

Wandsworth Planning Obligations Supplementary Planning Document (SPD)

Consultation Report

December 2025

About the consultation

The Planning Obligations SPD provides borough-wide guidance on the way in which planning obligations will be sought on planning applications to mitigate the impacts of developments. It supports the policies set out in the [Wandsworth Local Plan](#) (July 2023). The draft version consulted on would replace the existing [Planning Obligations SPD](#) (2020) to reflect changes to legislation and policy context.

A four-week public consultation ran from Tuesday 2nd September to Tuesday 30th September 2025.

Representations could be made by any persons:

- via the online consultation platform
- By email to planningpolicy@wandsworth.gov.uk
- By post to Spatial Planning & Design, Wandsworth Council, Wandsworth High Street, London, SW18 2PU

A response form was provided.

Who was consulted?

Letters and emails were sent to both statutory and non-statutory consultees on the Council's Local Plan database which consists of individuals and organisations who are either prescribed bodies for the purposes of consultation or had requested to be notified of consultations on local development documents. These letters and emails gave notification of the consultation and the consultation period; how to access the document; how to make a representation; and contact details to find out further information.

Paper copies were made available, together with paper response forms, in the borough's main libraires (Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth) and the Town Hall Reception. Information was given regarding the consultation and who to contact for further information.

Details of the consultation were posted on the Council's [Planning Policy Consultation](#) webpage and on the Council's Consultation Engagement Hub ([Citizen Space](#))

Summary of Response to the consultation:

Responses from 11 individuals or organisations were received to the consultation. Details of the consultation responses, the Council's responses to the comments, and any amendments made to the final document are detailed in the appendix.

The key points raised in response to the consultation included:

- Thames Water supports the SPD's focus on ensuring adequate water and wastewater infrastructure and recommends early engagement with developers to assess capacity needs. They highlight the importance of addressing sewer flooding risks, including those outside floodplains, and advocate for sustainable drainage systems to reduce pressure on foul sewers. In response, the Council has noted the comments and made amendments to paragraphs 6.20 and 6.24 to reflect these suggestions.
- The respondent from TfL asked for additional information to be included on certain matters such as the need to strengthen obligations for sustainable transport, active travel infrastructure, and public realm improvements. In response, the SPD was amended to include enhanced guidance on Delivery and Servicing Plans, active travel measures, and strategic transport contributions, with updated wording and expanded requirements across relevant sections.
- DPDS, on behalf of Mr Stuart Gulliver, support the SPD's overall approach, but suggests strengthening triggers for planning obligations in areas such as the historic environment, flood risk, and affordable workspace. They recommend clearer guidance for riverside and tall building developments and argue that financial contributions in lieu of on-site mitigation should be a last resort. The Council has noted these comments and provided clarification, but no material changes have been made to the SPD at this stage.
- Historic England supported the continued integration of heritage considerations and proposed minor amendments relating to archaeology. In response, the SPD was updated to reference the Wandsworth Archaeological Priority Area Appraisal (2017), clarify early consideration of archaeological remains in paragraph 5.8, and expand paragraph 5.9 to include public engagement and display of archaeological sites as potential planning obligations.
- Battersea Society Open Space Committee raised several issues including the need for clearer distinctions between CIL and s106, stronger emphasis on enhancement over mitigation, and improved guidance on active travel, public safety, and early design engagement. In response, clarifications were provided regarding funding mechanisms and the role of other strategies, and additional wording was added to Section 10 to support active travel. No material changes were made to other sections, but the feedback will inform future policy development.
- The Environment Agency welcomed the inclusion of flood risk and environmental infrastructure in the SPD but requested updates to ensure alignment with current projects and data. In response, paragraph 6.23 was revised to remove outdated references and clarify the need for developer engagement with the Environment Agency. Additional wording was added to support site-specific environmental infrastructure and flood defence measures, particularly near the Thames. Paragraph 11.10 was amended to include references to relevant river restoration datasets. Other comments regarding thresholds and triggers were noted, but no further changes were made.
- Battersea Society Planning Committee welcomed the clarity of the revised SPD and its alignment with Local Plan policies. They suggested closer integration with the Council's

Growth Strategy and a stronger emphasis on community infrastructure and placemaking. While no changes were made in response, the SPD acknowledges that major applications will consider the most recent Council strategies. A correction has been made to Appendix 1 to include missing information about planning obligations under the Historic Environment category.

- Comments supported stronger emphasis on cycling infrastructure and safety standards in new road design. In response, Section 10 was updated to include a link to Wandsworth's Walking and Cycling Strategy. Suggestions regarding historic street surfacing were noted, but no changes were made as these are considered more appropriate for detailed design guidance.

Planning Obligations Supplementary Planning Document

Appendix 1: Schedule of Consultation responses, Council comments and changes made

This document includes all responses received to the consultation on the draft *Planning Obligations Supplementary Planning Document*, the Council's responses and any changes made to the final SPD as a result.

Note that comments / submissions from respondents are included in the table in the form in which they were written. They are not alphabetically ordered or in any other order of priority. Note additions/changes to the consultation draft SPD are shown in **red text**.

Consultee ID	Name / Organisation
01	David Wilson, Thames Water
02	Samantha Rose, National Highways
03	Richard Carr, TfL
04	Vickesh Rathod, DPDS, obo Mr Stuart Gulliver
05	Sharon Jenkins, Natural England
06	James Preece, Historic England
07	Clare Graham, Battersea Society Open Space Committee
08	Ajit Gill, Environment Agency
09	Chair, Battersea Society Planning Committee
010	Vicky Aston, Sport England
011	Tim Partington

Consultee name	Organisation details	ID	Comments	Council response	Changes made to the final version of the SPD
Draft Planning Obligation SPD 2025					
David Wilson	Thames Water	01	<p>We support paragraphs 6.24-.6.25.</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. We therefore support the SPD reference that the council will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments.</p> <p>It is Thames Water's understanding that Section 106 Agreements cannot be required to be used to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>Water and sewerage undertakers also have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing and Local Plan policies or the use of conditions attached to planning permissions.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling. From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Information on how off site network reinforcement is funded can be found here</p>	Support noted.	No change

Consultee name	Organisation details	ID	Comments	Council response	Changes made to the final version of the SPD
			https://developers.thameswater.co.uk/New-connection-charging Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the NPPF) to establish the following: <ul style="list-style-type: none"> • The developments demand for water supply and network infrastructure both on and off site; • The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. Thames Water offer a Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's pre planning service are available at: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/water-and-wastewater-capacity 		
David Wilson	Thames Water	01	<p>We therefore support paragraphs 6.24-6.25. In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas.</p> <p>By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p>	Comments noted	No change

Consultee name	Organisation details	ID	Comments	Council response	Changes made to the final version of the SPD
David Wilson	Thames Water	01	Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.	To acknowledge concerns raised about the risk of flooding occurring outside designated floodplains due to inadequate sewer infrastructure wording added. The additional wording ensures the SPD reflects the need for developments to consider all sources of flooding, including sewer flooding.	<p>Add wording to 6.20:</p> <p>'Policy LP12 (Water and Flooding) requires developments to demonstrate that they will avoid or reduce the risk of fluvial, tidal, surface water and other types of flooding and manage residual risks through appropriate flood risk measures, including the use of a range of Sustainable Drainage Systems (SUDS) appropriate to the various parts of the Borough.</p> <p>Proposals should also acknowledge the risk of sewer flooding, which can occur away from floodplains where off-site sewer infrastructure is inadequate or not delivered ahead of development.'</p>
David Wilson	Thames Water	01	With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not	Comment noted	No change

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			only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.		
David Wilson	Thames Water	01	With regard to surface water drainage, Thames Water request that the following paragraph should be included in the SPD: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”	In order to provide further guidance to developers the suggested wording will be incorporated.	Add wording to para 6.24: “Developers are encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”
Samantha Rose	National Highways	02	We understand each of the three SPDs has been prepared to provide further guidance for how planning applicants should address certain issues when seeking planning permission. We have no comments on the three documents. We will continue to discharge our statutory consultee responsibilities and will work collaboratively with the Council and planning applicants to manage development and ensure the effective operation of the SRN.	Response noted (no comments)	No change
Richard Carr	Tfl	03	<u>Section 3 – Overview of Planning Obligations Required</u> Table 3 - Under the heading of ‘Sustainable Transport’ the list of planning obligations should also include:	Agreed	Securing measures or contributions towards highways All applications improvements and sustainable transport. These may include:

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			<ul style="list-style-type: none"> Improvements to active travel (walking and cycling) infrastructure and enhancements to the public realm Measures within Delivery and Servicing Plans (DSPs) 		<ul style="list-style-type: none"> Measures within Construction Logistics Plans (CLPs) Measures within Delivery and Servicing Plans Measures within travel plans Site specific highways improvements (S278 Agreements) Improvements to active travel (walking and cycling) infrastructure and enhancements to the public realm Financial contributions towards public transport improvements EV charging points Car club operation and membership for residents Parking restrictions
Richard Carr	TfL	03	<p><u>Section 4 – Placemaking (Area Strategies)</u></p> <ul style="list-style-type: none"> 4.3 Transport and Connectivity <p>The second bullet point (page 15) should be amended to read ‘Improvements to sustainable transport infrastructure, including enhancements to specific railway and Underground stations and interchange improvements identified in the Local Plan, Infrastructure Delivery Plan and emerging Clapham Junction Masterplan SPD.’</p>	Agreed	Improvements to sustainable transport infrastructure, including enhancements to specific railway and Underground stations and interchange improvements identified in the Local Plan, Infrastructure Delivery Plan and emerging Clapham Junction Masterplan SPD
Richard Carr	TfL	03	<p><u>Section 10 - Sustainable Transport</u></p> <p>Planning Considerations</p>	Agreed	Updated hyperlinks: Transport Assessments

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			<p>The hyperlinks pointing to TfL guidance on Transport Assessments and Travel Plans in section 10.10 will need to be updated as the guidance has been moved to different locations on the TfL website.^[1]</p> <p>Requirements</p> <p>Additional sections of text should be added to this section in relation to active travel infrastructure and measures within Delivery and Servicing Plans. These are in line with the suggested amendments to Table 3 (above).</p> <p>1 - Providing guidance on planning obligations to secure improvements to active travel infrastructure including new or improved walking and cycling routes, measures to prioritise active travel, provide cycle parking or storage, expand cycle hire provision or to secure enhancements to the public realm.</p> <p>2 – Providing guidance on planning obligations to secure measures within Delivery and Servicing Plans including provision of off-street loading, pick up or drop off facilities and facilities for cargo bike deliveries. This could follow the template of 10.15 – 10.16.</p> <p>^[1] Guidance for planning applicants - Transport for London Travel plans - Transport for London</p>		<p>Travel Plans</p> <p>After 10.14:</p> <p>Measures within Delivery and Servicing Plans Where there is a Delivery and Servicing Plan for a new development, Planning Obligations may be used to secure measures such as provision of off-street loading, pick-up or drop facilities and facilities for cargo bike deliveries.</p> <p>After 10.16:</p> <p>Improvements to active travel infrastructure Planning obligations will be used to provide a high-quality walking and cycling infrastructure to encourage active travel, including new or improved walking and cycling routes, measures to prioritise active travel, provide cycle parking or storage, expand cycle hire provision or to secure enhancements to the public realm.</p>
Richard Carr	TfL	03	<p><u>Site specific highways improvements</u></p> <p>The final bullet point should be expanded to read ‘footway or crossing improvements’. An additional bullet point should be added: ‘cycle infrastructure improvements’.</p> <p><u>Financial contributions towards public transport improvements</u></p> <p>The first sentence of 10.19 should be expanded to read ‘In some cases, improvements, amendments</p>	Agreed	<p>10.17 Planning obligations may be used to secure site-specific highways improvements necessary to make a development acceptable. Examples of works that may be required include:</p> <ul style="list-style-type: none"> • traffic calming measures; • new road alignments,

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			<p>or additions to public transport services or infrastructure...</p> <p><u>13 Appendix 1: Delivery Mechanisms for Planning Contributions</u></p> <p>The final entry titled 'Strategic Transport Improvements' should replace 'No' with 'Yes' in the Planning Obligations column. Although some strategic transport projects may be delivered through Wandsworth CIL, there are some projects such as step free access improvements at rail and Underground stations, interchange improvements and bus infrastructure or service improvements that may need to be part funded through site specific planning obligations.</p>		<ul style="list-style-type: none"> • junction improvements; and • footway pedestrian improvements; • cycle infrastructure improvements. <p>10.19 In some cases, improvements, amendments or additions to public transport services or infrastructure which are directly related to a development site and necessary to make the proposed development acceptable in planning terms, may also be required, particularly where new transport, traffic, pedestrian, or cyclist demand is generated or if there are significant transport impacts.</p> <p>Appendix 1: Delivery Mechanisms for Planning Contributions Table 6 – Strategic transport infrastructure projects – Specific requirement No (unless pooled with contributions from other sites)</p>
Vickesh Rathod, DPDS, obo Mr Stuart Gulliver	DPDS	04	<p>We welcome the intent of this SPD to set out the Council's approach to securing planning obligations through the development management process and providing detailed guidance on how planning obligations will be determined and applied in relation to different types of development in the borough.</p> <p>The tabulated format at Section 3 is particularly helpful for developers and other stakeholders to identify the</p>	Noted	No change

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			<p>relevant thresholds and triggers for potential planning obligations.</p> <p>We also welcome that ‘major applications’ are required to meet planning obligations across a wide range of policy areas, however we have some specific comments as to how the requirements for obligations in several policy areas could be strengthened or made clearer to developers</p>		
Vickesh Rathod, DPDS, obo Mr Stuart Gulliver	DPDS	04	With regards to Historic Environment, we note that the trigger for planning obligations is “Where the development has a harmful impact on the historic environment that requires mitigation and this mitigation cannot be fully addressed through design or use of conditions”. We believe that the wording of this trigger should be strengthened, to make clear to developers that it applies to both tangible and imperceptible harmful impacts on the historic environment. For example, the 28-storey proposal at 1 Battersea Bridge Road (ref. 2024/1322) referred to above had the potential to harmfully impact the foundations and structural integrity of the Grade II listed Battersea Bridge. Although these impacts might not be directly visible, they are still significant, and developers should be required to mitigate such harm through planning obligations if not through design	Historic environment is a broad consideration and impacts relating to specific applications will be assessed against the relevant legislation and policies in the Local Plan.	No change
Vickesh Rathod, DPDS, obo Mr Stuart Gulliver	DPDS	04	With regards to Water and Flooding, we note that the trigger for planning obligations is “Where flooding measures are necessary to make the development acceptable in planning terms and the required measures cannot be secured through other means e.g. design or planning condition”. We are of the view that this obligation should be triggered by all riverside developments given the sensitivity of the location, and this trigger should be clearly communicated to developers in the final SPD	The Council acknowledges the particular sensitivity of riverside locations to flood risk. However, the approach set out in the SPD aligns with national planning policy and guidance, which requires that planning obligations are only sought where they are necessary to make a development acceptable in planning terms. While not all riverside developments will require obligations, the SPD provides a framework to assess each case on its merits, ensuring that appropriate mitigation is secured where justified.	No change
Vickesh Rathod, DPDS, obo Mr Stuart Gulliver	DPDS	04	With regards to Affordable and Open Workspace, we note that the threshold for planning obligations (i.e. Provision of the relevant proportion of employment space as open or affordable workspace) is “developments of 1,000 sqm of gross economic	Policy applies to proposals for employment floorspace, of which a proportion is required to be affordable workspace	No change

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			floorspace”. We believe that this should also apply to developments which are resulting in the loss of gross economic floorspace, (as was the case for planning application ref. 2024/1322 at 1 Battersea Bridge Road) and this threshold should be clearly communicated to developers in the final SPD		
Vickesh Rathod, DPDS, obo Mr Stuart Gulliver	DPDS	04	<p>We note that for the following policy areas, reference is made to ‘exceptional circumstances’ which can be used to make the case for off-site contributions in lieu of on-site mitigation:</p> <ul style="list-style-type: none"> • Carbon Reduction • Air Quality • Play Space • Open Space • Biodiversity • Trees <p>We are of the view that financial contributions in lieu of on-site mitigation should be a last resort, and the bar should be set high for demonstrating exceptional circumstances. For example, a small site footprint should not be an exceptional circumstance – this simply means that the site is not capable of delivering/mitigating the scale of development proposed.</p> <p>We believe that there would be benefit in making explicit reference to ‘tall buildings’ proposals under relevant thresholds/triggers, so that developers of such schemes are clearly aware of what obligations they are required to meet. These obligations should be communicated to developers as early as possible, such as the pre-application stage.</p>	<p>On individual developments there may be reasons why certain requirements can’t be delivered on site, however the SPD makes clear that this should only be in exceptional circumstances.</p> <p>Tall buildings are classed as major developments.</p>	No change
Sharon Jenkins	Natural England	05	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Comment noted	No change
James Preece	Historic England	06	Thank you for the opportunity to comment on the above consultation document. Historic England is keen to ensure that the protection of heritage assets is fully considered at all stages and levels of the planning process. In line with our previous comments on an earlier iteration of the Planning Obligations SPD in 2020, we are pleased to see that heritage considerations continue to be well integrated. We support the approach that you have taken with regards	See below	See below

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			to planning obligations and heritage and we look forward to this aspect of the SPD continuing to be applied as part of the Council's commitment to proactively managing Wandsworth's historic environment. We have some minor suggested amendments in relation to archaeology that are set out in Appendix A.		
	Historic England	06	<p>Ref: Other relevant strategies and guidance (p.16)</p> <p>Amendment: Include a reference to the Wandsworth Archaeological Priority Area Appraisal (2017)</p> <p>Comment: This document provides information on the borough's APAs.</p>	Agreed	<p>Add additional link to other relevant strategies and guidance</p> <ul style="list-style-type: none"> • Urban Design Study (2021) • Historic Environment SPD • Conservation Area Appraisals • Wandsworth Archaeological Priority Area Appraisal (2017)
	Historic England		<p>Ref: Para 5.8</p> <p>Amendment:</p> <p>Consider switching paras 5.8 and 5.9.</p> <p>Para 5.8 <u>"Consideration of archaeological remains will need to be addressed at an early stage. Where a proposal is identified as having an impact on archaeological remains, it will need to be recorded, and its findings published appropriately and placed on the Greater London Historic Environment Record (GLHER) and the archive deposited with an appropriate repository."</u></p> <p>Comment: It would give clearer emphasis that preservation in situ is the desired outcome if achievable. Additional text notes the need for early consideration of archaeological remains in line with policy.</p>	<p>No change required to paragraph ordering.</p> <p>Amend paragraph 5.8 as suggested.</p>	<p>Consideration of archaeological remains will need to be addressed at an early stage. Where a proposal is identified as having an impact on archaeological remains, it will need to be recorded, and its findings published appropriately and placed on the Greater London Historic Environment Record (GLHER) and the archive deposited with an appropriate repository.</p>
	Historic England	06	<p>Ref: Para 5.9</p> <p>Amendment:</p>	Agreed. Suggest could be separate bullet point under Paragraph 5.9.	<ul style="list-style-type: none"> • Measures for preservation or investigation, recording and

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			<p><i>The display of archaeological sites including appropriate public engagement, both on and off site, during and following completion of the site work.</i></p> <p>Comment: To make clear that S106 might also be used for public engagement.</p>		<p>recovery of archaeological remains and sites; and</p> <ul style="list-style-type: none"> • The display of archaeological sites; and • Appropriate public engagement, both on and off site, during and following completion of the site work.
Clare Graham	Battersea Society Open Space Committee	07	<p>Definitions. The advice given in the tables is helpful. For emphasis, perhaps more should be said in the text about the difference between s106 and CIL and where they are applicable? As the SPD notes, it concentrates on obligations rather than CIL and as a result some of the text needs amendment to explain how certain infrastructure is delivered. For example, para 7.51 highlights the policy requirement to meet the needs of the Playing Pitch Strategy, yet the Table at Appendix 1 states that improvements to sports facilities are not covered through Planning Obligations. So too, boroughwide green infrastructure projects</p>	<p>It is the case that improvements to Council sports facilities are normally funded through CIL, unless this is required to mitigate the impact of a new development or replace an existing facility.</p> <p>There may be circumstances where the Council is looking to secure community use of new facilities being provided through a development. This is referred to in paragraph 7.57.</p> <p>Suggest amendment to Appendix 1 for clarity.</p>	<p>Appendix 1: Improvements to Council sports facilities.</p>
Clare Graham	Battersea Society Open Space Committee	07	<p>Enhancement. The SPD might become an even more helpful document (particularly for Amenity Societies, Voluntary Groups and residents) if it were to set out the mechanisms as to how needs in documents such as the PPS were to be delivered as opposed to being aspirational. Much of the wording is written in the negative, indicating where contributions are required by way of mitigation. For example, it mentions loss of open space, loss of trees, loss of biodiversity at a time when the Council's direction of travel is towards enhancement. Again, perhaps policy needs updating, but couldn't s106 contributions be pushing boundaries further, with a greater emphasis on greening and a requirement for enhancement (some of which will be covered by BNG advice anyway)?</p>	<p>The SPD is intended to provide developers with an overall guide to the obligations that are likely to be sought by the Council in relation to a particular site. It is for other documents and strategies and the Local Plan to consider in more detail how contributions can be directed towards specific projects, as well as the service areas during the planning application process, to reflect the most up-to-date requirements.</p>	<p>No change</p>
Clare Graham	Battersea Society Open	07	<p>Public safety. Under the chapter Achieving High Quality Places and Design Excellence, it is disappointing to see</p>	<p>Local Plan policy LP1 refers to the design-led approach to minimising opportunities for crime and antisocial behaviour, and this is referenced in paragraph 5.11. There may be a need identified for</p>	<p>No change</p>

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	Space Committee		a whole page allocated to the provision of CCTV, including a reference to the requirement for public space surveillance in new developments. This creates the unfortunate impression that the important question of safety and security is not to be addressed at an early stage of the design process and secured during pre-application discussions. The provision of CCTV should be at best, secondary to that approach; it is not, in itself, some sort of benefit. With respect to safety in Open Spaces generally, other measures such as passive surveillance and increasing footfall and movement to and through open spaces should be assessed regularly and addressed where necessary. A greater presence of Parks Police or better, the presence of park rangers or commons keepers is something else that should be considered as part of enhancement schemes.	CCTV in certain circumstances where additional security measures are required, but this does not preclude the need for appropriate design solutions.	
Clare Graham	Battersea Society Open Space Committee	07	Promoting active travel. We would like to see more about strategies (funded through s106?) that might inform new projects. Too often we see s106 contributions being put towards replacement facilities (e.g. new play equipment) rather than enhancements. In particular, we feel that walking and cycling networks should be developed across the whole of Battersea and not just limited to the parts covered by Area Strategies. We believe that connecting open spaces including the Thames and its tributaries would be beneficial to health and well-being. Section 10 on Sustainable Transport is very thin on walking and cycling, which doesn't reflect the Mayor's hierarchy. More direct measures relating to improving the pedestrian and cycle environment based on a properly developed strategy is likely to have greater benefit to residents than a Travel Plan.	Additional wording has been included in section 10 regarding planning obligations to achieve active travel objectives (specifically walking and cycling) (see response to comments from TfL).	See Council's responses to comments from TfL (ID03) including suggested additional text relating to active travel.
Clare Graham	Battersea Society Open Space Committee	07	Pre-planning. The SPD refers to the use of planning conditions as a means of delivering planning contributions. We would encourage the Council to ensure that much of the material in the SPDs is agreed as part of the development of the scheme and not sought after it has been worked up. One example of this would be living roofs, which can have structural and cost implications if not built into a proposal.	SPD encourages early engagement through pre-application process and reiterates this in a number of the individual chapters.	No change
Clare Graham	Battersea Society Open Space Committee	07	New public spaces. We are pleased to see that para 7.54 states that "All major developments will be required to provide new public open space on-site and make improvements to the public realm." However, we	The Council's Parks team is engaged with development of Local Plan policies, and on individual applications where there are likely to be impacts relating to open space arising from a development. This then informs the discussions relating to planning obligations required from a particular development.	No change

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			were surprised to see that it continues: "The Council's Parks team should be engaged at the earliest opportunity to discuss the requirements for open space arising from the development." Surely negotiating the form and provision of public open space should be an integral part of discussions about a planning proposal and not a conversation to be held separately with another Service? Again, perhaps a jointly developed and shared Strategy looking at open space provision and connections between spaces might be beneficial.		
Ajit Gill	Environment Agency	08	Paragraph 6.23 refers to flood alleviation schemes requiring funding, with contributions suggested through the Community Infrastructure Levy (CIL) or planning obligations in the form of commuted sums. However, it is unclear which specific scheme this refers to. The paragraph also references the Wandle Catchment Plan for further guidance. For the most up-to-date information on flood alleviation projects being undertaken by the Environment Agency, we recommend contacting us directly. We note that both the Wandle Catchment Plan and the Thames Catchment Plan have not been updated for several years and are therefore unlikely to reflect the current status of any projects on the River Wandle. We have recently completed a modelling study for the River Wandle. The outputs of this modelling are now starting to be used to develop measures to reduce flood risk across the catchment. This project is on our capital projects programme and entitled: River Wandle Catchment Interventions. There are currently no timescales for delivery and any measures taken forward will be subject to detailed cost benefit analysis and partnership funding such as Community Infrastructure Levy (CIL). Measures that are likely to be investigated include: small-scale river infrastructure modifications, the management of existing flood risk assets, Natural Flood Management, Sustainable Drainage Systems, Property Flood Resilience, improved flood warning, and targeted river maintenance.	Paragraph 6.23 deleted and updated with proposed text to remove outdated references and clarify that developers should consult the Environment Agency for up-to-date information on flood alleviation projects.	Wording changed at paragraph 6.23 to read: 'Flood alleviation schemes may require funding through planning obligations or Community Infrastructure Levy (CIL), particularly where development contributes to increased flood risk or places pressure on existing infrastructure. Developers are encouraged to engage directly with the Environment Agency for the most current information on flood risk projects and priorities. Contributions may support a range of measures including river infrastructure improvements, Natural Flood Management, Sustainable Drainage Systems (SuDS), Property Flood Resilience, and other catchment-wide interventions.'
Ajit Gill	Environment Agency	08	Threshold or trigger for planning obligations We encourage the use of (CIL) charging schedules to secure funding for flood risk alleviation, particularly where such measures are not fully funded through Central or Local Government sources and are critical	The SPD approach aligns with national and local policy and provides flexibility to use CIL and planning obligations appropriately depending on the nature of the development and the flood risk impacts.	No change

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			to supporting development delivery. We acknowledge that planning obligations may be used to mitigate the impacts of development proposals and make them acceptable in planning terms. However, there may be cases where such obligations are not appropriate for addressing flood risk impacts. All proposed developments must assess and address flood risk in accordance with the Wandsworth Local Plan. Where risks cannot be mitigated, such as offsite increases in flood risk we would deem the development inappropriate in accordance with local and national policy.		
Ajit Gill	Environment Agency	08	We note that Table 3 provides a high-level overview of planning obligations required to meet various policy requirements within the Local Plan. However, it is unclear when these obligations are triggered.	Table 3 is intended as a high level guide and therefore it is not possible to have a conclusive trigger for the water section.	No change
Ajit Gill	Environment Agency	08	We wish to reiterate that any increase in flood risk, whether on-site or off-site should be addressed in accordance with Policy LP12 of the Wandsworth Local Plan. Section 6 discusses triggers and thresholds related to water and flooding. We recommend that the SPD offers further clarification on when it is appropriate to use planning obligations to address flood risk. In most cases, flood risk can be managed through appropriate site design and the incorporation of mitigation measures where necessary.	Comment noted	Wording proposed to be added see comment below.
Ajit Gill	Environment Agency	08	Environmental Infrastructure Certain sites may require on-site provision of environmental infrastructure through planning obligations, particularly major developments, which could include flood prevention works. Where new, site-specific developments place additional pressure on the capacity of strategic environmental infrastructure serving the wider area, it would be appropriate to seek contributions. Environmental infrastructure may include flood defences, surface water management, drainage systems, and flood risk mitigation. Funding could be directed toward enhancing the capacity of existing infrastructure, improving and upgrading existing flood defences and delivering new infrastructure. Specific developments adjacent to the Rivers Thames should have a scope to improve flood defences to the standard advocated within the Thames Estuary 2100 Plan. Examples of such measures include river restoration to help manage local flooding and the raising of the existing Thames tidal flood defences to	Agreed.	Add wording as new paragraph after 6.24 ‘Major developments may require on-site environmental infrastructure, including flood prevention measures, secured through planning obligations. Where development increases pressure on wider infrastructure, contributions may also be sought to enhance or upgrade existing systems. This may include flood defences, drainage, and surface water management.

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			ensure properties are better protected in the future. Ensuring that the Community Infrastructure Levy (CIL) and planning obligations are used in a complementary manner to secure infrastructure and community benefits is key to effective implementation.		Developments near the River Thames should consider improvements in line with the Thames Estuary 2100 Plan, such as raising tidal defences or river restoration. Planning obligations and CIL should be used in a complementary way to secure necessary infrastructure.'
Ajit Gill	Environment Agency	08	Biodiversity Regarding paragraph 11.10, we recommend adding additional references to river restoration opportunity datasets. For example, the wording could be amended as below. 'The Council will seek an equivalent financial contribution to off-site projects which will be secured for enhancements which help to deliver the Wandsworth Biodiversity Strategy and forthcoming supporting Wandsworth Biodiversity Action Plan, and other relevant documents, such as the River Wandle Catchment Plan produced by the Wandle Trust, the GIGL River Restoration Opportunity Map, and the Environment Agency's Catchment Planning System.'	Paragraph 11.10 amended to include references to the GIGL River Restoration Opportunity Map, the Environment Agency's Catchment Planning System, and the River Wandle Catchment Plan.	Amend para 11.10 The Council will seek an equivalent financial contribution to off-site projects which will be secured for enhancements which help to deliver the Wandsworth Biodiversity Strategy and forthcoming supporting Wandsworth Biodiversity Action Plan, and other relevant documents, such as the River Wandle Catchment Plan produced by the Wandle Trust, the GIGL River Restoration Opportunity Map, and the Environment Agency's Catchment Planning System.'
Chair	Battersea Society Planning Committee	09	<p>The Battersea Society welcomes the revised SPD on Planning Obligations. The direct links it gives to Local Plan policies and to the S106/CIL obligations which might be applied in relation to different types and scale of development make it much clearer than the 2020 version. This clarity is to be commended.</p> <p>However an opportunity has been lost in the current draft to tie potential support from new development to the objectives of the recently published Growth Strategy for the borough We feel it would be worth refining the draft SPD to reflect more closely the three</p>	The Council's new Growth Strategy has been linked in section 4 relating to the Area Strategies. While the SPD is intended to provide an overview of likely planning obligations that will sought based on the adopted Local Plan, discussions on major applications will take into account the most recent Council strategies.	No change

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			<p>headline objectives in the Growth Strategy of People First, Placemaking and Inclusive Growth.</p> <p>Much of the draft SPD reflects the statutory framework and the London Plan framework. In particular, it provides clear guidelines for support of major infrastructure and service facilities to complement new development and reduce its impact on existing communities. However, as drafted, it lacks bite in relation to the softer issues of community support infrastructure.</p>		
Chair	Battersea Society Planning Committee	09	<p>The London Plan lists community infrastructure as covering health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities and it would be helpful to include this list in the preface to section 7 as the framework for planning obligation support for local communities. To meet the Council's objectives in the Growth Strategy for sustaining sociable communities that maximise well-being and quality of life, planning obligations offer the opportunity to support the subtler elements of placemaking. Relatively small injections of s106 support, which may involve partnership with developers and private and voluntary service providers, can hugely increase a sense of local pride and belonging. The type of facility which this might cover includes libraries, public toilets, benches and sitting areas, community pharmacies and greater access to swimming pools and gyms. This may appear over-detailed but would complement the specific guidance in some other sections, including for example Arts and Culture.</p>	<p>The relevant London Plan policies are referenced in the SPD.</p> <p>Paragraph 7.9 in the SPD refers to the Local Plan list of community infrastructure</p>	No change
Chair	Battersea Society Planning Committee	09	<p>One small drafting point, we presume there should be an entry under Historic Environment in the table in Appendix 1 with a yes at least under planning obligations</p>	Agreed	Table in Appendix 1 to be amended in final version.
Vicky Aston	Sport England	10	<p>Sport England supports the Council's intention to collect contributions towards open space, sport and recreation. Sport England will continue to support the Council with regular updates to the Playing Pitch Strategy and other leisure strategies.</p>	Support noted	No change

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Tim Partington		11	10.17 Explicit reference to cycling infrastructure should be made to meet national planning, TfL and Wandsworth objectives. Examples of works that may be required include: -Introduction or improvement of cycle lanes and junctions made safe for cycling	Noted	See Council's response to comments from TfL (ID03) relating to cycling infrastructure and suggested additional text.
Tim Partington		11	10 A requirement should be added that the building of or upgrading of any highways as a result of a planning approval should meet the Wandsworth Cycling and Walking Strategy of being safe for a year 6 child to cycle without any road danger. Include new paragraph in section 10: Any new roads or road upgrades will be required to ensure they are designed to be used by a child no older than 12 years of age without encountering any danger. This means the introduction of junctions, such as cyclops safe junctions and cycling lanes of a safe width. Safety should be prioritised over road capacity.	Noted Add link in section 10 under Other Relevant Strategies and Guidance https://www.wandsworth.gov.uk/media/12624/wandsworth_walking_and_cycling_strategy.pdf	Wandsworth Walking and Cycling Strategy
Tim Partington		11	5.6 This should also include a requirement to reintroduce historic street surfacing materials, as poor street surfacing like asphalt can ruin the aesthetics of an historic street. The National Trust has done some work on making cobblestones accessible for wheelchairs and bikes, by grinding them down. Under heritage assets: -attention to the aesthetics of road surfaces should be paid, with use of historic and aesthetic road surfaces, while ensuring accessibility for all modes of transport including wheelchair users and cyclists. This may include flattened / ground down cobblestones or brick surfaces.	The Council acknowledge the importance of historic street surfacing materials in contributing to the character of heritage assets. Matters relating to public realm design, including surfacing materials and accessibility, are more appropriately addressed through detailed design guidance or site-specific proposals, where heritage and accessibility considerations can be balanced.	No change