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Planning Policy, Environment &
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Department: Planning

Our reference: LDF32/LDD09/ LP04/MJ02
Date: 17 March 2023

By email: adam.hutchings@richmondandwandsworth.gov.uk
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Dear Adam,

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Wandsworth Local Plan Main Modifications and Policy Map Changes

Thank you for consulting the Mayor of London on the Wandsworth Local Plan (WLP) Main Modifications and Policy Map Changes. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments in his Regulation 19 response dated 28th February 2022 raising a general conformity issue with the London Plan due to the proposed approaches to the management of the borough's industrial land. The Mayor also raised other concerns related to safeguarded wharves protection, waste capacity gap, and housing.

Since then, GLA officers have worked together with Wandsworth officers to sign a Statement of Common Ground that suggested proposed modifications to bring the WLP in general conformity with the London Plan. In response to the Inspectors' Matters, Issues and Questions, the Mayor provided a written statement and the GLA officers discussed these issues in the Examination hearings. The Mayor welcomes the Main Modifications that seek to address the conflict with the London Plan on the approaches to Industrial Land and a number of other issues raised as part of the previous consultations, Written Statements and Examination hearings – but some important issues remain outstanding.

Therefore, this letter sets out where you should make further amendments so that the WLP is consistent with the London Plan.

The London Plan ten-year Housing Target

During the Examination hearings, the Home Builder's Federation raised an issue that the WLP does not roll forward the ten-year London Plan target for the years 2019/20 to 2022/23 in the housing target set in SDS1 at 20,311 homes. While the HBF sought clarification if the housing trajectory shows that the ten-year London Plan target can be delivered, it brought to the GLA's attention an inconsistency between the WLP and the London Plan. There is a factual error in the WLP housing target as it does not bring forward any deficit (see calculations below) accrued during the four years of the ten-year London Plan target period (2019/20-2028/29) before the Local Plan period begins (2023-2038). The inspectors suggested that GLA and Wandsworth officers should resolve this outside the hearing sessions.

GLA officers explained in communications with Wandsworth that the London Plan sets out a ten-year housing target for boroughs, which is 19,500 for Wandsworth as set out in Policy H1, Table 4.1 (which could be delivered as an average of 1,950 homes annually over the ten-year period of 2019 – 2029). Currently the WLP housing target relies on an annual target of 1,950 homes (an annual target is not set out in the London Plan) and it disregards the four years (2019 – 2022) before the Local Plan period begins. This undermines the ten-year London Plan housing target where the Local Plan period starts later than 2019. The GLA provided Wandsworth officers with a number of factual amendments to the plan for their consideration as part of the process of preparing the Main Modifications.

The Mayor welcomes MM3 to Policy SDS1 Spatial Development Strategy 2023-2038 that updates the ten-year housing trajectory table with actual and projected completions based on their 2021/22 Housing AMR. This demonstrates an expectation to meet the ten-year London Plan target.

However, the Mayor is concerned that the GLA's proposed amendments have not been incorporated into the Main Modifications. As a result, the plan does not acknowledge the ten-year London Plan housing target in the Local Plan Policy SDS1 A that sets out Wandsworth's housing target figure at 20,311 homes in the Plan period 2023 to 2038. Based on the housing trajectory set out in the table under paragraph 2.104, there is a shortfall of 889* homes (see calculations below) in the four years from 2019/20 to 2022/23 before the Local Plan period begins. This shortfall of 889 homes should be accounted for in WLP housing target in the first six years of the Local Plan (2023-2029) that overlap with the ten-year London Plan housing target period.

Accounting for the 889 homes will mean the overall WLP housing target needs to increase to 21,202 homes [889 shortfall + 1,950 per annum over remaining 6 years from 2023-29 + 957 annual target beyond 2029 for 9 years until the end of the Local Plan period in 2038].

*Calculations for 889 homes shortfall:

Year	Projected completions 2021/22 Housing AMR	Deficit/surplus against 1,950
2019/20	1359	-591 [1,359-1,950]

2020/21	1470	-480 [1,470-1,950]
2021/22	1974	+24 [1,974-1,950]
2022/23	2,108	+158 [2,108-1,950]
Total deficit in 4-year period		-889

Therefore, the Mayor recommends that the Policy SDS1 A and supporting text should be amended to include the ten-year London Plan Housing Target in its entirety. Here are the suggested edits:

- Policy SDS1 A: Within the period 2023 – 2038 the Local Plan will provide for a minimum of ~~20,311~~ 21,202 new homes. This includes the provision of ~~thea minimum of 1,950 new homes per year~~ ten-year London Plan target of 19,500 new homes up until 2028/2029 as per Table 4.1 in the London Plan, including on small sites. The small sites provision across the entire Plan period will account for a minimum of 414 new homes per year.
- Paragraph 2.104: The number of new homes to be provided between 2023 and 2038, as set out in SDS1, through a stepped housing target has had regard to the housing target for the borough set out in the London Plan of a minimum of ~~1,950~~ 19,500 dwellings ~~per annum~~ over the period from 2019/20 to 2028/29.

The new Appendix 1 in MM254 Appendices that shows the trajectory/pipeline for the Local Plan period against the target defined by the London Plan should be amended to account for the entire ten-year London Plan target of 19,500 homes from 2019/20 to 2028/29 and the shortfall of 889 homes that is identified based on the housing trajectory in the table under paragraph 2.104 in Policy SDS1.

The housing target for the first 6 years of the WLP should be: $1,950 \times 6 + 889 = 12,589$, which when spread equally across 6 years comes out to 2,098 per annum. Therefore, the target figures in the Appendix 1 table for 2023/24 to 2028/29 (6 years of the Plan period) should be modified from 1,950 to 2,098.

Safeguarded Wharves

The Mayor had previously objected to the implication of de-designation of Safeguarded Wharves to allow for mixed use residential schemes, specifically paragraph 4.173 Site Layout in Site Allocation WT22 Pier Wharf. Based on the Safeguarded Wharves Review which finds this wharf in active use – and noting its particularly high throughput relative to its size, the Mayor advised that the site allocation text be modified to recognise the strategic role and long-term protection of this safeguarded wharf. Wandsworth officers had agreed, during the hearing sessions and in subsequent email conversations, to include the deletion of para 4.173 as part of the Main Modifications.

The Additional Modifications 25 only adds reference to LP40 Safeguarded Wharves policy - 'Should the safeguarded wharf be de-designated (*in line with LP40 - Protected*

Wharves then a mixed-use residential scheme could come forward.’ As was mentioned previously during the hearing sessions and in the GLA’s Written Statement, adding a reference to the policy does not address the concern regarding the implication that an active safeguarded wharf could be de-designated for redevelopment.

The Mayor notes that the modification MM25 (Erratum) to Site Allocation WT11, Western Riverside Waste Transfer Station, paragraph 4.105 Site Layout adds the term ‘de-designated’ for this Safeguarded Wharf as well which raises the same concern – an implication that the waste transfer facility may be de-designated to enable a mixed-use residential scheme to come forward. The Mayor recognises that under this site allocation description (which is missing in site allocation WT22) and Policy LP 40 Safeguarding Wharves, there is a clear intention to protect the current use of the safeguarded wharf and to align any development with the Agent of Change Principle as set out in London Plan Policy D13. However, the WLP has not identified opportunities to fill the waste capacity gap of 2.1 hectares to meet its waste apportionment targets. The Wharf is safeguarded for retention of use (as per Safeguarded Wharves Review), so the Mayor is concerned that the plan could be read as supporting the de-designation of a safeguarded wharf currently used for waste transfer.

The Mayor recommends that the wording of all Safeguarded Wharves site allocations be checked and modified, if necessary, to make it consistent with the intention of Local Plan Policy LP40. This would address the risk that the plan could be misinterpreted as supporting de-designation of the safeguarded wharves and de-commissioning of their current active uses. The site allocations can work without the use of the word ‘de-designation’.

The Mayor also notes that there are many places in the draft Plan where LP40 Protected Wharves references are not modified to reflect the title change to LP40 Safeguarding Wharves.

Employment

The Mayor welcomes the Main Modifications across the document to reflect the proposals the GLA suggested to ensure general conformity with London Plan Policy E4 and E7 and to reflect the demand for B8 uses as identified in LBW’s Housing and Economic Land Availability Assessment (HELAA). The Main Modifications have achieved this by (i) re-aligning the Battersea Design Technology Quarter boundary to exclude heavy industrial uses in the Strategic Industrial Land; (ii) by designating BDTQ as Locally Significant Industrial Area (LSIA) that better reflects the land uses in the ongoing and upcoming planning applications; (iii) inclusion of language such as ‘preference to accommodate B8 uses’ and ‘new industrial uses should be introduced on the ground floor, with units designed to accommodate B8 uses,’ in areas where industrial intensification is expected to contribute to the 30,500 sqm demand for B8 uses as per the Employment Land and Premises Study (ELPS) 2020, (iv) recognising industrial uses such as the Safestore site must be retained and protected which falls within the newly drawn BDTQ boundary, and (v) creating a new NE8 Battersea Studios

site allocation separate from the BDTQ cluster to better align with the site's location within SIL.

Energy Infrastructure

London Plan Policy SI 3 Energy Infrastructure emphasises the importance of heat networks which are still considered to be an effective and low-carbon means of supplying heat in London, and offer opportunities to transition to zero-carbon heat sources faster than individual building approaches. The GLA has produced an updated Energy Assessment Guidance (June 2022), to keep in line with the updated Building Regulations (June 2021), which also underscores the importance of heat networks and considers the improving technology to achieve greater energy efficiency.

The borough may wish to delete the reference to 2013 Building Regulations in LP10 paragraph 15.16 to acknowledge the already updated Building Regulations (June 2021) so that the Local Plan when adopted is not already out of date. The GLA's Energy Assessment Guidance Section 2 explains how London Plan policies apply, now that Part L 2021 has taken effect.

Other modifications

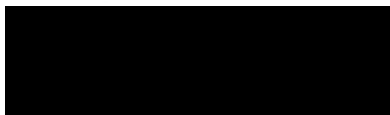
The Mayor welcomes the Main Modification MM175 within LP13 Circular Economy, Recycling and Waste Management that emphasise the commitment to working toward closing the waste capacity gap with operators and other stakeholders to proactively encourage delivery of additional waste management capacity and may seek help from other London boroughs to meet the apportionment target.

The Mayor also welcomes the Main Modifications MM179 to MM182 within LP23 Affordable Housing to provide clarity on First Homes and Threshold Approach as agreed within the Statement of Common Ground.

Next steps

I hope these comments inform the preparation of the Wandsworth Local Plan and we look forward to continuing to work with you to ensure it aligns with the London Plan as well as delivering Wandsworth's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Monika Jain at monika.jain@london.gov.uk

Yours sincerely



Lisa Fairmaner

Head of the London Plan & Growth Strategies

Cc Leonie Cooper, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC



Annex 1

planningpolicy@wandsworth.gov.uk

[by email only]

17 March 2023

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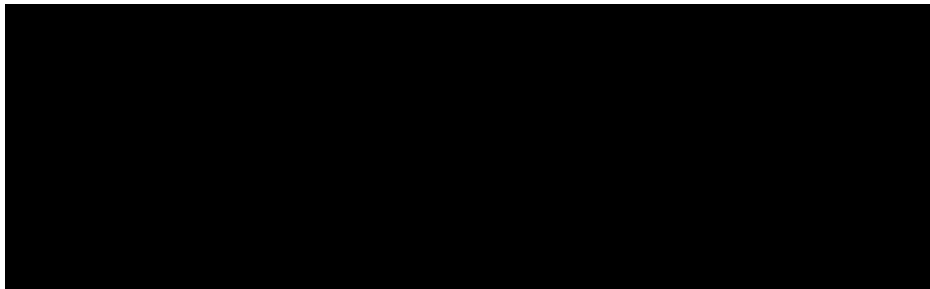
Wandsworth Local Plan Main Modifications

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Transport Trading Limited Properties to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the proposed Main Modifications to Wandsworth Local Plan. Although we would like the Local Plan to have gone further in a few areas, the amendments made to transport policies and site allocations are positive, and subject to some minor amendments, will ensure overall consistency with London Plan transport policies. We welcome changes to a number of site allocations that no longer require re-provision of car parking.

We have set out a number of detailed comments on the following pages which we hope are helpful. We look forward to continuing to work together to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth.

Yours Sincerely,



Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

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Appendix A: Specific suggested edits and comments from TfL on the Wandsworth Local Plan Main Modifications

Reference	Section	Comment
MM93	CJ5, Winstanley / York Road Regeneration Area	We welcome the insertion of a new paragraph in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'Public Transport - Development may need to improve York Road in terms of public transport as well as provide and maintain facilities for sustainable travel include bus standing and turning on site.'</i>
MM101	PUT1, Wereldhave site, 56-66 Putney High Street	We welcome the amended wording of paragraph 7.18 in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'Parking - Consider provision of public car parking on the site with 2-hour limit and improve access to the site. Car club provision for residential/commercial use and surrounding area would be appropriate.'</i>
MM110	TO3, 50 – 56 Tooting High Street, Tooting,	We welcome the amended wording of paragraph 8.34 in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'8.34 Access – The parking and access to the west should be <u>redeveloped</u> retained with public realm enhancements provided for pedestrians.'</i>
MM111	TO3, 50 – 56 Tooting High Street, Tooting,	We welcome the amended wording of paragraph 8.35 in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'Parking – Servicing should take place directly from the Garratt Lane frontage subject to the constraints of the bus bays.</i>
MM140	OUT3, Springfield Hospital, Burntwood Lane / Glenburnie Road,	We welcome the insertion of a new paragraph in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'Parking – Measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.'</i>

Reference	Section	Comment
MM143	OUT5, Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London	<p>We welcome the insertion of a new paragraph in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below.</p> <p><i>'Development Consideration</i> <i>Parking - Measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.'</i></p>
MM238	LP51 Parking, Servicing and Car Free Development	<p>Although we would have preferred wording that better reflected the approach of the London Plan, we welcome amended wording which was agreed verbally at the EiP Hearing in order to address TfL's Reg. 19 representation and written submission on matter 19 regarding the London Plan requirement for car free development in Opportunity Areas as set out in part 2 below. However, the wording should make it clear that car free development will be required where the PTAL is 4 or higher OR in an Opportunity Area to ensure consistency with the London Plan. As drafted it could be read that both conditions 1 and 2 need to be fulfilled which would be contrary to the London Plan. The word OR should be inserted after clause 1 to ensure soundness.</p> <p><i>'D. Car-free development will be required where:</i></p> <ol style="list-style-type: none"> <i>1. The PTAL is 4 or higher. OR</i> <i>2. <u>In an Opportunity Area, unless specific circumstances can be demonstrated where the provision of parking can be justified.</u></i> <i>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. A Transport Assessment shall demonstrate how reductions in the need to travel can be achieved. A Transport Assessment will not be required if the development meets London Plan Parking Standards.</i> <i>4. The appropriate minimum number of disability friendly parking spaces are provided in accordance with the London Plan and any subsequent amendments.'</i>

Reference	Section	Comment
MM239	LP51 Parking, Servicing and Car Free Development	<p>We note amended wording to LP51 E which is consistent with changes to LP51 D.</p> <p><i>'Low car development will be required where:</i></p> <ol style="list-style-type: none"> <i>1. The PTAL is 3.</i> <i>2. 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. A Transport Assessment shall demonstrate how reductions in the need to travel can be achieved. A Transport Assessment will not be required if the development meets London Plan Parking Standards.</i> <i>3. The appropriate minimum number of disability friendly parking spaces are provided in accordance with the London Plan and any subsequent amendments.'</i>

Reference	Section	Comment
MM240	LP51 Parking, Servicing and Car Free Development	<p>Although we would have preferred the paragraph about parking for key workers, inserted at the Regulation 19 stage, to be deleted entirely, we welcome the amended wording in paragraph 20.36. The modification addresses TfL’s main concerns that the prioritisation of key workers should only apply to the allocation of car parking where it is provided within the standards and does not support any exceptions from the London Plan parking standards. This position was set out in the TfL Statement of Common Ground and in our written submission on matter 19 where we confirmed that paragraph 20.36 as amended below would no longer conflict with London Plan parking policies</p> <p>‘The Council supports the provision of car parking spaces for key workers within new developments. The Mayor of London is currently producing a list of key workers which Wandsworth will use to provide guidance on the distribution of car parking spaces that are created for key workers. Additionally, Car Parking Zone policies will be amended to allow key workers who require use of a vehicle greater access to parking permits. Within the parameters of Policy LP51, and where parking is to be provided at new housing developments, the Council will prioritise key workers in the allocation of car parking spaces. The Mayor of London has produced a list of key workers (contained within the Housing Policy Practice Note, ‘Allocating intermediate homes to London’s key workers’, December 2021), and this will provide a basis for the definition of key workers. The Council’s priority is to help those key workers on lower incomes, with a place of work away from their own home, to travel to work where public transport options are more limited. This support, therefore, is more likely to be appropriate where developments are providing affordable housing in locations with poor PTAL ratings.’</p>
MM241	LP52 Public Transport and Infrastructure	<p>We welcome amended wording in policy LP52 A.1c <i>'consultation has been undertaken with operators, owners and stakeholders including TfL.'</i></p>

Reference	Section	Comment
MM242	LP52 Public Transport and Infrastructure	<p>We welcome additional wording in policy LP52 after part A.1c</p> <p><u>'2. Land will be safeguarded for future transport functions where necessary. New and additional land for transport functions and infrastructure will be sought to address deficiencies in provision and/or to accommodate expected future demand. Financial contributions to public transport improvements and other transport infrastructure can be made in lieu of provision in special circumstance.'</u></p> <p>We also welcome the separation of part B from the references to Thames and Wandle riversides</p> <p><u>'B. Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)).'</u></p>