any play space proposal to ensure adequate consultation has been completed. For a detailed list of play provision facilities see the Mayor of London Shaping Neighbourhoods: Play and Informal Recreation Table 4.7 Play provision in new developments.

**Question 26 Do you have any other comments on housing quality or standards that should be reflected in planning policy?**

Cllr Paul White and Cllr Peter Carpenter of the Labour Party responded that the Council should mandate the highest levels of energy efficiency. Labour Group thinks that the Council should always automatically apply the highest possible environmental standards.

Battersea Society commented that they would like to see individual private storage units designed into the basements of new developments to provide on-site storage for residents - a practice common elsewhere in Europe.

The Putney Society responded that most requirements are now covered by the Nationally Adopted Space Standards and requirements of the London Plan. Wandsworth don't need to add to these. The GLA commented that the new Local Plan should be in line with London Plan guidance.

**Council Response**

The draft Local Plan adopts and extends the carbon emission mitigation requirements set out within the emerging London Plan, which already exceed national standards. In addition to the emerging London Plan standards, new residential buildings will now be required to achieve a minimum on-site reduction of 35%; ensuring that the increased Mayoral requirements for small site housing delivery will contribute to climate mitigation in the borough. This is supported by a new policy requirement for the post-construction monitoring of development to ensure compliance with agreed outputs. The Local Plan also introduces recognition for various recognised standards for residential development, including the BRE Home Quality Mark and Passivhaus.

Storage space standards are set out in the London Plan accommodation standards. Storage of this kind is not prohibited by policy and would be supported.

Comments noted.

**Question 27 Should the Council's policies further control, or be more permissive towards extensions?**

Cllr Paul White commented that green space should be maintained, too much is being lost. Current standards should be adhered to. Ms Margaret Brett commented that the Council should prevent the paving or decking over the whole of the rear garden. Retention of gardens encourages biodiversity and also provides natural drainage.

Labour Group commented that the current policies largely work, and that neither more nor less permissive ones are required except for basements. Cllr Peter Carpenter of the Labour Party answered that the current policy maintains a good balance.

The Wandsworth Society and the Battersea Society commented that there should be further control to extensions as they have a number of detrimental effects, but no additional housing added to the Council's housing stock. Ms Susan Jones agreed with them that policies should further control extensions.

The Putney Society commented that there's no point in setting more restrictive standards than the Permitted Development allowances. The GLA answered that housing quality and design standards beyond those set out in the emerging London Plan should be considered carefully so that they do not undermine the delivery of small housing sites. These standards should be set out in the context of design codes which support the delivery of small sites.

**Council Response**

Local Plan Policy LP 6 (Basements and Subterranean Developments) recognises that while basements may not have a detrimental impact on the openness of an area, they can introduce a degree of artificiality into the garden area and restrict the range of trees and other planting. Therefore, this policy requires the retention of at least half of each garden to enable natural landscapes and the character to be maintained. In addition, this enables the treatment of surface water as close to its source as possible by retaining the infiltration capacity of the un-excavated area of the garden, thus ensuring that proposals do not increase surface water flows onto adjoining properties.

Many extensions, in particular rear extensions, are classified as permitted development. Permitted development introduced by the general permitted development order 2016 allows householders to improve and extend their homes (within certain parameters) without the need to apply for planning permission where that would be out of proportion with the impact of works carried out. Therefore, the Council is limited in what control it has over some forms of extensions. Further restrictions do apply to development in conservation areas, in particular the areas covered by Article 4 directions in Wandsworth.

Comments noted.

**Question 28 Should the Council retain current policy requiring at least 50% of garden space to remain after extensions?**

Ms Susan Jones, Labour Group responded yes. Cllr Peter Carpenter of the Labour Party commented yes, to preserve outdoor space. Battersea Society responded yes, and this should not be above a basement. Enable Leisure and Culture responded yes, the Council should examine the cumulative impact of loss of back garden on biodiversity.

Cllr Paul White commented 75% of the garden (at least) should be maintained. Ms Margaret Brett commented that the Council should definitely not allow more than 50% of the garden space to be built on. This includes both extensions and garden rooms. We need to retain as much green space as possible.

**Council Response**

Permitted development rights set out requirements to not allow more than 50% of the garden space to be built on.

**Question 29 Should set a minimum standard for front garden space to remain after extensions? If so what do you think this should be and how could this be justified?**

Cllr Peter Carpenter of the Labour Party answered no, but it would be desirable to maintain existing building lines. Cllr Paul White commented that front garden space should be maintained, with approvals for car parking resisted. Ms Margaret Brett commented that we should not be allowing front gardens to be built on or over. We need to preserve and protect the front garden space. Our local Green the Grid initiative has tried to reclaim front gardens and remove impervious paving.

Battersea Society responded yes, the standard will vary within areas given that many properties in Battersea have very small front areas. It can be justified on grounds of avoiding damage to the streetscape and the danger of flooding. Labour Group foresees definitional problems, but it does not appear to be a problem.

**Council Response**

Local Plan Policy LP 5 (Residential Extensions and Alterations) requires that the provision of lightwells would retain at least 50% of the original front garden depth, and within conservation areas ensure that a minimum depth of 2m of front garden is retained.

Planning permission is not required if a new or replacement driveway of any size uses permeable (or porous) surfacing which allows water to drain through, such as gravel, permeable concrete block paving or porous asphalt, or if the rainwater is directed to a lawn or border to drain naturally. If the surface to be covered is more than five square metres planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area. Most of the borough's front garden fall below this level so the efficacy of a policy solution is therefore very limited.



### **Comments on Supporting Text**

In relation to paragraph 1.3.25 Thames Water commented that Thames Water request that basement development have a suitable flood prevention device to avoid sewer flooding in times of storm conditions.

### **Council Response**

Noted, the Councils existing Housing SPD requires that all basement developments must incorporate a positive pumped device or other suitable flood prevention device to the development to avoid the risk of sewage backflow and sewer flooding. Local Plan LP12 Water and Flooding states that all new basements with a waste outlet (such as toilets, bathrooms, utility rooms) will need to be protected from sewer flooding through the installation of a suitable (positively) pumped device, which will need to be shown in drawings submitted with a planning application.

**Question 30 Should the Council continue to follow the existing approach which requires that no more than half of the rear garden can be developed below ground?**

Cllr Peter Carpenter of the Labour Party asked what about the front garden? He really can't think of a good reason to restrict such development. Cllr Paul White responded that there are technical reasons why basements are dangerous and not sustainable and these reasons should be reviewed and inform policy. Enable Leisure and Culture, The Battersea Society, Ms Margaret Brett, Ms Susan Jones answered yes.

**Council Response**

Local Plan Policy LP 6 (Basements and Subterranean Developments) recognises that while basements may not have a detrimental impact on the openness of an area, they can introduce a degree of artificiality into the garden area and restrict the range of trees and other planting. Therefore, this policy requires the retention of at least half of each garden to enable natural landscapes and the character to be maintained. In addition, this enables the treatment of surface water as close to its source as possible by retaining the infiltration capacity of the un-excavated area of the garden, thus ensuring that proposals do not increase surface water flows onto adjoining properties.

**Question 31 Would you support the formation of policy to implement further restrictions on basement development?**

Labour Group answered yes, the Council should explore what other boroughs have done with regard to basement development. Ms Susan Jones and Ms Margaret Brett answered yes, in light of climate change, of what we do below ground. Basements can destabilise adjoining properties, particularly those built on clay.

Cllr Peter Carpenter of the Labour Party commented it would be sensible to develop a policy restricting multi-level basements. These can have an adverse effect on groundwater. Battersea Society answered yes, they would support the formation of policy to implement further restrictions on basement development.

The Putney Society commented that basements policy in Housing SPD 2016 works well and any new policies should forbid multilevel basements. The GLA commented that support for the formation of a Wandsworth policy to protect against the negative impacts of large-scale basement development beneath existing buildings.

**Council Response**

Local Plan Policy LP 6 (Basements and Subterranean Developments) recognises that while basements may not have a detrimental impact on the openness of an area, they can introduce a degree of artificiality into the garden area and restrict the range of trees and other planting. Therefore, this policy requires the retention of at least half of each garden to enable natural landscapes and the character to be maintained. In addition, this enables the treatment of surface water as close to its source as possible by retaining the infiltration capacity of the un-excavated area of the garden, thus ensuring that proposals do not increase surface water flows onto adjoining properties.

High Court has now clarified that a basement extension under a house is permitted development right as long as it is only one storey; does not extend more than 3 metres beyond the back wall of the house; and at least seven metres must remain between the end of the resulting basement and the boundary of any neighbour opposite. Basement developments are governed by separate Building Regulations which cover areas such as underpinning and foundation work (where appropriate), fire escape routes, ventilation, ceiling height, damp proofing, electrical wiring and water supplies.

#### 4.4. Employment and Economic Development

The consultation document allows for **general comments** on the issue of employment and economic development. CBRE notes that Locally Significant Industrial Areas (LSIA) designations are too rigid and policies are needed to be more permissive of other use classes. Mixed uses should be allowed on LSIA designations. Pressure from housing and reduced office supply in the borough puts pressure on mixed use land. Industrial LSIA designation should be considered for industrial at base with offices and residential above. The Battersea Society wrote to say that the Plan should include more proposals for intensification of Falcon Lane. The Council should pursue Network Rail to advance the redevelopment of Clapham Junction. They agreed with Mr Evershed's comment that a broader mix of uses should be allowed in LSIA designations. Pressure from housing and reduced office supply in the borough puts pressure on mixed use land. Industrial LSIA designation should be considered for industrial at the base of developments with offices and residential above. The GLA commented that Wandsworth's Local Plan should set out clear policies as to how and where additional industrial capacity will be delivered. Wandsworth should investigate whether there is potential for surplus out of centre retail floorspace to be converted to industrial floorspace.

#### **Council Response**

The Local Plan continues to protect Locally Significant Industrial Uses (LSIAs), as part of a strategic reservoir of industrial land, for identified industrial uses only. This is based on the evidence identified within the borough's Employment Land and Premises Study (ELPS 2020). The Local Plan identifies areas of former industrial land and part of the Queenstown Road, Battersea Strategic Industrial Location (SIL) as appropriate for mixed-use redevelopment, where this includes reprovided or intensified industrial uses, and furthers the borough's other strategic priorities, including the delivery of housing and office floorspace. Further information is included in the response to Question 32, below.

The Council is supportive of the redevelopment of Clapham Junction Station, which forms the key 'anchor for change' as part of a more detailed Area Strategy for Clapham Junction and the York Road/ Winstanley Regeneration Area. The Strategy seeks to capitalise on the area's excellent existing and potential public transport connectivity to catalyse growth and regeneration focusing on delivering new homes and creating jobs. Both this site and land around Falcon Lane are taken forward as Site Allocations within the draft Local Plan.

### **Question 32 What locations do you consider appropriate for Industrial uses in Wandsworth?**

Cllr Peter Carpenter suggested the intensification along the rail transport corridor into Waterloo and Victoria. The Battersea Society commented that they would like to retain and protect industrial uses and intensify them. The Queenstown Road SIL, together with the Culvert Place sites should be protected, and opportunities sought to intensify their use. The use of railway arches including those in Cranleigh Mews should also be promoted. They expressed concerned that a Network Rail consultation on the use of railway arches at Clapham Junction appeared to value high market rents over social infrastructure and local employment too.

Gavin Scillitoe of BAF Graphics noted that the Lydden Road LSIA is well placed to support industrial uses in the local economy and that the Council should support the redevelopment of the existing industrial stock. Savills suggested that the draft Local Plan aligns with the emerging London Plan Policy E5, which states that in their Development Plans, boroughs should explore opportunities to intensify and make more efficient use of land in SIL, particularly through the principles set out in emerging London Plan Policy E7 which promotes intensification, co-location and substitution. Adam Wilkinson of Boyer Planning considered the Lydden Road LSIA appropriate for industrial use and a flexible policy approach should be implemented to allow for commercially viable mixed use development.

Workspace Group and TR Property Investment Trust highlighted that the Employment and Industry Document provides all the necessary information. Travis Perkins Properties commented that planning policies should be worded to facilitate industrial uses across the borough subject to design and other development management considerations. Philip Whyte of the Wandsworth Society suggested that industrial land should be retained for industrial use, but that some need to be modernised.

### **Council Response**

The Local Plan seeks to continue the protection and promotion of industrial uses within the borough's strategic reservoir of industrial land, which is formed of land designated as Strategic Industrial Locations (SIL) and Locally Significant Industrial Areas (LSIAs). In addition to the existing Queenstown Road, Battersea SIL (which includes sites in Culvert Place), the Council are proposing to take forward the emerging London Plan's re-designation of the Summerstown LSIA as part of the 'North Wimbledon / Garratt Business Park (Summerstown)' SIL (which is shared between Merton and Wandsworth boroughs). This designation will enhance the protection of the industrial uses within the site.

Within these locations, the redevelopment of sites must provide full replacement of existing industrial floorspace; and the intensification of sites for industrial purposes is encouraged, including through the modernisation of premises. This is set out within Local Plan Policy LP 37 (Managing Land for Industry and Distribution). This policy approach is informed by the Employment Land and Premises Study (ELPS) 2020, which forecasts that there is a net requirement for 8.6 hectares of industrial land between 2019 and 2034, predominantly driven by an increased demand for storage and distribution uses (falling within Use Class B8). This increase in demand for industrial land contrasts with the recent and pipeline loss in supply as identified within the Council's monitoring reports (albeit that much of this is within the context of the substantial and strategic redevelopment of the Vauxhall Nine Elms Battersea Opportunity Area). The importance of retaining and protecting the borough's existing remaining industrial land within this capacity is therefore paramount.

Building on the policy approach of the 'Industrial Business Park' established within the current Local Plan (Employment and Industry Document, 2018), the Council has identified an area of the Queenstown Road, Battersea SIL as having the potential to be transformed into a creative and technological cluster: the Battersea Design and Technology Quarter. The concept is a strategic decision which seeks to leverage the investment in the wider VNEB OA and to build upon the area's existing creative economy to deliver intensified economic uses: by bringing new SME jobs to the area which complement the anticipated digital cluster at the Battersea Power Station Development; and by promoting the intensification of the existing industrial activities within the SIL. Redevelopment within this area must reinforce the area's SIL designation and increase the amount of industrial floorspace, however they may also provide office floorspace targeted at SMEs on the upper floors of the buildings. An economic appraisal and design framework has been undertaken by consultants We Made That in support of the Council's ambitions.

Elsewhere within the strategic reservoir, non-industrial uses (including residential) will not be permitted, other than where they are ancillary to the primary industrial function of the development or where they are small scale and provide services to people / businesses working in the SILs and LSIA's. The nature and by-products of industrial activities, which can include the generation of noise, odours, dust, emissions, traffic (including HGVs) and the requirement for operation across a 24 hour period, can often result in conflicts being raised with other uses, and in particular residential. The introduction of non-industrial uses within the borough's other identified industrial areas is considered to potentially harm their operation and flexibility to accommodate different uses in the long term, and given the scale and types (e.g. storage and distribution) of the forecast industrial demand this is not considered appropriate. This approach is informed by the ELPS 2020.

The Local Plan does, however, identify a number of locations outside of the strategic reservoir where existing industrial uses are to be retained and new industrial uses are promoted. These locations include Economic Use Intensification Areas (EUIAs), Economic Use Protection Areas (EUPAs), Focal Points of Activity, and other non-designated industrial land. Unlike within the strategic reservoir, the mixed use redevelopment of other uses, including residential, alongside industrial provision within these locations is considered to be appropriate. This helps to provide additional industrial capacity, while addressing the borough's other strategic needs in the right locations. In particular, the mixed-use redevelopment of former industrial land around Wandsworth Town will seek to promote provision of industrial uses (see the Wandsworth Town Area Strategy and draft Policy LP 38, Mixed Use Economic Development) while addressing the Council's wider ambitions for the centre and surrounding areas. To ensure that proposals for mixed use economic development do not negatively impact on the long term viability and effective operation of the industrial uses (whether existing or included within that development), policies require that consideration is given to access arrangements, layout and design, the ability to operate on a 24 hour basis, and the compatibility with existing and potential uses within the wider area, alongside other design considerations. More information is included in draft Policy LP 40 (Requirements for New Economic Development).

Where railway arches, viaducts and adjacent land fall within the borough's identified 'strategic reservoir of industrial land', industrial uses are protected and intensification, where possible, is encouraged. As outlined above, other uses will not be permitted in these locations. Elsewhere – including in Cranleigh Mews – the loss of existing industrial uses in railway arches will be resisted and new industrial uses promoted, with the exception of certain undesirable industrial uses (mostly falling within Class B2) where these are located within town centres and in the railway arches adjacent to the New Covent Garden Market, which are protected in a wholesale retail capacity in order to serve the operation of the market. In the Central Activities Zone (CAZ) and the town

centres, a greater flexibility of uses is permitted, which recognises both the vitality and viability that these spaces can bring as part of a town centre revitalisation strategy; but also the challenges that certain economic uses can face due to the design limitations of these sites (vacancy rates are higher for these premises than is typical for small/medium industrial premises). See Local Plan Policy LP 39 (Railway Arches) for further detail.

It is noted that from 1 September 2020, the Government has introduced significant changes to the Use Classes Order (UCO), with the introduction of the new Use Class E, which collates commercial, business and service uses. For the purposes of economic land: Use Classes B1a (office other than a use within Class A2 – financial and professional services, not including medical); B1b (Research and development of products or processes); and B1c (industrial processes which could be carried out in any residential area without causing detriment to the amenity of the area) have all been removed and incorporated within Use Class E, alongside other uses. Changes of use within the same use class are not considered to be development and therefore do not require planning permission, nor does the Local Planning Authority have the ability to exercise control over such changes of use. It is recognised that this could potentially compromise the ability of the Council to protect existing industrial floorspace (that formerly fell within use Class B1c) in line with the ambitions of the Local Plan, as well as with the requirements of paragraphs 80 and 81 of the NPPF. That notwithstanding, given the need for industrial floorspace identified within the borough's ELPS 2020, and reflecting the strategic recommendations of that document, the Council continues to take a proactive approach to the provision of industrial floorspace within the Local Plan where policies have the ability to influence development (e.g. where permission is required).

**Question 33 What types of employment do you think have the potential to grow in Wandsworth over the next 15 years and what conditions are needed to generate and retain jobs locally?**

Cllr Graeme Henderson and Cllr Jo Rigby commented that industrial land should be retained for industrial uses but some facilities need to be modernised. Cllr Peter Carpenter identified office and light industrial, hospitality, healthcare, education and leisure as growth sectors. The Battersea Society noted that ICT and Media sectors, creative industries are employment areas that have the potential for growth in Wandsworth. Affordable spaces for start-ups are also required.

Gavin Scillitoe of BAF Graphics answered that the quality and availability of floorspace needs to be improved if businesses like his are to grow. Tooting Bec & Broadway Neighbourhood Forum commented that sustainable employment requires affordable housing for a local workforce, and 'liveable' neighbourhoods.

Iain Buzza of Savills commented that office use is moving to a more flexible approach. Policies should move to a more flexible approach and should not have restrictions on specific uses within the broader category of employment. Retail is moving towards a more experience-based landscape. Wandsworth need a flexible approach to cater for start-up and SME to make sure the optimal conditions and opportunities are available. Policy should not be restrictive on employment uses to deliver jobs for local people as Wandsworth is a diverse and well-connected borough. Adam Wilkinson of Boyer Planning answered that 30-54 Lydden Road is constrained by policies to respond to market demands and provide objectives of the Local Plan and emerging London Plan. Innova Investments answered that Wandsworth has potential to capture further office growth. Clapham Junction needs to be upgraded for capacity problems. Retail and leisure services will require to increase on site to accommodate further office and residential development as part of the station redevelopment.

Putney High Street Development commented that employment policies should allow a loss in existing office floorspace in instances where the existing office floorspace is of low quality and or not lettable. The policy should be flexible to accommodate a range of office tenants and meet modern day standards, the loss of any office space should be considered in the context of providing high quality floorspace. Enable Leisure and Culture commented the Wandsworth Local Plan Employment and Industry Document 2017 drew attention to the pressure impacting on the affordability of workspaces catering for small businesses and the creative sector, including artist studios and maker space. This is still a significant issue and needs support from across the Council to minimise its impact.

Covent Garden Market Authority answered that flexibility is required on the floorspace at the market. Travis Perkins Properties commented that planning policies should protect builder merchants.

Port of London Authority commented that safeguarded wharfs will grow as the construction industry continues to use them for the delivery of materials.

**Council Response**

The economic land policies set out within the Council's Local Plan are informed by the Employment Land and Premises Study (ELPS) 2020, which was undertaken by AECOM. A key part of the study is the assessment of future employment floorspace and land requirements over the next 15 years, informed by a range of future employment growth scenarios, including one based on the latest employment forecasts from Experian; a scenario aligned to GLA Economics' employment projections



for Wandsworth; and a trend-based scenario. The figures in the study were ultimately founded on a hybrid approach of the former two, and the growth sectors identified by the Study include: Health, Residential Care & Social Work, Accommodation & Food Services, Professional Services and Land Transport, Storage & Post. These are generally well aligned with the sectors identified in the 'Issues' consultation response. The Local Plan also identifies a number of sectors where the borough demonstrates, or has the potential to develop, local specialisation, including the cultural, creative, digital, and food and drink industries. The Plan seeks to accommodate these sectors as part of the borough's overall economic growth strategy. This strategy is set out by the National Planning Policy Framework (NPPF), which requires local authorities to positively and proactively encourages sustainable economic growth, identifying sites and inward investment opportunities in order to meet anticipated needs over the plan period. Based on the above forecasting, the ELPS 2020 has identified that there is a net requirement of 8.6 hectares of industrial land up to 2034, and for an additional 22,500 sqm of office floorspace in the local / sub-regional office market in that same timeframe. As such, the Local Plan plans for, and require, specific uses (e.g. office, industrial) within identified sustainable locations. For the same reason, the loss of existing office space is not permitted, other than where this has been demonstrated to be the case through robust marketing requirements.

Whilst broader uses are required, the Plan embraces flexibility in design and approach within those uses. Local Plan Policy LP 40 (Requirements for New Economic Development) requires "a high standard of workspace which is capable of being used flexibly", and Local Plan Policy LP 36 (Promoting and Protecting Offices) encourages the provision of 'flexible and touchdown space' within town centres, where a broader approach to retail and leisure is also promoted (see Question 41). The provision of such flexible – and affordable – workspace is required to support the borough's thriving SME sector and start-ups (see Question 34 for more information on this issue).

The Local Plan places a greater emphasis on area-based strategies, and the development of these through the principles of people first, placemaking and smart growth. An area strategy has been developed for Clapham Junction, which takes the redevelopment of Clapham Junction station as a key 'anchor for change', and proposed increased provision of office floorspace through the mixed-use redevelopment of this (and other) sites.

The use of wharves within the borough will be safeguarded for the transshipment of freight, including waste and aggregates, and for freight-related activities. The loss of safeguarded wharves will not be permitted unless it is demonstrated that the wharf is no longer viable nor capable of being made viable for cargo handling, in accordance with the emerging London Plan Policy. This is set out in Local Plan Policy LP 43 (Protected Wharves).

### **Question 34 What else should the Local Plan consider to help SME sector and start-up businesses?**

Labour Group answered the provision of serviced facilities and ensure high capacity WiFi networks. They also identified the importance of consulting SMEs directly. Cllr Peter Carpenter answered providing incubator accommodation for start-up enterprises and flexible workspace. Mr Mike Potter of Tooting & Bec Neighbourhood Forum answered a policy to encourage small, flexible business units within larger developments / buildings. The Battersea Society commented that the Local Plan should encourage larger companies to provide apprenticeship and resist demolition of small industrial estates.

Gavin Scillitoe of BAF Graphics answered that the Local Plan should encourage the redevelopment of industrial floorspace for mixed use development. Ipsus Development Company responded there is a need for SME space particularly in industrial uses. Currently the Local Plan is precluding businesses from growing and therefore leaving the borough. There needs to be more flexible policy. Enable Leisure and Culture answered there needs to be more support towards establishing and sustaining incubators.

Clapham Junction Action Group commented that office space should not be neglected at Clapham Junction where it has a high requirement for such a use. Co-working spaces should be promoted at Clapham Junction also. Travis Perkins Properties answered SME businesses should be protected.

#### **Council Response**

The Local Plan takes a proactive approach to providing suitable, flexible floorspace for the borough's SME sector and to support start up businesses. Such businesses form the overwhelming majority of Wandsworth's businesses: 93.6% of all the businesses in the borough are 'micro' businesses employing fewer than 10 people; and 98.8% employ less than 50 people (Wandsworth's Economic Land and Premises Study, 2020).

Local Plan Policy LP 41 (Affordable, Flexible and Managed Workspace) requires that all development which provides economic floorspace should contribute to the provision of affordable, flexible and managed workspace, in perpetuity, and which will be secured through conditions or s106 planning obligations. Where development provides less than 1000 sqm of economic floorspace, it is expected that a range of unit sizes will be provided, ensuring the borough maintains a sufficient provision to meet the needs of smaller enterprises. For larger developments (over 1000 sqm of economic floorspace), either a proportion of 'open workspace' equivalent to 10% of the gross floorspace must be provided, which includes features that minimise overhead and upfront investment costs and provide business support for micro- and small-businesses; or this floorspace is required to be provided at an affordable rent in perpetuity. The Plan takes a variable spatial approach to affordable provision, requiring that floorspace in the Wandle Valley provides a rent of 25% less than the prevailing market rate for comparable premises; and of 50% less than this value within the VNEB OA.

This requirement for dedicated affordable provision is supported by spatial policies. Local Plan Policy LP 36 (Promoting and Protecting Offices) takes a identifies preferential locations for the development of workspace suitable for SMEs requiring office floorspace, directing these to town centre locations (in accordance with the NPPF), where co-working spaces and 'touchdown' spaces are particularly sought. Local Plan Policy LP 37 (Managing Land for Industry and Distribution), in turn, identifies and protects locations that specifically provide for SMEs working in an industrial capacity. As the ELPS anticipates that demand for both office and industrial floorspace is likely to exceed capacity within town centres and the borough's strategic reservoir, respectively, further suitable locations for mixed use redevelopment (in which economic uses are provided alongside other uses,

including residential) are identified in Local Plan Policy LP 38 (Mixed Use Development on Economic Land).

Building on the policy approach of the 'Industrial Business Park' established within the current Local Plan (Employment and Industry Document, 2018), the Council has identified an area of the Queenstown Road, Battersea SIL as having the potential to be transformed into a creative and technological cluster. The concept seeks to leverage the investment in the wider VNEB OA and to build upon the area's existing creative economy to deliver intensified economic uses: by bringing new SME jobs to the area which complement the anticipated digital cluster at the Battersea Power Station Development; and by promoting the intensification of the existing industrial activities within the SIL. Redevelopment within this area must reinforce the area's SIL designation and increase the amount of industrial floorspace, however they may also provide office floorspace targeted at SMEs on the upper floors of the buildings. In support of the concept, consultants We Made That were commissioned to undertake an economic appraisal of the area, and to provide guidance on a physical development framework that would support the Council's ambitions.

The Local Plan also promotes the improvement of infrastructure for digital connectivity in Local Plan Policy LP 23 (Utilities and Digital Connectivity Infrastructure).

**Question 35 Is the current policy on affordable workspace sufficient to provide affordable workspace that can meet the needs of local businesses at all stages in their development?**

Labour Group responded that the new Battersea Arts Centre workspace would appear to be the right kind of facility, but they question how successful it has been. They suggest the Council should make more such space available through development control policies. Cllr Peter Carpenter of the Labour Party commented that affordable workspace is similar to affordable housing and Wandsworth should have specific policies on the proportion of workspace that should be affordable. Covent Garden Market Authority, on behalf of the Covent Garden Market Authority, answered that the Council should ensure employment floorspace is not lost, as the overall supply of this provision is a key determinate of the affordability of workspace.

Iain Buzza from Savills responded that affordability can be achieved through a range of measures including the product itself and flexible terms of occupation and that affordable workspace should be subject to viability. Workspace Group and TR Proport Investment Trust commented that the policy could better explain what is affordable workspace and what constitutes comparable sites. The GLA answered that the Local Plan is not clear regarding its approach to affordable workspace as it currently has two policies covering the same issue.

**Council Response**

Local Plan Policy LP 41 (Affordable, Flexible and Managed Workspace) requires that all development which provides economic floorspace should contribute to the provision of affordable, flexible and managed workspace, in perpetuity, and this will be secured through conditions or s106 planning obligations. Where development provides less than 1000 sqm of economic floorspace, it is expected that a range of unit sizes will be provided, ensuring the borough maintains a sufficient provision to meet the needs of smaller enterprises. For larger developments (over 1000 sqm of economic floorspace), the Plan provides flexibility in how this requirement is realised. One option requires the applicant to provide a proportion of 'open workspace' equivalent to 10% of the gross floorspace (or a minimum of 400m if lower than this value) must be provided, which includes features that minimise overhead and upfront investment costs and provide business support for micro- and small-businesses. Open workspaces are defined as places where businesses and professionals share space, facilities, and/or specialist equipment, in order to reduce costs. Examples include co-working spaces, incubators, artists' studios and maker-spaces. Alternatively, this same proportion of floorspace (10%) can be provided at an affordable rent in perpetuity. The Local Plan takes a variable spatial approach to affordable provision, subject to scheme viability. More information on this aspect is included in response to question 36.

Managed or Open workspace providers have different business models and seek developments of different sizes, from small units providing desk space to very large developments providing a broad range of office sizes or large floorplate co-working space. These features vary depending on the business model of the workspace provider and the sector they function within, and therefore it is difficult to identify a single definition, however the Local Plan identifies features which they will likely provide, including some or all of the following:

- Business support, advice and mentoring.
- Networking spaces and events.
- Direct access to financial institutions and investors.
- Shared spaces, facilities, and/or specialist equipment.
- Pay-as-you-go rent models.

- Flexible leasing arrangements giving access to both short-term and long term contracts depending on business needs.
- Flexible spaces with easily removable partition walls or spaces of different sizes that can be modified as businesses grow or consolidate and allow for peak-time operation.
- Cross-subsidy from more established businesses to emerging firms or those operating in low-income sectors such as the cultural industry or third sector.
- Direct support or rent subsidies for businesses that provide or undertake volunteering for the local community.

These features combine to give more certainty, diminish risk, provide financial flexibility, encourage entrepreneurialism and reduce overhead and investment costs for emerging and growing businesses.

**Question 36 Should the Local Plan set out site specific locations where affordable workspace should be provided or adopt a more general policy approach?**

Cllr Peter Carpenter of the Labour Party, the Labour Party, Ms Susan Jones, and Covent Garden Market Authority responded that a general policy would be preferable.

The Putney Society answered that the only way to get this, as with housing, is to require a proportion of all workspace developments to be affordable, offset elsewhere case by case if appropriate. Workspace Group commented that affordable workspace should be flexible and based on viability.

Gavin Scillitoe of BAF Graphics commented that to meet the emerging London Plan requirements, Wandsworth Council should allow mixed use development at Lydden Road specifically through a designation. The Battersea Society responded that there is demand for affordable space for start-up SMEs. They propose that the Council should use Article 4 Direction to remove permitted development right to protect offices from change of use in key areas.

**Council Response**

Where development triggers the affordable workspace threshold (by providing over 1000 sqm of economic floorspace, gross), and the applicant intends to fulfil this requirement through the provision of affordable workspace (rather than managed/open workspace, see Question 35), the Local Plan Policy LP 41 (Affordable, Flexible and Managed Workspace) takes a variable spatial approach to this provision. The extent to which workspace is deemed 'affordable' varies considerably based on the type of business which the workspace accommodates, but the focus should be on rents or charges which are accessible for early stage businesses. The Employment Land and Premises Study (ELPS) 2020 identified that there are particular types of affordable workspace which should be provided to satisfy the needs of a range of businesses in Wandsworth, which has informed this policy position. These are reflected in the place-specific requirements for modern office and small studio space close to the VNEB OA, and for light industrial space with good strategic road access.

In the VNEB OA and in the surrounding Queenstown Road area, including the Battersea Design and Technology Quarter (BDTQ, see Question 32), rents for both office and industrial space are high. Businesses likely to benefit from affordable workspace here are high growth potential start-ups and larger SMEs in the creative industries. These types of businesses require high quality office space and/or modern studio spaces, and the location of premises is particularly important for them as this can determine the right labour and client base. For affordable workspace to work the discount on rent will need to be substantial considering that market rents are high in what is now a recognised part of the central London office market, and the policy requires this discount to be 50%. This policy sets a proactive approach to encourage high value start-ups and SMEs from the creative industries to locate here, supporting economic and social inclusion goals, and takes account of the discounted rents that are required in adjacent areas within neighbouring boroughs, such as Lambeth. This is considered necessary to ensure that Wandsworth's economy stays competitive and continues to be diverse.

There is an opportunity to provide good quality affordable workspace with access to the strategic road network, primarily catering for light industrial activities, although which may also include some office provision. The analysis of rent levels across the borough indicates that the most appropriate location to provide this space is within industrial land in the Wandle Valley. Industrial and formerly industrial locations in the area have excellent links to the strategic road network via Garratt Lane

and the A218, and would be suitable for uses businesses yet to become financially proven and involved in the 'crafting' industry and/or physical design and production, but which do not require location adjacent to the CAZ. To deliver a supply for this type of workspace, 10% of the economic floorspace (gross) should be delivered at 25% of the prevailing market rent for comparable premises. Where the provision is for large-floorplate premises which might be occupied by a single tenant, for example as with some logistics and distribution uses, alternative provision, including through payment-in-lieu financial contributions may be appropriate.

Elsewhere in the borough, developments which meets the threshold are intended to provide affordable workspace should delivery 10% of gross economic floorspace capped at a rate of 20% less than the prevailing market rate for comparable premises.

The discounted rental values identified in this policy are targets. These will be achieved through S106 negotiations, and the Council recognises there will be site specific considerations, depending on the location, size and type or premises, and the viability of the scheme.

**Question 37 Is the approach to out-of-centre development, including seeking mixed uses on redevelopment sites such as the riverside and Focal Points of Activity, still appropriate in light of new national policy which supports a ‘town centre first approach’ and identifies a need to ensure resilience?**

Cllr Peter Carpenter of the Labour Party commented that a balanced approach is needed. The Battersea Society, and Catherine Carpenter of Lambeth Council commented that a town centre approach is key.

Mr Andrew Catto of the Putney responded that due to the accessibility of all of Wandsworth more area should be designated for small scale offices and other commercial uses such as Putney Town Centre.

**Council Response**

The ‘town centre first approach’, as set out within the National Planning Policy Framework (NPPF), has taken on greater significance in light of the ongoing and likely future impacts of the Covid-19 pandemic. In support of public health measures, many shops and services in the borough’s high streets and local parades have experienced prolonged periods of closure that have placed significant strains on businesses. This has exacerbated and accelerated trends that had already been witnessed within the industry as a result of structural change, and in particular the continued shift away from bricks and mortar retailing towards online shopping. This has already been manifested in broadly identifiable trends of increasing numbers of vacancies on the high street, as well as high profile closures and CVAs.

To support the long-term success and resilience of high streets, the Local Plan therefore embraces the ‘town centre first approach’, identifying these as the preferential locations for a broad range of town centre uses, which include: retail development; leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo hall); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). The principle of this is set out in Local Plan Policy LP 44 (Wandsworth’s Centres and Parades). In effect, this means that when an applicant wishes to bring forward a town centre use in a location outside of the borough’s town or local centres (or Important Local Parades, where of a suitable scale), they must demonstrate that there are no alternative sites for this particular development in these preferential locations before permission will be granted. This principle is established in Local Plan Policy LP 46 (Out of Centre Development).

In doing so, the Plan therefore seeks to concentrate potential investment in the borough’s centres, helping to revitalise these areas whilst optimising their high public transportation accessibility. It is important to note that this does not mean that such uses are unable to locate anywhere else, and this flexibility is retained within the Plan where the so-called ‘sequential test’ can be met. The sequential approach to development is advocated within the NPPF (paragraph 88), and is widely used and well-understood within the profession.

The Plan does take an exceptional approach towards certain town centres uses, based on specific evidence and strategic decisions, as follows:

- Town centre uses are encouraged within the Nine Elms area, where they are aligned with the Council’s strategic approach set out in the Vauxhall Nine Elms Battersea Opportunity Area Framework.



- It is recognised that the availability of land within centres is insufficient to meet the forecast levels of demand for office floorspace (NB. based on data collected before the impacts of the Covid-19 pandemic; the Council will continue to closely monitor the impacts of the pandemic on office provision and adjust the policy approach accordingly). To accommodate this demand, the Plan identifies a variety of locations outside of the centres (which are given corresponding policy designations) which are also suitable for smaller scale office uses. This will result in a greater distribution of these uses across the borough, and builds on existing agglomerations of businesses.
- The Plan encourages the location of visitor accommodation in the Focal Points of Activity and on edge of centre sites, as well as in the centres themselves. This is in order to help meet an identified demand.

In addition to this, it is also important to note that the Local Plan has also introduced greater flexibility in the types of uses that are permissible within the town and local centres. While preferential locations are still identified for different types of retail, but the Plan now supports a broader range of uses in these locations. This approach is considered consistent with the National Government's changes to the Use Class Order, and the introduction of a broader E Class. For more information

**Question 38 Are the sites defined as suitable for new office development in the adopted core strategy policy (PL8d) and LPEID (Policy E12) still relevant, and should they be reconsidered in light of a holistic review of the town centre first objective and resilience?**

The Labour Group responded that technological change is driving the need for this policy to be reviewed. Cllr Peter Carpenter of the Labour Party answered that there is no need for a review at this stage. The Battersea Society support the adopted Policy E12 and would like to see the town centre first approach and the sequential test rigorously applied.

Innova Investments would like to see Clapham Junction recognised and used for its office development potential better. It is a prime strategic location which is being underused. Putney High Street Development commented that the Putney Town Centre's office stock requires some redevelopment and the community benefit it should be better recognised.

**Council Response**

Local Plan Policy LP 36 (Promoting and Protecting Offices) sets out the approach for the location of new office development. It recognises that there are two distinct offices market operating within Wandsworth, and plans for these accordingly. The first is the emerging office market located within the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA), in London's Central Activities Zone (CAZ). This comprises of modern office space, much like that found in the Walkie Talkie or The Shard, and which caters for businesses operating at a regional, national or international scale. The other, and larger – comprising over 80% of the borough's total office floorspace – is a local / sub-regional market which primarily caters for small and medium-sized businesses serving customers within the borough and in areas across the south and west of London. In accordance with the NPPF, the policy establishes a 'town centre first' approach, directing new office development within the local / sub-regional market to the borough's five town centres, and, where there is limited capacity in these locations, to appropriate edge-of-centre sites. Both Clapham Junction and Putney are therefore identified as preferential locations for future office provision. As part of the Local Plan's greater emphasis on a place-based approach, Area Strategies have been developed for both of these centres, including the allocation of sites where the provision of office space is required. Local centres will also be appropriate for new office development, where this is of a scale compatible with the size and capacity of the local centre.

The forecasting exercise undertaken as part of the borough's ELPS 2020 suggests that there is a net additional requirement for 22,500 sqm of office floorspace up to 2034. The draft Economic Land Availability Assessment (ELAA) undertaken by the Council has identified a reasonable supply of land for offices in town centres, however both this assessment and the ELPS recognise that this capacity will nonetheless fall short of the projected demand for new office floorspace. For this reason, the Local Plan identifies a number of other areas where the provision of office floorspace, as part of mixed use redevelopment schemes, is appropriate.

These sites are based on an assessment of the borough's local office market to identify premises which can be intensified or redeveloped to accommodate demand. As well as meeting an identified need for office floorspace, redevelopment in these locations has the potential to realise the Council's other strategic ambitions: both economic, such as the intensified provision of industrial floorspace; and social, through the provision of new homes and accompanying uses to support vibrant and resilient communities. Further information on each designation is included within Local Plan Policy LP 38 (Mixed Use Development).

Outside of the locations identified above, in accordance with the NPPF, applications for the provision of new office floorspace will need to be justified by a sequential test to ensure that it does not have a detrimental impact on the prioritised areas.

**Question 39 How could a broader range of town centre uses with a longer economically active day be achieved alongside new homes?**

Cllr Peter Carpenter responded that this would be achieved with difficulty as the noise pollution comes once people leave night time economy venues. The Labour Group commented that there is demand for greater arts and performing venues however regulations should be tight and enforced. Putney High Street Development commented that new night time economy uses should be encouraged and while they will have to be managed they must also be allowed evolve and remain dynamic.

The Theatre's Trust answered that the Theatre Trust supports the diversification of the night time economy, but proper consultation is required with relevant stakeholders. Enable Leisure and Culture responded that there is a strong demand for pop up venues and the like. Street festivals and the Wandsworth Arts Festival have important economic benefits but also health and wellbeing benefits.

Ms Susan Jones asked for the museum to be brought back. The Battersea Society commented that the use of space above retail premises for office and housing should be encouraged.

**Council Response**

The Local Plan introduces a new policy on the evening and night-time economy, which recognises the value that such uses bring and intends to enhance or diversify this offering in sustainable locations (town centres and the CAZ). That notwithstanding, it recognises that it is still necessary to consider the effect of increased concentrations of evening uses. Applications for uses must therefore demonstrate that they do not harm the amenity of surrounding uses, including by those travelling to or from the use, and whether as a result of the individual business of the cumulative impact of the proposed use in relation to the number, capacity and location of other night-time economy uses in the area. To ensure this, such uses might be controlled through conditions attached to planning applications, as well as the requirements outlined within the Council's Waste Services and the Statement of Licensing Policy. New business premises should also be designed to incorporate waste storage and collection from within the premises, and further details are available in the Refuse and Recyclables in Development SPD.

The NPPF encourages boroughs to recognise the role that residential uses can play in contributing to the overall health and vitality of a centre, both by increasing footfall within that centre, as well as contributing to the borough's housing target. In accordance with this, Local Plan Policy LP 45 (Development in Centres) promotes the location of residential uses within the borough's designated centres (alongside a broader range of retail and leisure uses, see Question 41).

There are opportunities within the borough's town centres – and in particular in Wandsworth, Clapham Junction, and the emerging CAZ Retail Cluster at Battersea Power Station – to accommodate residential uses as part of large, transit-orientated development. This should optimise the high public transit accessibility of these locations whilst contributing to placemaking through the provision of active ground floor uses and well designed public spaces.

In all of the borough's centres, but particularly in Balham, Putney, and Tooting, there is scope for the small-scale intensification through introducing new residential units (and offices) on the upper floors of existing commercial and community uses. The Council also recognises that is a 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; 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.

**Q40 How can the Local Plan do more to support the borough's town centres in relation to accessibility and Information Technology needs, e.g. ensuring sufficient WiFi infrastructure and promoting the next generation of 5G infrastructure?**

Positively Putney responded that better fibre speed for internet is important for attracting companies. The Clapham Junction Town Centre Partnership answered that low fibre speed was mentioned by several businesses – businesses are keen that this is improved. The Battersea Society commented that the Council should provide more WIFI hotspots around the town centres but this must not create street clutter.

Cllr Peter Carpenter of the Labour Party suggested that Wandsworth could mandate the provision of such infrastructure in new developments, and in upgrades to existing buildings. The Theatre's Trust commented that Wandsworth should keep up the thresholds for retail in town centres.

**Council Response**

Local Plan Policy LP 23 (Utilities and Digital Connectivity Infrastructure) supports the provision of digital connectivity infrastructure in the borough. The provision of the infrastructure necessary to support development, including those identified in the Council's Infrastructure Delivery Plan, will be sought. The availability and capacity of existing and proposed infrastructure or the potential of its enhancement through investment will be taken into account when assessing planning applications.

The Council will support digital connectivity infrastructure that does not have a significant impact on the appearance of a building or detract from the character of an area. Utility apparatus must minimise its visual impact on the street scene, camouflaging its appearance wherever possible, and must not lead to an over accumulation of visual clutter, be located in such a way as to impact on the usability of the pedestrian environment including for those with disabilities and for families, and must not cause harm to the appearance of heritage assets. Digital connectivity infrastructure must maximise the opportunity for co-location / mast-sharing on existing taller buildings and sites. All digital connectivity infrastructure must not create any unacceptable risks to the health, wellbeing and amenity of residents and users of the host site or surrounding and nearby sites.

**Question 41 The adopted Local Plan requires a minimum proportion of retail premises within Core frontages (70%) and Secondary frontages (50%) to be retained. Should Wandsworth:**

- Maintain current policies;
- Relax the thresholds to allow wider range of uses; or
- Remove all thresholds and let the market decide the mix of uses?

Positively Putney responded that there has been a decline in retailing in Putney, which is reflective of the national picture but exacerbated locally by the loss of large office blocks to residential. Day time trade has been drawn away as a result and vacancy rates for retail has increased as a result. Putney requires more flexibility with regards to uses, and 70% is too high as a threshold. The Putney Society commented that the Putney Society agree with the comments from Positively Putney BID that 50% A1 is probably more sustainable than 70%. The Clapham Junction Town Centre Partnership answered the policy should be more flexible as areas such as Clapham Junction would like to see greater office uses but are unable to supply it. Putney High Street Development responded retail policies need to be more flexible and allow for a variety of different use classes.

Cllr Peter Carpenter of the Labour Party commented that the definitions of use classes restrict certain businesses operating on high streets.

The Labour Group commented that current policy works well. The market is a reality but it can also be steered and the Council's policy to define protected space has worked well. Philip Whyte of the Wandsworth Society answered that Wandsworth should maintain current policy because of the importance of maintaining local parades. Relaxation of standards would threaten parades like East Hill. The Battersea Society answered the current policies provide a useful means of preserving the vitality of town centre and that any changes should be subject to consultation. Ms Margaret Brett commented that the focus should be on retaining as much retail space as possible in core and secondary frontages.

### **Council Response**

Since the consultation was held on the Issues paper, there have been substantial changes in the national approach to town centres, and in particular to the way that different uses are classed within the planning system. From 1 September 2020, the Government has made significant changes to the Use Class Order, with the introduction of a new Use Class E, which combines commercial, business and service uses; Use Class F.1, for learning and non-residential institutions; and Use Class F.2, for local community uses. These changes are set out as follows:

<b>Use</b>	<b>Use Class up to 31 August 2020</b>	<b>Use Class from 1 September 2020</b>
Shop not more than 280 sqm mostly selling essential goods, including food and at least 1km from another similar shop	A1	F.2
Shop	A1	E
Financial and professional services (not medical)	A2	E
Café or restaurant	A3	E
Pub or drinking establishment	A4	Sui generis
Take away	A5	Sui generis

Office other than a use within Class A2	B1a	E
Research and development of products or processes	B1b	E
For any industrial processes (which can be carried out in any residential area without causing detriment to the amenity of the area)	B1c	E
Clinics, health centres, creches, day nurseries, day centre	D1	E
Schools, non-residential education and training centres, museums, public libraries, public halls, exhibition halls, places of worship, law courts	D1	F.1
Cinemas, concert halls, bingo halls and dance halls	D2	Sui generis
Gymnasiums, indoor recreations not involving motorised vehicles or firearms	D2	E
Hall or meeting place for the principal use of the local community	D2	F.2
Indoor or outdoor swimming baths, skating rinks, and outdoor sports or recreations not involving motorised vehicles or firearms	D2	F.2

Changes of use within the same use class are not considered to constitute development and therefore do not require planning permission. The Local Planning Authority's ability to exercise control over changes of use between certain uses has therefore been significantly reduced. In particular, this impacts the Council's long-standing policy position of a threshold requirement to ensure the protection of retail (formerly A1) floorspace within designated Core and Secondary Shopping Frontages, as well as Parades of Local Importance. As many retail uses fall within the new E Use Class, unless there are particular conditions preventing it (for example, under a previous planning permission), an existing shop could be changed to an alternative use within the same class without the need for permission.

In this context, the Council do not consider that a threshold-based policy (as currently adopted) continues to make sense in practice, as it would difficult to enforce through development management. The draft Local Plan therefore seeks to embrace the flexibility offered by the new Use Classes, which are intended, in particular, to provide greater agility to businesses in light of the potentially damaging long term impact of the Covid-19 pandemic on their viability. A revised policy approach is set out in Local Plan Policy LP 45 (Development in Centres). The Local Plan recognises the benefit of maintaining a concentrated retail core, and therefore retains the three frontage designations (Core, Secondary, Other), which are identified as the preferred location for shops within ground floor units, encouraging appropriate retail development to locate as follows:

- **Core Frontages:** These are located in the most central areas or the 'prime pitch' retail locations (such as main high streets or shopping centres), and are where retail uses, including large format and national multiples, already predominate.
- **Secondary Frontages:** These areas support the core frontages, and include retail provision as well as a diversity of other appropriate town centre uses. Retail within these locations will typically include smaller units, and often support independent businesses.
- **Other Frontages:** These areas are generally more peripherally located, and provide complementary uses to the shopping function of the core and secondary frontages. All

town centre uses are appropriate in these frontages, including retail. Their peripheral location can offer potential for more affordable rents, and will be attractive to small businesses that cannot compete with the larger chains or more desirable secondary frontage locations.

A threshold for the percentage of units which must be in retail use is no longer applied. Instead, proposals should seek to maintain and promote the continuity of (non-residential) active frontages and / or provide a direct service to a visiting member of the public. As with the current policy, other town centre uses will be permitted alongside retail in these locations. The Council will continue to monitor the balance of uses within these locations (which, based on the 2018 data, were generally performing well, with three of the five centres demonstrating a percentage of retail units in excess of the threshold in the core frontages). Where appropriate, the Council will use conditions to restrict changes of use away from retail as part of permissions (where required) should the monitoring indicate this to be appropriate.

In addition to designated frontages within the centres, the draft Local Plan will continue to designate Important Local Parades (ILPs), which have a key role in contributing to sustainable development, providing access to day-to-day necessities (including food, newsagents, pharmacies and post offices) within walking distance from home. As with the centre frontages, the introduction of the new Use Class Order has resulted in it no longer being considered appropriate or practical to require a percentage threshold of units to be retained in retail use, however the Council reserve the right to use conditions to retain specific uses (e.g. retail) in appropriate locations in order to protect the provision of local shops and services. This ambition is also addressed in draft Policy LP 47 Local Shops and Services.



**Question 42 Should the existing boundaries of the protected parades be changed? If so where and why?**

The Labour Group responded that they should probably not as a matter of principle, only in detailed cases. The Battersea Society answered that consideration should be given to extending protected parades to cover Falcon Road north of the railway bridge, Battersea Park Road west of the railway bridge, and Northcote Road to the south. Philip Whyte of the Wandsworth Society commented that existing boundaries should be extended to cover the all existing parades, bearing in mind that there are already set proportion of retail used proposed.

Ms Margaret Brett responded that ground level uses should be protected and the conversion of multiple small lots into residential is not appropriate as this could undermine viability.

The Clapham Junction Town Centre Partnership responded that adding too much residential to mixed use is not appropriate and creates a nuisance with the night time economy. Office development is preferred.

Cllr Peter Carpenter of the Labour Party answered that stronger promotion and enforcement of active frontages.

**Council Response**

The approach to the borough's town centre and retail policies in the draft Local Plan is informed by Wandsworth's Retail Needs Assessment (RNA) 2020, which has been undertaken by Lichfields, and comprises an assessment of the quantitative and qualitative needs for land and floorspace for retail and leisure development over 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 (up to 2035) of the Local Plan period, 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 report makes the recommendation that the strategy should prioritise the reoccupation of vacant units within designated Town and Local Centres and Important Local Parades, within the existing centre/parade boundaries. This has been taken forward in the draft Local Plan, and no changes have been proposed to the boundaries of the protected centres or parades as part of the full review. It is noted that locations such as Falcon Road north of the railway bridge, the area of Battersea Park Road west of the railway (and the designated local centre), and areas of Northcote Road to the south of the town centre would all be considered as 'edge of centre' in terms of the NPPF, and would therefore be sequentially preferable above other locations should there be no suitable sites within the identified centre. This is considered an appropriate approach given the limited demand for new retail / leisure floorspace identified in the RNA.

Within centres, ground floor uses in designated frontages must be retained as appropriate town centre uses, and have an active frontage or provide a direct service to visiting members of the public. Any conversion of use (including the rear of premises to residential) must retain a viable-sized unit. These principles are set out within Local Plan Policy LP 45 (Development in Centres).

Where new development, including residential, is brought forward near to existing uses which positively contribute to the evening and night-time economy, the Agent of Change principle will apply. This principle places the responsibility for mitigating the impact of noise and other nuisances firmly on new development. This means that where new developments are proposed close to existing noise-generating uses, it is the responsibility of the applicant to design that development in

an appropriately sensitive way in order to protect the amenity of the new occupiers, and which ensures that the existing uses, such as theatres, concert halls, pubs, live-music venues, and night-clubs, remain viable and can continue in their present form without the prospect of licensing restrictions or the threat of closure due to noise complains. This is set out within Local Plan Policy LP 48 (Evening and Night-Time Economy) – see also the Council’s comments on response to Question 45, below.

**Question 43 What else do you think the local plan should consider to enhance town centres, local centres and local parades?**

The Theatres Trust suggests the plan supports increased arts, community, cultural and social facilities within town centres, and is permissive of temporary/meanwhile changes of use that help activate vacant units. The Labour Group commented that the Council should do more to encourage arts & culture as in Bedford pub or Theatre 503.

Positively Putney commented that mixed use should not be predominantly residential in town centres as it erodes the purpose of town centres. Ms Susan Jones answered that the Council should broaden what's available to residents, beyond cafes, restaurants and bars. Putney High Street Development would encourage LB Wandsworth to be less focused on the amount of retail floorspace in town centres, rather focus on providing modern retail units that meet the needs of potential retail tenants. Port of London Authority responded that the Council should improve access to the River Thames and Path with links to public transport facilities including riverbus services. Cllr Peter Carpenter of Labour Party answered yes, but the local shopping parade struggles to maintain full occupancy.

The GLA responded the emerging London Plan policies SD6 to SD9 set out the Mayor's strategic approach to town centres. These policies encourage a town centre first approach. Wandsworth should focus commercial uses, including offices and visitor accommodation in the CAZ and town centres as well as encourage increased residential development. The Local Plan should include an approach which supports the long term vitality of its town centres, including through the diversification of the potential uses within the centres.

Tooting Bec & Broadway Neighbourhood Forum answered that measures to promote greening, liveability, wellbeing and acceptable levels of traffic should be considered. The Battersea Society responded that public sitting and resting facilities, and wider footpaths to reduce traffic noise and pollution.

**Council Response**

The Local Plan, responding to legislative changes on the Use Classes introduced by the government, has introduced a greater flexibility in the balance of uses that are acceptable in the borough's designated centres and parades. The current adopted approach of protecting certain threshold percentages of retail is no longer considered to be practical, and the new approach, aligned to the new Use Classes, will necessarily be more responsive to the market. Further information is included in the Council's commentary on Question 41, above. As part of the greater flexibility, the Council will continue to promote a full range of uses, including arts, cultural, community, social and leisure facilities. This is set out within Local Plan Policy LP 45 (Development in Centres).

In line with the NPPF (paragraph 85 part f), the draft Local Plan recognises that residential development can play an important role in ensuring the vitality of centres, and this is therefore encouraged in appropriate locations; however these do not ground floor units within the designated frontages, which are required to retain active uses and / or provide a service to the visiting public.

The Local Plan introduces a new policy LP 50 (Meanwhile Uses), which encourages the temporary use of vacant sites (including through phased development) to help create vitality and vibrancy. This promotes arts and cultural uses, community spaces / facilities, uses which support employment opportunities for local people (e.g. incubator hubs), dedicated affordable workspace, and food growing spaces.

In conjunction with topic-based policies, Wandsworth's draft new Local Plan places a greater emphasis on a place-based approach. Area strategies have been developed to guide the growth of different parts of the borough in a sensitive and tailored way, including for each of the five town centres and Roehampton. The Area Strategies contain a range of proposals under the themes of 'People First', 'Smart Growth', and 'Placemaking', and include the identification and allocation of sites for development, as well as greening, connectivity and urban realm / public space proposals.

**Question 44 Do you have local shopping facilities or local services within walking distance for home to meet day-to-day needs?**

The Battersea Society answered that there is a lack of medium sized retail options and the solution is to develop Clapham Junction and Falcon Lane properly. Ms Susan Jones responded yes.

**Council Response**

The Local Plan will take forward the NPPF's 'town centre first' approach with respect to medium sized retail development, which continues the current and established approach of the borough's town centres, and the emerging 'CAZ retail cluster' at Battersea Power Station, as the preferential location for such development. The Plan will also, however, protect smaller scale local shopping facilities and services which fall outside of the town and local centres or the borough's important local parades, and where these can be demonstrated to meet an otherwise unmet local need. This is to help realise the Council's ambition that everyone in the borough should have access to local shopping and services facilities within 400m of where they live.

### **Question 45 How can the Council best continue to support night-time economic activity in the borough?**

TFL answered that the Council should work with partners to support and manage a thriving and safe night time economy that is well served by safe and convenient sustainable night-time transport. Cllr Peter Carpenter of the Labour Party commented that greater opening hour flexibility to allow businesses to benefit from the night tube/ bus.

Putney Society responded that community uses on town centre sites should be encouraged, the existing cultural offering protected and more encouraged. It encourages local pride and brings custom to the high street. Positively Putney responded that Putney's night time economy is thriving. The GLA answered that the night time economy venues should be protected and cultural facilities should be clustered together

Cllr Peter Carpenter of the Labour Party commented that family homes should be kept out of town centres to avoid tension with night time economy. The Labour Group answered policing, street cleaning resolve street begging / conflict with living requirements.

Tooting Broadway & Bec Neighbourhood Forum answered that they would like the Council to work closely with the Forum on joint solutions within the context of a Neighbourhood Plan. Clapham Junction Town Centre Partnership commented that the Clapham Junction night time economy should be expanded with greater office accommodation provided.

The Theatres Trust commented that the Plan will need to adequately reflect considerations around the 'Agent of Change' principle to help maintain existing uses. More generally, town centre policy should be supportive of a wider mix of uses and within the plan there must be robust protection of existing facilities from loss. The latter may be better dealt with through bespoke policies or topics as is already the case.

### **Council Response**

The evening and night-time economy in Wandsworth makes an important contribution to the borough's social and economic prosperity, creating opportunities for businesses as well as providing opportunities for socialising, integration, and fun, and this is reflected in a new policy within the Local Plan Policy LP 48 (Evening and Night-Time Economy). The borough's pubs, bars, cinemas, theatres, comedy clubs, live music venues, nightclubs, and other cultural venues attract people to the town centres, increasing footfall, and extending the role of the centre into the evening. In addition, many of these buildings contribute positively to the built environment and to the area's sense of place. The policy therefore establishes support for proposals that enhance or diversify Wandsworth's night-time economy where certain conditions are met. Firstly, to promote the benefits of clustering, and to concentrate the impacts such uses generate, the policy requires that new evening and night-time economy uses should be located in the borough's centres, including the proposed CAZ retail clusters in Nine Elms, which are well served by late night public transportation. Secondly, recognising the potential impacts (such as noise) that night-time uses can create, the policy requires that applications demonstrate that they do not harm the amenity of surrounding uses, including by those travelling to or from the use, and whether as a result of the individual business or the cumulative impact of the proposed use.

Conversely, where new development is brought forward near to existing uses which positively contribute to the evening and night-time economy, the Agent of Change principle will apply. This principle places the responsibility for mitigating the impact of noise and other nuisances firmly on

new development. This means that where new developments are proposed close to existing noise-generating uses, it is the responsibility of the applicant to design that development in an appropriately sensitive way in order to protect the amenity of the new occupiers, and which ensures that the existing uses, such as theatres, concert halls, pubs, live-music venues, and night-clubs, remain viable and can continue in their present form without the prospect of licensing restrictions or the threat of closure due to noise complains.

The principles of supporting the night-time economy are embedded within the new Area Strategies being proposed in the Local Plan, including in Tooting. The Local Plan identifies that the Tooting Bec and Broadway Neighbourhood Forum are currently in the process of drafting their Neighbourhood Plan, and the initial outputs of this process (in particular the Tooting Bec & Broadway Neighbourhood Characterisation Study (Phase 1 Part 1) 2019) have been considered and incorporated into the Area Strategy. It is the intention that the Area Strategy and the proposed Neighbourhood Plan will inform and complement each other, and the Planning Policy team look forward to further engagement in the development of each.

**Q46 How might the Local Plan seek to manage an increase in the range of uses in the town centres, including residential uses, and the needs of the night time economy?**

The Battersea Society answered that the Council must work with the police and BIDs to reduce anti-social and criminal behaviour.

**Council Response**

Comments noted. The Council's Economic Development team perform most of the work liaising with Metropolitan Police Service and BIDs on this particular issue, although it is noted that Local Plan Policy LP 1 (Urban Design) requires that all development proposals have regard to how they might minimise opportunities for crime and ant-social behaviour, based on an understanding of the locality and the potential for crime and safety issues. Within town centres, where evening and night-time economy uses are promoted, these will only be supported where they do not result in a negative impact on the amenity on the surrounding residential and non-residential uses, as a result of the use itself or from those travelling to and from the use. Conditions may be used, including limits on hours of operation, in order to ensure this (see Local Plan Policy LP 48 (Evening and Night-Time Economy)).



**Q47 What Arts, Culture and Entertainment activities and facilities in the borough are important to you, and why?**

Chocolate Films LTD responded that the Wandsworth Arts map is very useful but the facilities are too dispersed across the borough. Ms Susan Jones commented that Tara Arts, BAC, cinema, Putney Arts Theatre are within easy reach and their productions are very relevant and interesting. She also uses her local pub.

Positively Putney commented that there is demand in Putney for more community based spaces and they encourage footfall in town centres. New developments should provide community spaces and vacant lots should be able to become community facilities on a temporary basis. The Council should encourage more meanwhile tenants. Tooting Bec & Broadway Neighbourhood Forum answered that arts, culture and entertainment were consistently identified as areas of deficiency in Tooting during our consultation. The library was highly valued. Clapham Junction Town Centre Partnership commented that a cinema is needed. Cllr Peter Carpenter of the Labour Party commented that there's a lack of music venues, in particular a decent concert hall.

The Royal Academy of Dance answered that arts/culture should be accessible to all. Interdisciplinary discussions about how art relates to everyday life. Sustainable events, inter-generational opportunities and support for artists in residence schemes. Enable Leisure and Culture stressed the importance of cultural facilities. The Theatres Trust commented that the range of theatres and art centres provide opportunities for socialisation, volunteering and employment.

**Council Response**

The Council is preparing an Arts and Culture Strategy. The Council will be working along with external stakeholders including residents, community groups, developers and arts organisations to develop this strategy. The Arts and Culture Team of the Council will also be leading on managing the Joint Cultural Needs Assessment (JCNA) working group of key internal stakeholders and few key external stakeholders (the Arts Council, BAC and the chair of the Wandsworth What Next Chapter) to assess the cultural needs of the borough. The new Arts and Culture Strategy 2020 - 2030 will provide a long-term vision for Culture and Arts in Wandsworth and the role the Council will play in supporting this vision: rooted in the creative offer but also how it links to our communities, places and resources. It also aligns with wider suite of Council strategies to help embed arts and culture into the wider work of the local authority. This strategy will recognise and expand the opportunities that exist for residents and visitors to engage with, experience and enjoy Arts and Culture.

Local Plan Policy LP 18 (Arts, Culture and Entertainment) uses introduces a new policy which includes and supports the proposals for meanwhile uses.

The Local Plan also introduces a new policy LP 50 (Meanwhile Uses). This supports proposals for the meanwhile – or temporary – use of sites where this helps to provide vibrancy and vitality, and mitigates the impact of construction / underutilised capacity during the phased development of a scheme. The policy identifies temporary uses that promote arts and culture as being suitable for such meanwhile uses.

**Question 48 What do you consider are the constraints and opportunities for arts, culture and entertainment uses in the borough?**

The Royal Academy of Dance answered that Wandsworth is dense and varied population who consume a lot of culture. There are opportunities to encourage greater participation through better connectivity and with more family events. RAD aims to open its facilities to the public. The constraints are mostly the lack of connectivity and schools should be actively encouraged and rewarded for encouraging arts. More funding to support research into needs assessment for culture in Wandsworth.

The Theatres Trust commented that the Council should protect Wandsworth's facilities with a robust policy for loss of a facility.

Enable Leisure and Culture answered that areas such as Putney, Roehampton and Latchmere have populations who feel less able to attend arts and culture events compared to the Wandsworth average. Enable are looking into the regeneration opportunities. Enable hope that the online S106 calculator will help address the culture deficiencies in these areas. Currently WAF is creating a network for everyone in the borough to experience cultural events and network.

Cllr Peter Carpenter of the Labour Party commented that there are lots of little venues in the borough, but a lack of major theatre or music venues. Tooting Bec & Broadway Neighbourhood Forum answered that Tooting has a shortage of flexible community spaces. For suitable sites the Council should find appropriate partners to bring forward community based proposals.

**Council Response**

The Council is preparing an Arts and Culture Strategy. The Council will be working along with external stakeholders including residents, community groups, developers and arts organisations to develop this strategy. The Arts and Culture Team of the Council will also be leading on managing the Joint Cultural Needs Assessment (JCNA) working group of key internal stakeholders and few key external stakeholders (the Arts Council, BAC and the chair of the Wandsworth What Next Chapter) to assess the cultural needs of the borough. The new Arts and Culture Strategy 2020 - 2030 will provide a long-term vision for Culture and Arts in Wandsworth and the role the Council will play in supporting this vision: rooted in the creative offer but also how it links to our communities, places and resources. It also aligns with wider suite of Council strategies to help embed arts and culture into the wider work of the local authority. This strategy will recognise and expand the opportunities that exist for residents and visitors to engage with, experience and enjoy Arts and Culture.

The Local Plan recognises the vital role played by arts and culture as part of the place shaping strategy, ensuing places support living, working, supplying, caring, learning and enjoying and focussing on three core principles: People First, Placemaking and Smart Growth. A key area of focus is the concept of the 15 minutes neighbourhood, and how we ensure that culture provision features as part of the local offer.

**Question 49 Do you have any comments on arts, culture and entertainment in the borough?**

The Royal Academy of Dance answered that the borough lacks a clear vision for arts culture and entertainment and support is needed to protect venues for culture. If real improvements are to be made and marginalised people helped then a plan will be needed.

The Battersea Society answered that the Battersea area would benefit from a cultural plan that protects existing venues and promotes more establishments such as a cinema.

**Council Response**

The Council is preparing an Arts and Culture Strategy. The Council will be working along with external stakeholders including residents, community groups, developers and arts organisations to develop this strategy. The Arts and Culture Team of the Council will also be leading on managing the Joint Cultural Needs Assessment (JCNA) working group of key internal stakeholders and few key external stakeholders (the Arts Council, BAC and the chair of the Wandsworth What Next Chapter) to assess the cultural needs of the borough. The new Arts and Culture Strategy 2020 - 2030 will provide a long-term vision for Culture and Arts in Wandsworth and the role the Council will play in supporting this vision: rooted in the creative offer but also how it links to our communities, places and resources. It also aligns with wider suite of Council strategies to help embed arts and culture into the wider work of the local authority. This strategy will recognise and expand the opportunities that exist for residents and visitors to engage with, experience and enjoy Arts and Culture.

**Question 50 Do you have any comments on the protection of pubs in the borough?**

The Labour Group and The Theatres Trust expressed concern about the loss of historic pubs and of those that fulfil a social need. The current protection is probably adequate but need to keep under review. Ms Susan Jones and Ms Margaret Brett commented that she agrees with the Council's current policy on protecting pubs.

The Wandsworth Society and the Battersea Society answered that they strongly support the use of the Article 4 Direction to secure the retention of pubs as also specified by Battersea Society.

**Council Response**

The Council will continue its strong stance for the protection of pubs. The Government has now amended the Use Classes Order (UCO) and removed pubs from the General Permitted Development Order which helps prevent their loss where local policy exists to protect pubs. Wandsworth took a leading role in protecting its pubs and continues to do so which now reflect the Government's ambition to protect pubs underlining their importance to the community and this borough.

Local Plan Policy LP 16 (Public Houses and Bars) establishes that the loss of public houses and bars will be resisted. Public Houses and bars of historic or architectural interest and/or community value will be protected from demolition and/or change of use.

**Question 51 What do you think are the main issues, constraints and opportunities for visitor accommodation in the borough?**

Cllr Peter Carpenter of the Labour Party responded that there's a shortage of recognised chain hotels in the borough and that they should be encouraged. The Labour Group commented that AirBNB style accommodation is a threat in areas such as Tooting

The Battersea Society and Clapham Junction Town Centre Partnership commented that Battersea would benefit from additional visitor accommodation. Positively Putney answered that they support greater visitor accommodation in Putney. Cllr Peter Carpenter of the Labour Party responded that Wandsworth would benefit from additional visitor accommodation. Tooting Bec & Broadway Neighbourhood Forum answered that Tooting would benefit from more visitor accommodation however it must respect the character of the area.

**Council Response**

Local Plan Policy LP 35 (Visitor Accommodation) supports the provision of visitor accommodation, subject to compliance with criteria set out in the policy. Planning policy is not in a position to in a position to address the shortage of recognised chain hotels. The policy also supports the provision of visitor accommodation where they are appropriately located within the Central Activity Zone (CAZ), within or on the edge of town centres, in Focal Points of Activity, or other locations with good levels of public transport accessibility (PTAL 4 or higher).

The use of residential premises in London as temporary sleeping accommodation involves a material change of use requiring planning permission by virtue of the Greater London Council (General Powers) Act 1973 (as amended), unless it benefits from the new exception introduced by the Deregulation Act 2015 which came into force on 26 May 2015. This provides that the use of temporary sleeping accommodation of any residential premises in London does not constitute a change of use (for which planning permission would be required) if certain conditions are met, including the use of the premises as temporary sleeping accommodation for no more than 90 nights. If the conditions are not met, use as temporary sleeping accommodation of residential premises involves a material change of use requiring planning permission. Local Plan Policy LP 27 (Protecting the Existing Housing Stock) protects existing housing from change of use to non-permanent accommodation (including timeshare, short-term lets, and temporary sleeping accommodation, as well as C1 uses which include hotels, guest houses and boarding houses, and hostels and bed and breakfast premises). Demand for short-term and temporary sleeping accommodation of these types in the borough should be met from appropriate sites in non-residential use, rather than sites used for permanent housing.

**Question 52 Should there be a Wandsworth specific policy on hotels and visitor accommodation, is so what should it contain?**

All England Lawn Tennis Club commented that there is a shortage of hotel accommodation when the Championships and they support the development of high-quality hotels. Ms Margaret Brett responded that this area of Southfields is a useful resource of temporary accommodation for the Wimbledon Tennis. This increases the footfall to the local centre.

Labour Group responded that yes, a major 21st century growth industry and we have no policy to cover amount, targets, numbers, impact on locality, etc.

Cllr Peter Carpenter of the Labour Party responded that the regulation of AirBNB style operators needs to be controlled. The Putney Society answered that the 90-day limit needs to be better enforced as it takes long term housing off the market. Battersea Society answered that short terms letting can lead to loss of permeant housing and disturbance to homeowners. Tooting Bec & Broadway Neighbourhood Forum answered that Tooting would benefit from more visitor accommodation however it must respect the character of the area.

**Council Response**

Comments noted. Local Plan Policy LP 35 (Visitor Accommodation) supports the provision of visitor accommodation, subject to compliance with criteria set out in the policy.

The use of residential premises in London as temporary sleeping accommodation involves a material change of use requiring planning permission by virtue of the Greater London Council (General Powers) Act 1973 (as amended), unless it benefits from the new exception introduced by the Deregulation Act 2015 which came into force on 26 May 2015. This provides that the use of temporary sleeping accommodation of any residential premises in London does not constitute a change of use (for which planning permission would be required) if certain conditions are met, including the use of the premises as temporary sleeping accommodation for no more than 90 nights. If the conditions are not met, use as temporary sleeping accommodation of residential premises involves a material change of use requiring planning permission. Local Plan Policy LP 27 (Protecting the Existing Housing Stock) protects existing housing from change of use to non-permanent accommodation (including timeshare, short-term lets, and temporary sleeping accommodation, as well as C1 uses which include hotels, guest houses and boarding houses, and hostels and bed and breakfast premises). Demand for short-term and temporary sleeping accommodation of these types in the borough should be met from appropriate sites in non-residential use, rather than sites used for permanent housing.

**Question 53 Do you have any comments on short term letting In the borough?**

The Battersea Society responded Short terms letting can lead to loss of permanent housing and disturbance to homeowners. The Putney Society answered that the 90 day limit needs to be better enforced as it takes long term housing off the market.

Ms Margaret Brett commented that Southfields is a useful resource of temporary accommodation for the Wimbledon Tennis. This increases the footfall to the local centre.

**Council Response**

The use of residential premises in London as temporary sleeping accommodation involves a material change of use requiring planning permission by virtue of the Greater London Council (General Powers) Act 1973 (as amended), unless it benefits from the new exception introduced by the Deregulation Act 2015 which came into force on 26 May 2015. This provides that the use of temporary sleeping accommodation of any residential premises in London does not constitute a change of use (for which planning permission would be required) if certain conditions are met, including the use of the premises as temporary sleeping accommodation for no more than 90 nights. If the conditions are not met, use as temporary sleeping accommodation of residential premises involves a material change of use requiring planning permission. Local Plan Policy LP 27 (Protecting the Existing Housing Stock) protects existing housing from change of use to non-permanent accommodation (including timeshare, short-term lets, and temporary sleeping accommodation, as well as C1 uses which include hotels, guest houses and boarding houses, and hostels and bed and breakfast premises). Demand for short-term and temporary sleeping accommodation of these types in the borough should be met from appropriate sites in non-residential use, rather than sites used for permanent housing.

#### 4.5. Transport

The consultation document allows for **general comments** on the issue of transport.

The Battersea Society asked that their Local Implementation Plan comments should be read in conjunction with this issues document comments.

#### **Council Response**

All LIP consultation comments were considered in the drafting of the Final LIP which has been important for the drafting of Local Plan Policies.



### **Comments on Supporting Text**

TFL commented that Section 1.5.3 states that “the draft London Plan will shape how transport is managed at new developments”. She requested the Council include the London Plan car and cycle parking standards in the Local Plan.

Paul Reardon commented on paragraph 1.5.10 that "the Council already appears to recognise that the total absence of rail connections in and around Roehampton is a concern that needs to be addressed, given the socio-economic mix of the population and the relatively poor bus service options (in part due to weight restrictions on Hammersmith bridge). He also mentioned on paragraph 1.5.11 that the areas of Roehampton and Putney Vale are poorly served by public transport; there being no rail services at all for what is a densely population area, and the bus services connecting to rail in other parts of the borough are at best mediocre. What is needed is an extension to the Hammersmith-City line under the Thames with stations in Barnes, Roehampton and terminating in Kingston (possibly via Ham, another area devoid of rail service).

### **Council Response**

Local Plan Policy LP 53 (Parking, Servicing, and Car Free Development) sets out that cycle and off street parking will meet the minimum requirements as set out in the emerging London Plan and any subsequent amendments.

PM 7 Roehampton Regeneration Area Place Based Policy explains that the Council’s Local Implementation Plan indicates that a large number of trips could be switched to walking and cycling in Roehampton. To facilitate this modal shift, opportunities to create a new connection for pedestrians and cyclists between Tunworth Crescent and Richmond Park, as well as other local cycle lanes, will be supported. Measures to improve public transport facilities by relocating existing bus stops in lay-bys along Danebury Avenue into carriageway, and creating additional bus stops will be supported.

**Question 54 is the current balance of space between cars, cyclists and other road users about right? If not, what should the Plan do differently? Should there be different solutions for different times of the day or week?**

Paul Reardon commented that in the south west of the borough, where public transport is lacking, greater support should be given to private car infrastructure. The Covent Garden Market Authority responded that the use of roads varies during the day and night and any solution should recognise these differences.

Enable Leisure and Culture commented that there are numerous advantages to walking and cycling. Chocolate Films LTD answered more cycle paths, along with Dr Bike and Cycle Hubs. The Labour Group commented that they believe the target must be less space for cars and more space for pedestrians, cyclists, play. The Battersea Society suggested using wider pavements set out in new developments.

Positively Putney responded that Putney High Street should be pedestrianised to prevent it being a thoroughfare. Clapham Junction Action Group commented that several junctions are still too dangerous for cyclists.

Cllr Peter Carpenter of the Labour Party mentioned that vehicles are unduly prioritised by current policies. A shift of emphasis towards public transport, cyclists and pedestrians should be made. Goods vehicles should be restricted at peak times of day as they cause disproportionate congestion.

**Council Response**

PM 7 Roehampton Regeneration Area Place Based Policy explains that the Council's Local Implementation Plan indicates that a large number of trips could be switched to walking and cycling in Roehampton. To facilitate this modal shift, opportunities to create a new connection for pedestrians and cyclists between Tunworth Crescent and Richmond Park, as well as other local cycle lanes, will be supported and greater support for private car infrastructure can be avoided. LP 53 Parking, Servicing and Car Free Development does allow for off-street servicing for uses like the Covent Garden Market. The policies supporting text explains that the provision of off-street servicing is encouraged, in order to reduce impacts on the safe operation of the road network. Where appropriate, a Delivery and Servicing Plan and Construction Logistics Plan should be submitted in line with guidance in the London Freight Plan to ensure unique requirements are captured and considered.

Local Plan Policy LP 51 (Sustainable Transport) requires new developments to meet the Healthy Street Objectives which will help meet the desires of the commenters.

PM 5 Putney Place Based Policy outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists, within and across Putney Spatial Area and adjacent neighbourhoods, focusing in particular on improved north-south access to develop stronger links with and along the riverside. These measures have potential to reduce pollution, to improve accessibility to the Wandsworth's Riverside, and to create a pleasant entrance threshold to Putney High Street from the bridge.

### **Question 55 Do you support a shift away from car use to people using public transport, walking or cycling?**

TFL commented that Wandsworth will need 73 per cent mode of residents' journeys to be on foot, cycle and public transport mode in 2021 and 82 per cent in 2041. The Labour Group believes that the target of 80% of travel by public transport or sustainable by 2040 is too modest given global warming

Cllr Graeme Henderson and Cllr Jo Rigby responded that inclusive design is important to reducing barriers and to include cycle sheds in estate design. Earlsfield Ward straddles either side of Garratt Lane. Much of Garratt Lane is a concrete jungle completely bereft of any greenery or traffic calming measures. Safe crossing points across this busy road are few and far between.

Paul Reardon commented that there should be a different approach depending on the part of the borough and that Putney and Roehampton require specific attention. Covent Garden Market Authority commented for those in the night time economy, such as a wholesale market, using public transport to get to work is not viable and should be rectified. Catherine Carpenter of Lambeth Council responded that Wandsworth should begin co-ordinating with other boroughs to encourage greater connectivity. Port of London Authority commented that the riverbus facilities should be better promoted and accesses and facilities should be improved.

Cllr Peter Carpenter of the Labour Party, Ms Susan Jones, Tooting & Bec Forum, and the Battersea Society all support this shift. Chocolate Films LTD would welcome more bus stops, cycle lanes and more favourable phasing of traffic lights that are informed by use. TFL Commercial Development answered yes and new developments can play a key role in this shift away from cars by locating near public transport connections.

The Clapham Junction Town Centre Partnership suggested increased cycle parking at the ASDA car park at Clapham Junction. Innova Investments answered yes and there is an opportunity to improve Clapham Junction as a strategic interchange for London. The Wandsworth Society responded that they support the shift away but significant improvements are needed to Clapham Junction.

### **Council Response**

Local Plan Policy LP 51 (Sustainable Transport) supports proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access for all to services, facilities and employment. Proposals will be permitted where the proportion of trips made by walking, cycling and public transport is increased, and local connections by these modes are improved and car dominance is reduced, and active use of streets and public spaces is increased.

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) sets out that the Local Plan will meet the London Plan cycle parking standards. Local Plan Policy LP 1 (Urban Design) explains that proposals have to meet the standards for inclusive design as set out in the London Plan Policy D5. Local Plan Policy LP 59 (Urban Greening Factor) will require new developments to provide a greater amount of green features which will help a better, more inclusive environment for pedestrians and cyclists.

The Area Spatial Strategies for Putney and Roehampton both provide details as to how they will undergo a modal shift away from the private car. PM 7 Roehampton Regeneration Area Place Based Policy explains that the Council's Local Implementation Plan indicates that a large number of trips could be switched to walking and cycling in Roehampton. To facilitate this modal shift, opportunities

to create a new connection for pedestrians and cyclists between Tunworth Crescent and Richmond Park, as well as other local cycle lanes, will be supported and greater support for private car infrastructure can be avoided. Measures to improve public transport facilities by relocating existing bus stops in lay-bys along Danebury Avenue into carriageway, and creating additional bus stops will be supported. PM 5 Putney Place Based Policy outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists, within and across Putney Spatial Area and adjacent neighbourhoods, focusing in particular on improved north-south access to develop stronger links with and along the riverside. These measures have potential to reduce pollution, to improve accessibility to the Wandsworth's Riverside, and to create a pleasant entrance threshold to Putney High Street from the bridge.

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) does allow for off-street servicing for uses like the Covent Garden Market. The policies supporting text explains that the provision of off-street servicing is encouraged, in order to reduce impacts on the safe operation of the road network. Where appropriate, a Delivery and Servicing Plan and Construction Logistics Plan should be submitted in line with guidance in the London Freight Plan to ensure unique requirements are captured and considered.

Wandsworth's Duty to Cooperate Meetings have helped encourage greater connectivity with adjacent boroughs.

Local Plan Policy LP 60 (River Corridors) supports new and enhanced infrastructure, including piers for riverbuses and the provision of enhanced services, will be supported.

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) requires developments in an area with a PTAL of 5 or 6 be car free. Development of the ASDA Lidl and Boots site at Clapham Junction will be required to provide additional cycle parking in line with London Plan cycle parking standards.

PM 4 Clapham Junction Place Based Policies explains that the Council will work with Network Rail and Transport for London (TfL) to prepare a vision for Clapham Junction Station in improving its role as a major rail and public transport interchange in order to realise the development potential at the station, to better integrate it with the town centre and to York Road/Winstanley. This will seek to upgrade the quality of its appearance, functionality and facilities. This will unlock the barriers to access to the north of the station.

**Question 56 Do you support the Council's aspirations for Crossrail 2 including stations at Clapham Junction and Tooting Broadway?**

Mrs Laura Fletcher-Gray responded that Crossrail 2 is supported but it is hoped that any impact to Wandsworth Common will be discreet. TFL commented that issues such as access, capacity and connectivity and their cumulative effect should be considered from the outset.

Cllr Belton explained that Crossrail 2 should be called to a halt. Cllr Crichard would like a strategic review of the areas affected. Cllr White supported Crossrail 2 but advised that respect for heritage is needed and that large changes to infrastructure can create significant changes to the population and character of an area.

The Battersea Society responded yes, however, Clapham Junction station is unable to cater safely for existing passenger volume and significant improvements are needed in the short and longer term. TFL Commercial Development commented large transport developments can lead other residential and mixed use developments.

Innova Investments responded yes and there is an opportunity to improve Clapham Junction as a strategic interchange for London. The Wandsworth Society supported the Council's aspiration for stations at Clapham Junction and Tooting Broadway.

Mr Mike Potter of the Toot & Bec Forum responded that Tooting Bec & Broadway Neighbourhood Forum supports neither at present. We would like the Council to continue to consult with the Forum in the period ahead. Paul Reardon commented that it is important that Crossrail 2 serves St George's Hosp.

**Council Response**

Local Plan Policy LP 54 (Public Transport and Infrastructure) sets out that the Council supports public infrastructure projects such as Crossrail 2 but the Local Plan also recognises that due to uncertainties with its development the project may not come forward in the lifetime of this Local Plan. Both the Tooting and Balham Spatial Area Strategies recognise the impact Crossrail 2 could have for their town centres. Until there is more certainty around the project and the proposed route the Council will hold off detailed preparation.

Local Plan Policy LP 55 (Protection and Enhancement of Green and Blue Infrastructure) prevents open spaces like Wandsworth Common from damage. Local Plan Policy LP 3 (The Historic Environment) sets out requirements for new developments in terms of respecting historic assets.

PM 4 Clapham Junction Place Based Policy explains that the Council will work with Network Rail and Transport for London (TfL) to prepare a vision for Clapham Junction Station in improving its role as a major rail and public transport interchange in order to realise the development potential at the station.

**Question 57 What other improvements to public transport do you think the Council should be considering?**

Labour Group commented that flexibility, comfort, timeliness, cleanliness are all important in encouraging a movement from private cars. Any changes should be aimed at those objectives. TFL responded that greater use of public transport helps move the paradigm shift away from cars and with fewer vehicles on the road, buses will be more reliable.

London Underground LTD responded that they have no comments to make at this stage except that London Underground Infrastructure Protection needs to be consulted as Statutory Consultees on any planning application within London Underground zone of interest. Also, where there are intended works in the highway we would need to be notified of these so that we can ensure there is no damage to them.

The Battersea Society responded that a greatly improved environment at Clapham Junction Station with improved bus/train interchange. Including reinstatement of Battersea High Street Station, creation of another bus route from Vauxhall west of Queenstown Road along Battersea Park Road, improved access to platforms at Battersea Park station. Clapham Junction Town Centre Partnership responded that although the Brighton Yard entrance helped, the St Johns Road entrance to the station is still very congested, especially at peak hours. Cllr Peter Carpenter of Labour Party has asked to extend the Northern Line to Clapham Junction and extend the tram to Barnes Station via Roehampton.

The Putney Society commented that buses to Roehampton (the only part of the borough with no rail service) are already seriously overcrowded as a result of recent residential developments and increased student numbers at Roehampton University. A step change is needed before further development is contemplated. Positively Putney commented that Putney Train Station is at capacity and the main entrance is very congested at peak times. The idea to implement a second entrance is very much supported.

Mrs Laura Fletcher-Gray commented that Earlsfield would benefit from railway improvements. Paul Reardon responded that he supports the extension of the Hammersmith & City line under the Thames with stations in Barnes, Roehampton and terminating in Kingston (possibly via Ham, another area devoid of rail service connections). Tooting Bec & Broadway Neighbourhood Forum commented that an alternative to the bus turning circle at Tooting Broadway is needed. The Wandsworth Society responded that bus services in Trinity road should be improved, with a connection to Fulham.

**Council Response**

Local Plan Policy LP 51 (Sustainable Transport) supports proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access for all to services, facilities and employment. Proposals will be permitted where the proportion of trips made by walking, cycling and public transport is increased, and local connections by these modes are improved and car dominance is reduced, and active use of streets and public spaces is increased.

PM 3 Nine Elms Place Based Policy explains that the Council will work with Network Rail to bring forward plans for improved access to Battersea Park Station which better integrates and connects with the surrounding area. This policy will ensure that Battersea Park Station is able to cater for a future extension of the London Overground to provide an all-day service to Battersea Park Station and will provide better connectivity between Queenstown Road Station and Battersea Park Station

though the Battersea Exchange development with a new entrance to Queenstown Road station. Site Allocations in the Kirtling Street Cluster will be expected to enhance bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors

PM 4 Clapham Junction Place Based Policy explains that the Council will work with Network Rail and Transport for London (TfL) to prepare a vision for Clapham Junction Station in improving its role as a major rail and public transport interchange in order to realise the development potential at the station.

PM 7 Roehampton Regeneration Area Place Based Policy explains that the Council's Local Implementation Plan indicates that a large number of trips could be switched to walking and cycling in Roehampton. To facilitate this modal shift and reduce overcrowding on buses in Roehampton, measures to improve public transport facilities by relocating existing bus stops in lay-bys along Danebury Avenue into carriageway, and creating additional bus stops will be supported.

PM 5 Putney Place Based Policy Proposals to create a secondary entrance to Putney Rail Station and improve pedestrian and taxi accessibility will be supported.

There are currently no plans for the outstanding suggested changes.

### **Question 58 How can the Local Plan better support more trips being made by walking and cycling?**

Labour Group commented that limited private parking in new developments, better cycle lanes, etc will improve quantity of walking and cycling. TFL answered create dense, mixed land-use developments in areas with good public transport. Greater cycle infrastructure should also be provided. Chocolate Films LTD answered cycle parking, but of various sizes as the generic cycle pole does not actually fit every bike and can therefore make some bikes quite vulnerable to theft. This can often put people off cycling as they consider how long they will need to leave their bike for.

Positively Putney commented that there is a need to improve cycle parking. To encourage the elderly to walk into town centres we need to provide adequate seating places for them to rest. These can be incorporated into the street scene with planting opportunities and really improve the aesthetics of an area. New developments should be made to include seating provision. Clapham Junction Town Centre Partnership answered better cycle infrastructure

Cllr Peter Carpenter of Labour Party answered by blocking off rat runs and introducing a 'Little Holland' type scheme to divert vehicles away from residential streets.

Battersea Society responded by providing clearly differentiated spaces for each with routine enforcement of breaches to these. Moving ahead with the Jubilee Bridge from Lombard Road to the north of the Thames. By understanding that walking and cycling is a complement to good public transport. Some citizens are less able to walk or cycle. TFL Commercial Development responded that development should be focused towards locations which are currently or can be made more sustainable (such as town centres); the need for users of developments situated in such locations to use private modes of transport to access key local services is significantly reduced due to their proximity.

Cllr Graeme Henderson and Cllr Jo Rigby answered the use of CIL to provide active travel infrastructure. Enable Leisure and Culture commented that priority for all new street (re)designs should be focused on active travel, sustainable travel, and then private vehicles. More cycle hire docks and dockless cycle hire should be promoted

### **Council Response**

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) requires developments in an area with a PTAL of 5 or 6 be car free. It also sets out that cycle and off street parking will meet the minimum requirements as set out in the emerging London Plan and any subsequent amendments. Additionally, no extra parking permits will be issued to any occupiers of additional housing units created in major residential or mixed-use developments anywhere in the borough or through conversions in existing or future Controlled Parking Zones (CPZ).

Developments in Wandsworth will be expected to meet the requirements of London Plan Policy SD6 Town centres and high streets which includes the delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.

Site Allocation WT13 B&Q Smugglers Way aims to redevelop that area as the Wandsworth Society suggests.



Local Plan Policy LP 51 (Sustainable Transport) supports proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access for all to services, facilities and employment. Proposals will be permitted where the proportion of trips made by walking, cycling and public transport is increased, and local connections by these modes are improved and car dominance is reduced, and active use of streets and public spaces is increased.

The Lombard Road/ York Road Riverside Focal Point SPD outlines the need for significant investment in Local Cycle routes and enhancing the riverside walk. Local Plan Policy LP 54 (Public Transport and Infrastructure) sets out a 6m minimum width for the Thames Riverside walk.

As part of the Local Plan Review, the CIL will also be updated in line with CIL regulations. The expenditure of CIL will be listed in a separate document that is published apart from the Local Plan which is why it is not covered in these questions.

**Question 59 Do you support the introduction of changing regulations for kerbside use? If so, do you support providing more space for delivery and servicing vehicles?**

Nicola Grant of the Positively Putney commented that a greater number of communal delivery depots in central locations should be better promoted.

The Battersea Society responded that these are not supported and there should be a six-day ban on parking on main roads. All new developments should be required to provide off road space.

Clapham Junction Action Group responded yes if it means more regulation and enforcement.

**Council Response**

Comments noted. The Draft Local Plan promotes 'urban logistics hubs' in appropriate locations as part of the Area Strategies for Wandsworth, Nine Elms, Clapham Junction and the York Road / Winstanley Regeneration Area, and Putney. These are microhubs for logistics facilities which are used for last mile deliveries by electric vans or cargo bikes which serve a limited spatial range. They should be located in sustainable locations in areas that are connected to the wider road and rail networks, railway stations and, where other policies are adhered to (e.g. on active frontages), town centres.

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) sets out that adequate off-street servicing arrangements are made for commercial vehicles and general servicing.

**Question 60 Do you support more deliveries taking place outside peak hours, including at night, assuming precautions are taken to minimise noise?**

Cllr Peter Carpenter of Labour Party responded this is essential if congestion is to be reduced. Night time deliveries need to be restricted in residential areas between 11pm and 6am.

The Battersea Society commented that they support deliveries taking place throughout the day and early evening but not overnight. Delivery plans for retailers should be subject to consultation and assessment depending on the size of vehicle proposed and the residential nature of the surrounding area. Clapham Junction Action Group responded no, until existing nuisance can be prevented.

Ms Margaret Brett responded that delivery at night to the local supermarkets would be a good idea. Replingham Road is frequently congested during the morning rush hour because a delivery vehicle parks on the yellow line for a long time and traffic cannot pass. Wandsworth Society commented that it depends on the location of these deliveries, which must bring collection at an easy reach.

Ms Susan Jones commented yes along with Covent Garden Market Authority who also commented generally, yes, but some daytime deliveries cannot be avoided. For example, New Covent Garden Market traders serve central London businesses, who require the delivery of food and catering supplies during the daytime.

**Council Response**

Local Plan Policy LP 14 (Air Quality, Pollution and Managing Impacts of Development) sets out noise and vibration requirements for new developments that will consider the impact on surrounding and existing uses. In the supporting text for Local Plan Policy LP 37 (Managing Land for Industry and Distribution) explains that any proposals for new delivery or distribution facilities must pay particular regard to the relevant Local Plan and London Plan policies regarding transport, traffic, public realm and amenity in order to ensure any increase in vehicle movements or changes to operation does not have a significantly negative impact on the local area.

The supporting text for Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) explains that where appropriate, a Delivery and Servicing Plan and Construction Logistics Plan should be submitted in line with guidance in the London Freight Plan to ensure unique requirements are captured and considered.

**Question 61 Would you support greater use of delivery Collection points (where you can have parcels delivered and pick them up at your leisure), in order to reduce the number of private Deliveries made to home businesses?**

The Battersea Society and Cllr Peter Carpenter of the Labour Party commented yes, but there is already a fairly extensive network of them.

The Wandsworth Society and Clapham Junction Action Group commented that this is definitely a way forward, reducing traffic caused by delivery vans/HGV, and neighbourhood disturbance. It should be highly encouraged (we have noticed that we already had a sharp increase of Amazon locker/delivery points in the Clapham Junction area, which is welcome).

Ms Margaret Brett commented that there is scope for delivery collection points in the local centre. The Clapham Junction Town Centre Partnership responded that the board supports deliveries taking place outside peak hours, and would also like to see the promotion of delivery hubs.

Michael Atkins of the Port of London responded that Wandsworth should recognise the importance of freight services that incorporate access to the river.

Labour Group commented that they have no particular views but are sceptical about “delivery collection points” as any loss of service is not likely to encourage people away from private cars.

**Council Response**

The trend towards localised ‘collection points’ is considered positive, however from a planning perspective, this typically would operate as an ancillary use to the primary function (for instance, where these are located within a local shopping facility, a library, etc). As such, the Local Plan does not set out land use principles which specifically address these. They are generally supported where they can demonstrate that other public benefits, in line with the Council’s policies, have been met and do not negatively impact the primary use. A good example might be Local Plan Policy LP 51 (Sustainable Transport), which supports development proposals which make freight movement safer, less polluting and more efficient. Where permission is sought for such uses, these will be assessed on a case by case basis.

On a similar basis, the Draft Local Plan promotes ‘urban logistics hubs’ in appropriate locations as part of the Area Strategies for Wandsworth, Nine Elms, Clapham Junction and the York Road / Winstanley Regeneration Area, and Putney. These are microhubs for logistics facilities which are used for last mile deliveries by electric vans or cargo bikes which serve a limited spatial range. They should be located in sustainable locations in areas that are connected to the wider road and rail networks, railway stations and, where other policies are adhered to (e.g. on active frontages), town centres.

**Question 62 How should new developments best incorporate the need for delivery and servicing vehicles?**

The Labour Group commented that they should look for design/architectural features that minimise delivery and service requirements. TFL commented that kerbside loading should be taken into consideration and should be in line with TfL's Kerbside Loading Guidance, January 2017. Deliveries outside of peak hours should be supported along with night time deliveries where possible. Collection points should also be supported to reduce trips from failed delivery attempts.

Mrs Laura Fletcher-Gray responded that Local Plan policies should be flexible to ensure servicing requirements are not onerous and reduce the development capacity of the site. Cllr Peter Carpenter of the Labour Party responded that off-road provision needs to be made to avoid creating congestion or violating parking restrictions.

The Wandsworth and Battersea Society commented that they should provide adequate space on site.

**Council Response**

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) sets out that adequate off-street servicing arrangements are made for commercial vehicles and general servicing. In order for Wandsworth to promote sustainable transport the amount of parking and servicing should be as efficient and lean as possible otherwise valuable land that could be used for better uses will be lost. On-street parking is to be avoided.

**Question 63 Do you support the introduction of changing regulations for kerbside use? If so, do you support a reduction in parking space for private vehicles?**

Cllr Peter Carpenter of the Labour Party responded that yes, private vehicles will reduce over time. Battersea Society answered that they support a reduction in parking spaces for all vehicles on main roads.

Sinead Loftus of Chocolate Films LTD, The Wandsworth Society and Ms Margaret Brett responded that there is no support for the loss of local kerbside space for private vehicles. There is support for a limitation on residential parking permits per household so that a balance can be achieved.

**Council Response**

London Plan Policy D8 Public Realm explains in its supporting text that the specific balance between the different functions of any one space, such as its place-based activities, its function to facilitate movement and its ability to accommodate different uses of the kerbside, should be at the heart of how the space is designed and managed.

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) requires that new developments must comply with the emerging London Plan's guidance regarding on-street car parking and any subsequent amendments. The council will encourage applications for development that require less on-street parking in areas well-connected to public transport. The policy also stipulates that no additional parking permits will be issued to any occupiers of additional housing units created in major residential or mixed-use developments anywhere in the borough or through conversions in existing or future Controlled Parking Zones (CPZ). Where possible, the Council will use informatives and legal agreements to ensure that future occupants are aware they are not entitled to apply for on-street parking permits.

**Question 64 Do you support more developments being car-free or 'car-lite' (i.e. with very low provision of car parking)?**

Ms Susan Jones and Ms Margaret Brett answered yes for all new developments. TFL commented that they strongly support car-free development and locating growth in places that are well connected by public transport and car-lite developments elsewhere, in line with the draft London plan parking standards. NHS Property Services responded that NHSPS would support developments being car-free and car-lite where possible. TFL Commercial Development responded that TfL CD strongly support the principles of car-free and/or 'car-lite' development. TR Property Investment Trust, Innova Investments, Workspace Group answered yes, within highly accessible locations close to tube/ railway stations.

Cllr Peter Carpenter of the Labour Party answered that provision needs to be made for disabled parking and servicing and delivery and car clubs

The Wandsworth Society, The Battersea Society, Clapham Junction Action Group commented that no, this is too often used by developers to avoid expensive developments and thus maximise profit to the expense of the existing area. Less car-parking always means more congested adjoining streets especially at night time and weekend when visitors come or rented cars need to park.

**Council Response**

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) sets out that Car-free development will be required where:

1. The PTAL is 5 or 6
2. Public transport interchanges are close by
3. A transport assessment can demonstrate that through a combination of walking, cycling, public transport, car club parking, travel plans and other relevant measures that further private car parking is not required. The transport assessment shall demonstrate how reductions in the need to travel can be achieved.
4. The appropriate minimum number of disability friendly parking spaces are provided in accordance with the emerging London Plan and any subsequent amendments.

Low Car development will be required where:

1. The PTAL is 3 or 4
2. Public transport stops are close by
3. A transport assessment can demonstrate that through a combination of walking, cycling, public transport, car club parking, travel plans and other relevant measures minimal car parking is all that is required. The transport assessment shall demonstrate how reductions in the need to travel can be achieved.
4. The appropriate minimum number of disability friendly parking spaces are provided in accordance with the emerging London Plan and any subsequent amendments.

It also specifies that Car Club Parking and memberships are provided in all residential developments that require travel plans in accordance with Local Plan Policy LP 52 (Transport and Development) (B) and that Minimum numbers of disability-friendly parking spaces are provided in accordance with the emerging London Plan and any subsequent amendments.

**Question 65 Do you support the introduction of changing regulations for kerbside use? If so, do you support providing more space for taxi and/or private hire vehicles?**

Cllr Peter Carpenter of Labour Party commented yes, loading bays should also be used for Taxi / Private Hire drop off. Wandsworth Society supports more de-regulated space for taxis. TFL responded that TFL prioritises kerbside space for walking, cycling and public transport. In some locations taxi and coach provision is appropriate, however these modes should not be more convenient than active travel and public transport use.

Battersea Society commented no, that operators of taxis and private hire vehicles should be required to put in parking plans within their licence application. Anecdotally there are too many 'lurking' Uber vehicles leading to pollution and congestion. Ms Margaret Brett answered no, there is a space for taxis outside Southfields Station that is rarely used. Uber private hire vehicles are essentially private cars belonging to other residents and this would give them an unfair advantage in seeking parking space.

**Council Response**

Local Plan Policy LP 54 (Public Transport and Infrastructure) states that developers will need to show that their proposal does not lead to an unacceptable amount of on-street parking. This will include showing acceptable motorcycle and scooter parking provision in town centre locations which does not detract from the character of the area. For residential conversions, the council will encourage replacement of existing general on-street parking with other kerbside uses to encourage more sustainable transport.

The council will support the redevelopment of existing car parks for alternative uses where it can be shown that the provision of car parks is being met now and into the future.

Minicab (private hire) offices will not be allowed however redevelopment of existing offices will be allowed provided they:

1. Do not adversely impact traffic congestion, local parking problems, residential amenity, safety, or footways; and
2. "At any time" stopping restrictions are already in place



**Question 66 What other policies should we consider relating to taxis and private hire vehicles?**

Labour Group commented that within the overall objectives of keeping down the need for private cars, these individual policies probably need to be considered in site specific terms

Battersea Society responded that a needs assessment should be undertaken which could well lead to a reduction in the overall number of licences issued.

Cllr Peter Carpenter of the Labour Party commented that we should ensure that all taxis and private hire vehicles meet low emission standards.

**Council Response**

These comments are noted.

**Question 67 Do you support the introduction of more charging infrastructure to enable people to switch to electric vehicles? If so, do you think this should be delivered on street, in new developments, or a mixture of both?**

The Clapham Junction Town Centre Partnership commented that existing ones seem to be under used at the moment. Positively Putney responded that the town centre is well serviced with charging points but they support residential lampposts being converted into electric car charging points to encourage more people to utilise electric cars.

TFL responded that TFL support the delivery of electric vehicle charge points where it does not incentivise people to drive into congested areas, especially central London, or park on street for long periods. Delivery should also be in accordance with emerging London Plan policy.

Labour Group commented yes in site specific circumstances. Cllr Peter Carpenter of the Labour Party responded that yes, fast charging facilities should be provided in new developments. On street provision should not be at the expense of footways which are often already cluttered.

The Battersea Society answered that they support more charging infrastructure but not on the footway or the public highway. They should be provided in laybys, in new developments or within petrol station and other forecourts. The Wandsworth Society commented yes, and a mixture of both on street and new developments. The borough must ensure enough points are available as demand increases. New developments should have an obligation to provide fast charging points. Ms Margaret Brett commented that wider access to charging points is a good idea provided it does not permanently reduce residential parking space.

Covent Garden Market Authority responded that electric vehicles are an emerging concept and it is anticipated there will be considerable refinement in the future, both in the nature of the vehicles (e.g. their range) and how they are charged. Care has to be taken that planning policies do not seek to promote concepts that are quickly superseded.

**Council Response**

Local Plan Policy LP 53 (Parking, Servicing and Car Free Development) explains that Electric Vehicle Charging capacity is provided in accordance with the emerging London Plan and any subsequent amendments. Policy T6 Car Parking of the London Plan requires that all operational parking should make provision for charging facilities including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities. Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.

Emerging London Plan Policy T6.1 Residential Car Parking requires that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

**Question 68 How should new transport technologies such as these considered?**

Cllr Peter Carpenter of the Labour Party commented that it is probably premature to give detailed consideration of these emerging technologies in this iteration of the Local Plan. Battersea Society responded that too little information to make any sensible comment. Covent Garden Market Authority answered that policies to address new technologies should be left till a future review of the plan.

**Council Response**

These comments are noted.

**Question 69 Are there any other transport issues the local plan should consider?**

Cllr Peter Carpenter of the Labour Party commented that overflight by aircraft arriving at and leaving Heathrow is a major noise and pollution issue. Wandsworth should seek to minimise the number of flight paths overflying the borough.

The Wandsworth Society and The Battersea Society responded that PTAL is not fit for purpose and neither the Council nor TfL seem willing to make an assessment of the combined added volume of people who will be attempting to use the current transport infrastructures.

Michael Atkins of the Port of London answered that with regard to new development the use of the River Thames for the transportation of construction materials and waste particularly for large scale projects must be promoted in the Local Plan.

Labour Group commented that within the overall objectives, of keeping down the need for private cars, these individual policies probably need to be considered in site specific terms.

Innova Investments responded that the redevelopment and regeneration proposals for Clapham Junction Station should be firmly embedded as a core part of the overarching spatial strategy for Wandsworth.

**Council Response**

Local Plan Policy LP 14 (Air Quality, Pollution and Managing Impacts of Development) does consider in its supporting text the impact of flight paths on Wandsworth is recognised and should be managed accordingly.

Local Plan Policy LP 49 (River Corridors) identifies that the River Thames and River Wandle are key features of the borough and fulfil important amenity, biodiversity, transport (people and cargo), leisure and recreation roles amongst other benefits. The River Thames performs important functions in relation to transport and the trans-shipment of freight.

PM 4 Clapham Junction Place Based Policy explains that the Council will work with Network Rail and Transport for London (TfL) to prepare a vision for Clapham Junction Station in improving its role as a major rail and public transport interchange in order to realise the development potential at the station.

#### 4.6. Open Space

The consultation document allows for **general comments** on the issue of open space and the environment. Positively Putney asked for CIL to be spent in the location where the development originated from and the Greater London Authority (GLA) asked for Wandsworth Borough Council (WBC) to produce an Urban Greening Factor in the new Local Plan.

#### **Council Response**

As part of the Local Plan Review, the CIL will also be updated in line with CIL regulations. The expenditure of CIL will be listed in a separate document that is published apart from the Local Plan which is why it is not covered in these questions.

Local Plan Policy LP 59 (Urban Greening Factor) will help add greening features to new developments in Wandsworth in line with the emerging London Plan guidance.

### **Comments on Supporting Text**

The All England Lawn Tennis Club requested that they be involved in the preparation of the Playing Pitch Strategy and Open Space Study. The Clapham Junction Action Group and other residents commented that the open space within Wandsworth is an asset and should be protected more and that the privatisation of public land should be strongly prohibited.

A resident noted that Central Wandsworth is an area of overheating, particularly along with Buckhold Road and the South Circular. Thames Water identified that flooding is likely to occur from sewers and sewerage treatment plants due to their nature requiring them to be close to rivers. Certain water and sewerage infrastructure developments will be required to be built in flood risk areas and flood risk sustainability objectives should accordingly make reference to sewer flooding.

**Council Response** The All England Lawn Tennis Club and the Battersea Society will be given the opportunity to provide comments on the Playing Pitch Strategy and the Open Space Study consultation process. Local Plan Policy LP 55 (Protection and Enhancement of Green and Blue Infrastructure) will ensure that open space is protected and emphasises its important role as an asset to the community. The Open Space Study will establish where the areas of deprivation are and will recommend means to improving existing open spaces. The Council understands the importance of public open space and one of the Local Plan's Environmental Objective is to; 'Protect and enhance open spaces and the natural environment, to support people's health and wellbeing and the borough's habitat and biodiversity objectives.

Local Plan Policy LP 59 (Urban Greening Factor) and Local Plan Policy LP 51 (Sustainable Transport) will help to reduce carbon emissions in the borough and stop overheating. The latter policy will support improvements to cycling and walking infrastructure and will help reduce the amount of car journeys on those roads mentioned and reduce the overall amount of carbon being released into the atmosphere leading to the increasing heat.

Local Plan LP12 (Water and Flooding) helps reduce the risk of surface water and sewer flooding, by requiring all development proposals in the borough that could lead to changes to, and have impacts on, surface water run-off are required to follow the emerging London Plan drainage hierarchy.

**Question 70 Are there any additional areas of open space which should be identified which are not currently?**

Positively Putney, Battersea Society, and the CJAP responses did not identify new areas of open space but rather proposed reuses or innovative uses of existing space which have additional urban greening or could perform the functions of open space such as Thai Square, Lacy Road and Northcote Road. Enable Leisure and Culture suggested making use of space on top of buildings especially schools and the Wandle Trail to be refurbished for biodiversity habitats.

**Council Response**

The Area Spatial Strategies and the Urban Design Study propose new public open space be created with new development at Lacy Road and public realm enhancements along with a public promontory being created at Thai Square. Local Plan Policy LP 59 (Urban Greening Factor) will help add greening features to new developments in Wandsworth and on top of buildings if viable. The Area Spatial Strategy for the Overarching Wandle Valley proposes several improvements which along with Local Plan Policy LP 57 (Biodiversity) should protect and enhance the quality and quantity of biodiversity along the Wandle Trail.

**Question 71 Are there any open spaces that you are aware of that could be improved, what measures could the Local Plan take to secure improvements?**

The Environment Agency (EA), Cllr Graeme Henderson and Cllr Jo Rigby, the Battersea Society suggested that several open spaces could be improved including: the restoration of the banks and in-channel habitats of the River Wandle within King George's and other public parks; the Thameside Parks could interact more effectively with River Thames.; open spaces could be created through the temporary closure of public streets; Thames Path at Battersea Bridge and the Friends of Christchurch Gardens.

Cllr Peter Carpenter suggested using CIL to maintain open spaces. Sports England and Enable Leisure and Culture mentioned that innovative management strategies such as local community sports users should be encouraged, and Voronoi modelling could be used to develop a clear understanding of open space needs and appropriate improvements. Sport England suggested that the Local Plan should be focusing on sports that help resident's health and well being and in particular rectify the shortage of artificial pitches in the borough.

**Council Response**

The Area Spatial Strategies include the Riverside Overarching Area and the Wandle Valley Overarching Area will help to ensure that the Thameside parks are better connected with the built and natural environment. Additionally, the Urban Design Study and Open Space Study will provide supporting guidance on how protect and enhance the open spaces in these areas and also help create a sense of place. Local Plan Policy LP 54 (Public Transport and Infrastructure) and Local Plan Policy LP 60 (River Corridors) all help protect and enhance the riverside and associate environment in Wandsworth.

Local Plan Policy LP 51 (Sustainable Transport) will encourage the use of parklets and other infill interventions to provide small urban open spaces. Local Plan Policy LP 20 (New Open Space) sets out higher open space requirements for developments than the previous local plan and Local Plan Policy LP 55 (Protection and Enhancement of Green and Blue Infrastructure) and Local Plan Policy LP 56 (Open Space, Sport and Recreation) protect and enhance all open space and green infrastructure in the borough.

CIL regulations restrict the Council to apply CIL funds for new infrastructure not exiting infrastructure. The Open Space Study will provide a funding guide that will acquire new maintenances cost.

The Playing Pitch Strategy will establish the deficiency of artificial pitches in the borough and provide recommendations to rectify all deficiencies. Local Plan Policy LP 56 (Open Space, Sport and Recreation) protects sport facilities and playing pitches from inappropriate development.

The Open Space Study included a survey which asked respondents what they value about open space. The study also identified the quality and use of different open spaces and provided recommendations for its management and maintenance. The Open Space Study will also help inform the Infrastructure Delivery Plan and can help with the financial support for open space investment. The Open Space Study will provide the information necessary for the Council and Enable to prepare Maintenance and Management Plans for more parks and open spaces in the borough.



**Question 72 Are there any parts of designated open space that do not properly serve open space functions and could be improved or even re-designated for other uses?**

In general, no respondents identified specific designated open spaces which are not serving open space functions properly. However, the Battersea Society are concerned with the growing amount of privatisation of public land and Cllr Peter Carpenter would like to see backland sites converted into pocket parks.

**Council Response**

The Council will identify any parts of open spaces that do not properly serve open space functions through the Open Space Study which will assess the quality and value of all open spaces and identify any issues with open space deficiency and provide policy and management recommendations. The Open Space Study will provide recommendations for open spaces that could be better served as other uses (e.g. allotments).

Local Plan Policy LP 20 (New Open Space) sets out higher open space requirements for developments than the previous local plan. Local Plan Policy LP 56 (Open Space, Sport, and Recreation) supports the development of open spaces in areas that are deficient. The policy also supports public access to open spaces in areas which are deficient in open space.

Backland sites were considered during the Site Allocation Sifting Process. All responses to the Call for Sites from 2016 and 2018 were considered.

**Question 73 There is a long waiting list for allotments. Should the Council seek to enable alternative food growing spaces? Please explain your answer, and detail suitable locations for new facilities.**

Respondents all commented positively to the Council seeking alternative growing spaces. Cllr Peter Carpenter suggested areas which could be redeveloped include redundant drying areas, and Ms Susan Jones suggested brick planters for community gardening within new developments. Chocolate Films Ltd identified the physical and mental health benefits that food growing spaces provide and recommended the Council should be open to innovative solutions. Additionally, Ms Margaret Brett commenter mentioned that pocket parks should not be converted into allotments as they provide separate benefits. Battersea Society would like to see the Council facilitating local organisations to develop these schemes.

**Council Response**

Local Plan Policy LP 21 (Allotments and Food Growing Spaces) supports the temporary use of vacant or derelict land or buildings for food growing spaces and the use of incidental open space on housing estates and other open space areas as well. Food Growing Spaces will be required in major new developments, particularly where there is a known demand for food growing space in the vicinity of the application site unless it is clearly demonstrated that such provision is not feasible or appropriate.

The Open Space Study will assess each area of open space in the borough including allotments and determine where any deficiencies exist.

**Question 74 In relation to new development, how can the management and maintenance of new parks and open spaces be best managed so as to ensure that no ongoing financial burden is placed on the local Council or the local community?**

Suggestions for management and maintenance of parks and open spaces which were submitted by Cllr Peter Carpenter include a service charge for residents with private open spaces and to have council tax pay for open spaces. The Battersea Society suggested a maintenance charge paid by those living within the development, a one-off endowment from the developers who were obliged to create the space, donations from visitors (crowd funding, online text donations, etc.), hiring out the space for private bookings, with firm controls as to use, timing, repair, etc, hiring out the space for public events – as above, involving volunteers in its management and maintenance. Enable Leisure and Culture, the Wandsworth Society and Ms Susan Jones suggested using Council Tax and CIL, whereas another asked for privatisation of public land to be stopped and for community uses of the park to be cheaper.

**Council Response**

Comments noted. S106 Agreements will be the primary source of management and maintenance funding. The Council will consider the cost of any open space proposal in the long term and set S106 rates accordingly.

**Question 75 Do you support the proposed approach to controlling flood risk?**

Several suggestions were submitted which offered additional means of controlling flood risk such as tackling the causes of climate change by Cllr Peter Carpenter, greater gully clearance was mentioned by the Battersea Society, and support for the existing district heating system was from the GLA. The EA would appreciate discussing with Wandsworth how to integrate their Thames 2100 Plan into the new Local Plan to control flood risk.

**Council Response**

Local Plan Policies LP 10 (Responding to Climate Change) and LP 11 (Energy Infrastructure) help tackle climate change and support the existing district heating system.

The Council has been liaising and meeting with the EA to ensure recommendations where appropriate are considered within LP 12 Water and Flooding policy. The Council have commissioned a Level 2 SFRA which includes updated climate change modelling. The Level 2 SFRA and Sequential Test findings have been shared with the EA for comment.

**Question 76 How can the Local Plan have regard to the cumulative impact of flooding should this take the form of stricter controls on minor extensions due to the potential cumulative impacts on for example fluvial flood storage or on surface water.**

Responses were not in favour of restricting minor extensions, but Cllr Peter Carpenter suggested the alternative of mandating ports ground coverings and Clapham Junction Action Group suggested the development at York Road will be affected by flooding from the River Thames.

**Council Response**

Comments noted. The Council has commissioned a Level 2 SFRA and subsequent Sequential test to consider new allocations within the plan and how they are affected by flooding. This commission included the updated climate change modelling.

**Question 77 Should there be stricter requirements on the management of surface water, because of the potential cumulative impact of multiple small-scale developments located in a small area within an urban catchment.**

Cllr Peter Carpenter and Enable Leisure and Culture both agreed that SUDs should be mandated for all developments.

**Council Response**

Local Plan Policy LP 12 (Water and Flooding) sets out that the Council will require the use of Sustainable Drainage Systems (SuDS) in all development proposals. LP 12 (Water and Flooding) policy also requires that planning obligation contributions are sought towards flood protection measures and SuDS in accordance with the Planning Obligation SPD.

**Question 78 Should the update of the SFRA take account of new modelling and mapping requirement as well as national policy, is there anything else that needs to be considered?**

Cllr Peter Carpenter and Enable Leisure and Culture both agreed with this question. The Clapham Junction Action Group suggested a specific publication should show the consequences on all the developments along the Thames' bank.

**Council Response**

Local Plan Policy LP 12 (Water and Flooding) has taken account of updated information on climate change modelling and be reflected in the SFRA level 2 and Sequential test report. This will be utilised when taking forward site allocations.

**Question 79 Should the Council review our current policy position to focus on control of emissions of particles and NOx during demolition and construction and carry out a risk assessment to identify potential impacts and corresponding mitigation measures?**

It was agreed by Cllr Peter Carpenter, the Labour Group, the Battersea Society, the Wandsworth Society, Ms Susan Jones and Ms Margaret Brett that the Council should review its current position on this matter. Lynn McNulty noted that a recent academic study at London University could be used to inform this policy and that Wandsworth residents have received significant exposure from road transport.

**Council Response**

Local Plan Policy LP 11 (Energy Infrastructure) requires applicants to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough. Local Plan Policy LP 13 (Waste Management) expects developers to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste.



**Question 80 Should the Council require all major developments to be ‘air quality neutral’ and resist development proposals which would materially increase exceedances levels of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures or and financial contributions to implement proposals in the Council’s Local Air Quality Management Plan?**

It was agreed by Cllr Peter Carpenter, the Tooting Bec Forum, the Battersea Society, Labour Group, and The Putney Society that all major developments should be made to meet the outlined requirements. Mr Carpenter and the Battersea Society both clarified that financial contributions should not be used as an alternative.

**Council Response**

Local Plan Policy LP 14 (Air Quality, Pollution and Managing the Impacts of Development) explains that the Council promotes ‘air quality positive’ design and the use of new technologies. Development proposals must be at least ‘Air Quality Neutral’, and should not contribute to a decrease in air quality during the construction or operation stage, in line with London Plan Policy SI 1. As well, only where it can be shown that on-site provision is not feasible, can off-site measures be considered as long as they meet the same air quality benefits.

**Question 81 What other policies on environmental protection should the Council consider?**

Cllr Graeme Henderson, Cllr Jo Rigby, and the Wandsworth Society suggested policies relating to air quality could be strengthened. The Labour Group suggested noise pollution should be included in policies on environmental protection. Cllr Peter Carpenter suggested the Council consider making new developments vehicle free.

**Council Response**

Local Plan Policy LP 14 (Air Quality, Pollution and Managing Impacts of Development) has strengthened the policies on air quality and the Council now promotes 'air quality positive' design and the use of new technologies to achieve this. Noise pollution has also been included in this policy.

Local Plan Policy LP 53 (Public Transport and Infrastructure) requires new development in areas with a PTAL of 5 or 6 to be car free.

**Question 82 How can the Local Plan ensure that Wandsworth makes real progress in addressing carbon emissions?**

In order to stay as informed as possible the Labour Group have suggested the Council stay as informed as possible. Cllr Graeme Henderson, Cllr Jo Rigby, and Cllr Peter Carpenter suggested new development should be carbon neutral. TFL Commercial Development suggested strategically locating developments at carbon reducing locations.

**Council Response**

Local Plan Policy LP 10 (Responding to the Climate Crisis) explains that developers are required to incorporate measures to improve energy conservation and efficiency, as well as contributions to renewable and low carbon energy generation. Proposals will be required to meet the following minimum reductions in carbon dioxide emissions, where targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations:

1. All new major development should achieve zero carbon standards, as set out in the emerging London Plan, with a minimum on-site reduction of 35%.
2. All other new residential buildings should achieve a minimum on-site reduction of 35%.
3. Residential development should achieve a 10% reduction and non-residential development should achieved a 15% reduction through energy efficiency measures alone.
4. In exceptional circumstances, where it is clearly demonstrated that the on-site percentage threshold targets listed in Parts D.1 and D.2 cannot be fully achieved, any shortfall must be provided through a cash in lieu contribution to the borough's Carbon Offset Fund.

Local Plan Policy LP 53 (Public Transport and Infrastructure) requires new development in areas with a PTAL of 5 or 6 to be car free. By focusing more and larger developments at public transport interchanges and restricting the amount of private car ownership the effects of climate change can be mitigated.

**Question 83 What other measures could the Local Plan implement to minimise greenhouse gas and carbon emissions?**

Cllr Peter Carpenter has suggested the use of non-fossil fuel technologies for heating new developments. The Battersea Society recommended policies relating to air quality could be strengthened and the Wandsworth Society suggested reducing individual car journeys to waste transfer stations.

**Council Response**

Local Plan Policy LP 11 (Energy Infrastructure) will require new development to connect to any existing decentralised energy network (DEN). Where networks do not exist, developments should make provision to connect to any future network that may be developed, having regard to the possibility for this to come forward.

Local Plan Policy LP 14 (Air Quality, Pollution, and Managing Impacts of Development) promotes 'air quality positive' design and the use of new technologies. Development proposals must be at least 'Air Quality Neutral', and should not contribute to a decrease in air quality during the construction or operation stage, in line with London Plan the emerging London Plan Policy SI 1. The tenth Environmental Objective of the Local Plan is to reduce the need to travel by ensuring centres provide a full range of facilities and amenities and support employment, this would extend to waste transfer stations as well.

**Question 84 Are there any sites or locations that should be considered as a site allocation as part of the Local Plan review for waste management?**

Cllr Peter Carpenter has suggested that no new allocations are necessary. Michael Atkins, Port of London, recommended that waste management sites should be safeguarded whereas Catherine Carpenter of Lambeth Council suggested directing new waste management facilities to industrial locations.

**Council Response**

Local Plan Policy LP 13 (Waste Management) sets out in Table 4 which waste sites will be protected. Part D of the same policy requires that new waste capacity is directed towards existing facilities, safeguarded wharves, and SIL and LSIAs. Applications for waste facilities outside of these areas will need to demonstrate that it is not feasible to develop the proposed facility in one of the preferred locations. Sites which support sustainable transport options such as rail and water are supported.

**Question 85 Should the Council continue to protect its existing safeguarded waste management sites and if not/so why?**

Cllr Peter Carpenter, Catherine Carpenter, the GLA, Enable Leisure and Culture and Ms Susan Jones all answered that waste management sites should be safeguarded. The Labour Group responded that greater efficiencies should be used to manage greater waste inputs.

**Council Response**

Local Plan Policy LP 13 (Waste Management) directs new waste facilities towards existing facilities, safeguarded wharves, and SIL and LSIA's. Applications for waste facilities outside of these areas will need to demonstrate that it is not feasible to develop the proposed facility in one of the preferred locations. Sites which support sustainable transport options such as rail and water are supported.

Local Plan Policy LP 43 (Protected Wharves) ensure that the existing wharves are protected.

**Question 86 The Local Plan addresses a wide variety of issues that directly and indirectly impact on the health of the population. Are there any areas in which it is currently deficient or could be strengthened to ensure future development better serves the health needs of Wandsworth's residents and visitors?**

Cllr Peter Carpenter, Cllr Graeme Henderson and Cllr Jo Rigby all identified ways in which planning can affect healthy lifestyles such as by restricting the provision of fast food outlets, promoting cycling and walking, developing child friendly areas which encourage activity. The South West London & St George Mental Hospital - NHS Trust have offered their support to WBC in producing their new policies.

#### **Council Response**

Local Plan Policy LP 15 (Health and Wellbeing) sets out a variety of ways the Council will impact the health of the population including restricting provision of fast food outlets; providing access to sustainable modes of travel including safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency; and requiring an inclusive development layout and public realm that considers the needs of all.

Local Plan Policy LP 51 (Sustainable Travel) sets out the Council's ambition to support proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access for all to services, facilities and employment. The Open Space Study, Playing Pitch Strategy and Urban Design Study will all contribute to growing the Council's understanding of areas which are in need of greater resources including outdoor gyms.

#### 4.7. Community

The consultation document allows for **general comments** on the issue of community.

Metropolitan Police Services commented that there is no mention of crime in the Issues Document and the Local Plan should rectify this. The growth in housing and offices will require a complimentary growth in policing. The Metropolitan Police Services would appreciate having discussions about the Local Plan going forward and collecting CIL for police infrastructure.

Thames Water requested that the Council are compliant with all national and regional policy and guidance relating to flooding. The Council should also consider the cumulative effect developments can have on flooding and to provide the appropriate infrastructure to mitigate flooding where possible. Thames Water recommends engaging with developers at an early point in the process. Thames Water have included draft policy text that they would recommend be used.

All England Lawn Tennis Club commented that the draft Local Plan should recognise the economic contribution The Championship makes to Wandsworth. Access is often from Southfields underground station and is very important for spectators accessing the venue.

#### **Council Response**

The Local Plan highlights the impact positive planning can have on crime throughout the plan and in particular within Local Plan Policy LP 1 (Urban Design) which seeks to minimise opportunities for crime and antisocial behaviour. The Planning Obligation SPD understands that the impact of large-scale development on the Metropolitan Police Services has funding implications, and it is widely accepted that policing infrastructure can be included within CIL and s106 obligations. The Metropolitan Police Services is currently preparing a calculation formula to enable collection of financial contributions and this will be used when available by the Council.

The Council has reviewed and applied the draft wording which is compliant with national and regional policy and guidance within Local Plan Policy LP 12 (Water and Flooding).

The Playing Pitch Strategy contacted the All England Lawn Tennis Club as part of the study and their comments have been considered within the context of writing the Local Plan.



**Question 87 Should the Council clarify the definition of community facilities and expectations around their retention, re-provision (where necessary and appropriate) and inclusion in new development?**

Chocolate Films LTD commented that the borough should be more inclusive of individuals living close by in neighbouring boroughs who wish to make use of community facilities in Wandsworth and vice versa.

The Metropolitan Police Services answered that there is no mention of crime in the Issues Document and the Local Plan should rectify this. The growth in housing and offices will require a complimentary growth in policing. The Metropolitan Police Services would appreciate having discussions about the local plan going forward and collecting CIL for police infrastructure.

Tooting Bec & Broadway Neighbourhood Forum commented that yes, consultation shows that there is a deficit of community facilities in Tooting. We would like the Council to work closely with Tooting Bec & Broadway Neighbourhood Forum to reach joint solutions within the context of a Neighbourhood Plan.

The Battersea Society responded that the current policy DMC2 seems adequate. Enable Leisure and Culture answered that the definition should not be changed or reduced as it would impact on Enable's ability to access CIL. Cllr Peter Carpenter of the Labour Party responded that yes, developers need to be clear about precisely what their community facilities obligations are.

NHS Property Services answered that the Council should continue to protect the retention of NHS facilities but there is conflict on the designation of health services under policies such as infrastructure or social and community facilities is contradictory. Need to develop policies which are more in line with NHS priorities. TFL Commercial Development commented that there should be a clearer definition of community facilities and one that is not overly rigid or overly flexible. Sports England responded that community facilities should be safeguarded through an audit.

**Council Response**

The Council acknowledges that the borough boundaries are not definitive when considering the usage of community facilities. As part of Local Plan Policy LP 17 (Social and Community Infrastructure), facilities are based on demonstrable need or demand, which could be from neighbouring boroughs. This policy still requires that where an NHS facility may be lost as part of a strategic programme that this may not be subject to the marketing requirements. The policy has overlooked this element which will be considered at Reg 19 stage.

Local Plan Policy LP 17 (Social and Community Infrastructure) aims to retain flexibility whilst giving some examples of the uses that would be applicable as community facilities.

The Local Plan highlights the impact positive planning can have on crime throughout the plan and in particular within Local Plan Policy LP 1 (Urban Design) which seeks to minimise opportunities for crime and antisocial behaviour. The Planning Obligation SPD understands that the impact of large-scale development on the Metropolitan Police Services has funding implications, and it is widely accepted that policing infrastructure can be included within CIL and s106 obligations. The Metropolitan Police Services is currently preparing a calculation formula to enable collection of financial contributions and this will be used when available by the Council.

**Question 88 What sort of facilities would you want to see provided alongside new development, to help create sustainable communities and walkable neighbourhoods?**

TFL commented that social infrastructure should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets Approach. NHS Property Services responded that health care facilities should be accessible, and funding should be acquired from CIL and developer contributions. Sports England commented that Sport England's Active Design guidance for further support in the form of 10 Active Design principles that should be considered when planning for new development would also be helpful in the preparation of these policies.

Port of London Authority answered that WBC should support the sport opportunity zone and encourage it through the Local Plan. Also encourage more residential moorings and visitor moorings. Cllr Peter Carpenter of the Labour Party suggested play areas, community clubrooms, cafes. Enable Leisure and Culture suggested covered cycle parking and showers for staff should be added to new developments to encourage active travel. Indoor MUGA to help me activity needs

Tooting Bec & Broadway Neighbourhood Forum requested that the Council to work closely with Tooting Bec & Broadway Neighbourhood Forum to develop proposals within the context of a Neighbourhood Plan.

The Battersea Society commented that this will depend on the nature of the development, existing local services and provision of facilities. They asked, what is a walkable neighbourhood? As they assume it will vary according to personal circumstances and needs.

**Council Response**

Local Plan Policy LP 17 (Social and Community Infrastructures) requires that new facilities are close or accessible to the community it is intended to serve by a range of transport modes including walking, cycling and public transport and is designed to be accessible for all, including for people with disabilities.

The Council will continue to work with and engage with Neighbourhood forums.

'Walkable neighbourhoods' are defined within the Living Streets initiative and characterised by having a range of (predominantly day to day) facilities within a walkable distance.

Local Plan Policy LP 61 (Riverside Uses, Including River Dependent, River-related, and River Adjacent Uses) A(6) of the Local Plan sets out our protect and enhance policy for river related sports and makes a particular mention of the Putney Embankment. The Playing Pitch Strategy will consider Sports Opportunity Zones.

**Question 89 Should the Local Plan aim to meet the need for social and community services in full within the borough or work with partners in neighbouring boroughs?**

Sports England answered that this is important for its evidence base. Cllr Peter Carpenter of the Labour Party commented that theatre and concert halls will provide benefits across the boroughs. The Battersea Society answered that pool resources across the borough's pm specialist services. All England Lawn Tennis Club commented that Wimbledon park gold course has acquired this land to continue with ambitions to continue to move Roehampton ground to main grounds of All England Lawn Tennis Club. A coordinated approach is required across boroughs in the formulation of future proposals for the use of the site.

NHS Property Services answered that the Local Plan should promote consultation between delivery partners and neighbouring boroughs when planning for strategic healthcare infrastructure. South West London & St George Mental Hospital - NHS Trust commented that the Council should work across boroughs to support the Estate Modernisation Programme for the NHS Trust

**Council Response**

The Spatial Vision and Objectives of the Local Plan sets out that the Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

The Council is producing an Arts and Culture Strategy. The Council will be working along with external stakeholders including residents, community groups, developers and arts organisations to develop this strategy.

The Council will continue to work with the All England Lawn Tennis Club on the application for the tennis grounds to be moved and ensure a coordinated approach.

**Question 90 What infrastructure is needed in Wandsworth over the plan period (15 years) and are there any particular sites or locations where they should be provided?**

Labour Group commented that public toilets should be a priority. Cycle parking sites, space for educational facilities. Wandsworth Society commented that schools, medical facilities and utilities need to be monitoring in light of new developments and increasing population. Port of London Authority commented more Riparian Life Saving Equipment and suicide prevention measures along the riverside.

Cllr Peter Carpenter, Labour Party responded that theatres and concert halls should be provided. Sports England responded indoor and outdoor sports facilities. Enable Leisure and Culture answered that further play provision, allotments and food growing spaces, swimming pools and leisure facilities should be provided.

Battersea Society answered that there is a need to ensure that physical development proceeds in partnership with statutory services i.e. the need is for a corporate strategic framework within which to set physical development and then details of the form that should take.

**Council Response**

The Open Space Study, Playing Pitch Strategy and Urban Design Study will all contribute to growing the Council's understanding of areas which are in need of greater resources including sports facilities, allotments and food growing provision.

An Infrastructure Delivery Plan will provide an infrastructure assessment for the borough which links into the Local Plan. The Infrastructure Delivery Plan sets out what is needed, where it is needed and when it is needed. It will also provide an update on the delivery of the required infrastructure to date. It also sets out the range of plans, programmes and strategies, including those of partner organisations and agencies. The Infrastructure Delivery Plan will inform part of the evidence base to inform the next version of the draft Local Plan (Regulation 19 version).

**Question 91 Which infrastructure has the potential to be co-located within larger multi-purpose buildings which can adapt to various uses?**

Cllr Peter Carpenter of the Labour Party answered most community facilities. Sports England commented that policies need to make use of school's sports facilities by the wider community and allow for more floodlighting.

NHS Property Services responded that NHS Clinics and other healthcare facilities can be co-located.

**Council Response**

Local Plan Policy LP 17 (Social and Community Infrastructure) understands that the use of a building and the needs of communities can change over time. In some cases, change might be inevitable or desirable, to meet the variable needs of users or through the efficient use of land through dual-use of facilities. Therefore, new community facilities should be designed to be flexible and adaptable to changing circumstances including being capable of multi-use and expansion.

Local Plan Policy LP 56 (Open Space, Sport and Recreation) sets out that proposals for new sports facilities are encouraged to promote multiple uses to meet the needs of the local community.

**Question 92 Should we include a policy on public toilets, being clear that new public accessible toilets should be provided for in new strategic developments?**

Cllr Peter Carpenter of the Labour Party commented yes, and we should also mandate changing facilities. Paul Reardon responded that there should be public toilets in locations with a high footfall. Ms Margaret Brett answered we need publicly accessible toilets in every centre. We also need public water fountains.

The Wandsworth Society; Sports England; Enable Leisure and Culture; The Putney Society; The Battersea Society; and Tooting Bec & Broadway Neighbourhood Forum answered yes.

**Council Response**

The emerging London Plan has policy S6 Public Accessible Toilets which states that public toilets should be provided as part of large-scale developments that are open to the public, such as shops, sport, leisure and health care facilities, transport hubs, cultural and civic buildings and large areas of public realm. The Local Plan therefore will not need to replicate this policy and can refer to the London Plan.

**Question 93 How can the Local Plan be more flexible in meeting the demand for school places?**

Paul Reardon responded that this should be secondary to creating schools within a short distance of one another. Cllr Peter Carpenter of Labour Party answered that schools should operate at a surplus as demand can change faster than schools can be built.

**Council Response**

Comments noted.

**Question 94 What else should the Local Plan consider in ensuring the educational needs of the borough are met?**

Cllr Peter Carpenter of the Labour Party commented that additional provision should be made for further education as the Government's Apprenticeship scheme rolls out. Enable Leisure and Culture recommended the Council ensure children have adequate playtime and consider whether off school pitch provision is adequate.

**Council Response**

Local Plan Policy LP 17 (Social and Community Infrastructure) supports the dual use of social, educational and community facilities, including by maximising the use of schools outside of core teaching hours, for a mix of sporting, social, cultural and recreational uses.



**Question 95 What policies are needed in the plan to deliver the health infrastructure needed to support growth?**

Cllr Peter Carpenter of the Labour Party commented that health policies are to provide increasing care in the community. This means that provision for expansion of GP facilities to meet a broader range of demands will be required, as will the expansion of local health centres. This may include the provision of additional sites.

Sports England answered that sport and recreation facilities are important contributors to the borough's health and well-being. The plan should acknowledge this link.

Enable Leisure and Culture responded that open space needs to be better appreciated for its contribution to health and well-being and to meeting the 4 key themes from the Active Wandsworth Strategy. There should be a greater effort to encourage Wandsworth residents to engage with art in order to reduce inequality and improve well-being.

**Council Response**

Local Plan Policy LP 56 (Open Space and Recreation) highlights the importance of open spaces, play areas, and sport and recreation facilities are important natural resources in Wandsworth. The extensive provision of play areas and open spaces in the borough, including formal and informal land and facilities for sport and recreation, close to homes and places of work, will contribute to encouraging healthier lifestyles as well as increased walking and cycling with positive health benefits.

Local Plan Policy LP 15 (Health and Wellbeing) acknowledges that healthy and active people tend to be less dependent on health and social care services so there are tangible economic benefits in encouraging and making it easy for the population to lead healthy lifestyles.

The Council is preparing an Arts and Culture Strategy. The Council will be working along with external stakeholders including residents, community groups, developers and arts organisations to develop this strategy. The Arts and Culture Team of the Council will also be leading on managing the Joint Cultural Needs Assessment (JCNA) working group of key internal stakeholders and few key external stakeholders (the Arts Council, BAC and the chair of the Wandsworth What Next Chapter) to assess the cultural needs of the borough.

**Question 96 How can the Council further support the health services in ensuring sufficient sites and support is available?**

NHS Property Services answered that as many NHS buildings become outdated it is important that they are reused properly. The Battersea Society responded that existing health support should be protected if they provide local provision within walking distance of catchments.

**Council Response**

Local Plan Policy LP 17 (Social and Community Infrastructure) promotes innovative ways of addressing constrained sites including through the use of shared facilities, meanwhile provision, off-site and multi-storey provision and that the use of any buildings are maximised in the evenings and at weekends. The Local Plan also recognises that in some cases, change might be inevitable or desirable, to meet the variable needs of users.

#### 4.8. Policies

**Question 97** Are there existing policies that you consider to be still relevant, need changing or are no longer appropriate or necessary? For each policy please explain why and be sure to set out any necessary changes that you think each policy might require.

Labour Group commented that it is dependent upon personal inclinations of respondent.

CBRE responded that new policies should be more permissive of the inclusion of other use classes where sites are redeveloped to help meet demand for these uses within the borough.

TFL responded that any changes to the site allocations document should consider the Crossrail 2 safeguarding directions 2015.

Battersea Society and Wandsworth Society answered that DMS1 should be more specific regarding street clutter, charging points and telecommunications pillars. DMS2 should have more specific management policies for conservation areas. DMS4 should require applicants for tall buildings to provide CAD drawings of the proposed development and the surrounding areas. DMS8 should be more detailed and stricter. Battersea Society also responded that DMS9: needs to be expanded to include Inlink and similar structures. DMH5 requires a basement policy. DMTS13 should prevent the use of new build apartment blocks for short term letting. DMO7: restrict the height of floating structures/ houseboats. DMT2: public communal package drop off depots should be encouraged to avoid delivery vehicles creating congestion. DMT3: restrict cycling on riverside walk and impose cycle speed limits.

Sports England commented that policies on Open Space should remain as they are.

#### **Council Response**

Due to the changes to Use Class Orders at national level developments coming forward will be more permissive of the inclusion of other use classes in the borough. CJ4 Land at Clapham Junction Station continues to be safeguarded as a worksite for Crossrail 2.

Local Plan Policy LP 1 (Urban Design) captures a lot of the policy criteria from DMS1 and encourages that the public realm be decluttered. Local Plan Policy LP53 (Parking, Servicing, and Car Free Development) requires Electric Vehicle Charging capacity is provided in accordance with the emerging London Plan and any subsequent amendments. Local Plan Policy LP23 (Utilities and Digital Connectivity Infrastructure) provides detailed guidance on the development of telecommunication pillars and seeks to reduce their impact on the character of the borough. The creation of Conservation Area Character Appraisals is outside of the Local Plan process. Local Plan Policy LP9 (Advertisements) is more detailed and specific than DMS8. Local Plan Policy LP23 (Utilities and Digital Connectivity Infrastructure) allows for digital connectivity apparatus such as InLink so long as it meets the criteria in the policy part C. The draft Local Plan includes Local Plan Policy LP6 (Basements and Subterranean Developments). Local Plan Policy LP62 (Mooring and Floating Structures) does not set a height limit to floating structures or houseboats but it does set out criteria which must be met which would prevent development inappropriate to the area. Local Plan Policy LP 51 (Sustainable Transport), supports development proposals which make freight movement safer, less polluting and more efficient. Where public communal drop off depots can be demonstrated to support this ambition, and are otherwise suitable, they would be supported. Where permission is sought for such uses, these will be assessed on a case by case basis. Local Plan Policy LP54 (Public Transport and Infrastructure) identifies the River Thames and Wandle as key routes for walking and

cycling and that where possible the riverside walks should allow for the provision of cycling ensuring pedestrian safety.

**Question 98 Should the new local plan seek to combine all policies into a single document? Please explain your answer.**

The Putney Society responded that the SSAD has turned out to be a waste of time since neither developers nor planning officers seem to take note of what it says, and many of the sites defined are not in single ownership, so don't come forward together.

Cllr Peter Carpenter of the Labour Party answered no that the document would be too massive and confusing. It's better that the relevant individual policies can be considered by interested parties. Battersea Society commented no as the documents have different functions and should remain separated. The Wandsworth Society and Clapham Junction Action Group commented that there should be a clear separation between Statutory Planning Policies and Guidance.

**Council Response**

Comments noted.

## Appendix

### Appendix 1: List of respondents

- All England Lawn Tennis Club (The AELTC)
- Gavin Scillitoe, BAF Graphics
- Ballymore Group
- Bendon Valley Lydden District
- CBRE
- Sinead Loftus, Chocolate Films Ltd
- Sarah Banham, Clapham Junction Town Centre Partnership
- Lucy Lewis, Clinical Commissioning Group
- Cllr Paul White
- Jan Lloyd, Covent Garden Market Authority
- Simon Ingyon, Enable Arts
- Celeste Giusti, GLA
- Katie Parsons, Historic England
- Ms Margaret Brett
- Lynne McNulty
- Mrs Laura Fletcher-Gray
- Tim Price
- Sue Jones
- Paul Reardon
- Peter Carpenter, Labour Party
- Innova Investments Partnership
- Ipsus Developments Ltd
- Catherine Carpenter, Lambeth Council
- Shahina Inayathusein, London Underground LTD
- Metropolitan Police Service
- Evelyn Jones, MHS Property Services
- Spencer Jefferies, National Grid
- Michael Atkins, Port of London Authority
- Positively Putney
- Putney High Street Development
- Mr Andrew Catto, Putney Society
- Melanie Murphy, Royal Academy of Dance
- Safestore
- South West London & St George mental hospital - NHS Trust
- Vicky Aston, Sport England
- Natalie Chan, TFL
- Jack Conroy, TFL – Commercial development
- David Wilson, Thames Water
- The Collective
- Mr Tom Clarke, Theatres Trust
- Mr Mike Potter, Tooting Bec & Broadway Neighbourhood Forum
- TR Property Investment Trust PLC

- Travis Perkins (Properties)
- Workspace Group
- Cllr Graeme Henderson
- Cllr Jo Rigby
- Jo Martyn, Environment Agency
- Spencer Jefferies

For more information write to:  
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