

# **Wandsworth Local Plan**

Statement of Consultation Regulation 18

January 2022

**Appendix 5: Responses to Local Plan Pre-Publication Consultation & Officer Comments**

## Chapter 1: Introduction

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Tim Price				52	General Local Plan Comment	<p><b>General Comment</b></p> <p>Implementation of this Plan will make Wandsworth and awful place to live. I challenge the need to increase the number of people living in Wandsworth.</p> <p>These planners will not be satisfied until all of Wandsworth is high rise housing and everyone has to cycle everywhere. They seem not to realise that you cannot carry a week's shopping on a bike and that people do not really want to travel 10 miles to get to the nearest B&amp;Q. Do they understand that some disabled people who need parking live here too? They seem not to realise that congestion scales with the population density and as you build towards the sky, these people still need to travel on a 2 dimensional grid to get anywhere.</p> <p>Does anybody look at the number of people per m2 in each area of the country and set targets to make this more even? Why not just set limits for each area and say no more housing can be built? Why not set limits on the minimum number of amenities per head of population for example:</p> <p>Petrol stations, DIY stores, Garden Centres, Refuse Centres</p> <p>A solution that removes the Wandsworth dump, HMP Wandsworth, the garden centre near the prison, makes Balham shop fronts stories high and removes the Sainsbury car park, fills the borough with tall buildings and means everyone needs to travel further to visit amenities that they use all the time does not get my support.</p> <p>Further they decrease the desirability of Wandsworth for everyone. I like the non high rise areas of Wandsworth and think for example that the eight storey modern flats that run along Battersea Park detract for that area rather than enhance it. They seem to be mostly empty all the time, why not address this. I am sure you could find 50,000 homes in the borough that are not occupied, there is at least one on our road for example.</p> <p>I cherish the diversity of things you can see when cycling around Wandsworth, and do not want to see this diversity rubbed out and replaced with high density housing mixed with alfresco eating areas, just to meet some artificial Government target.</p> <p>If you are aspiring to be carbon neutral, then building more dwellings and accommodating more people does not seem a sensible plan.</p> <p>I generally agree with the move to support electric vehicles (I currently cycle more miles than I drive each year 6k vs -3k). I think that <u>every</u> child should be brought up in a home with a garden to play in, not just a nearby park. I think that the parks in London should never be built on so do not really agree with the current plans to build sports pitches on Tooting Common.</p>	<p>Comment noted.</p> <p>The Plan aims to maintain Wandsworth borough's special character, connectivity and neighbourhood distinctiveness, and achieved higher levels of growth in a sustainable and environmentally friendly way, bringing benefits and opportunities for all. This informs the policies, area strategies and site allocations of the Plan.</p> <p>Population growth to 377,300 by 2040 is based on Office of National Statistics projections. This population growth reflects an increased birth rate, longer life expectancy and changing migration patterns.</p> <p>The Plan is based on People First, Placemaking and Inclusive Growth. The area strategy approach presented in the Plan focuses on the five areas of Wandsworth Town, Putney, Tooting, Balham and Roehampton. They promote the efficient use of land to deliver co-ordinated development to meet local needs for housing (including affordable housing), employment, services, shopping and open space. This includes a balanced approach to sustainable transport that places a priority on active travel and public transport. This helps to improve air quality and improve public health. A priority of the Plan is to concentrate, where possible, new town centre uses within the borough's centres, ensuring growth and development is located in highly accessible locations and contributes to the revitalisation of the borough's high street, rather than being located out of centre locations as far as possible. The aim in the short to medium term is to fill the existing vacant floorspace, which will provide significant capacity to be able to accommodate the projected increase in retail and food/beverage floorspace needed to support the borough's growing population and which will support the centres' vitality and viability. The Plan wants to ensure that day-to-day facilities are accessible (adopting the 15-minute neighbourhood concept) – Local facilities are within walking distance. Centres will have proximity for its community to access facilities and amenities by active travel reducing the need to commute long distances; particularly for work. Densities support the provision of supply (of facilities and amenities) and demand (by residents and workers). Diverse places that can respond to this need, particularly post the Covid-19 pandemic, are best equipped. Successful places support living, working, supplying, caring, learning and enjoying. Needs are met closer to home.</p> <p>Up to 10% dwellings in residential development needs to provide, or be capable of providing, a parking space for disabled users.</p> <p>The Local Plan can improve lifestyle choices for the residents of the borough: of transport, housing, recreation and work opportunities, with an emphasis on active travel and public transport, creating a more balanced housing stock, increasing open space provision and maintaining a reservoir of industrial land and premises. The strategic approach to supporting town centres across the borough will also contribute significantly to the ambition of maximising choice for the borough's residents.</p> <p>Tall Buildings - In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the height at which buildings will be considered as 'tall' is 5 storeys, and development of 5 storeys and above is likely to be inappropriate. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.</p> <p>Policy LP 55 Protection and Enhancement of Green and Blue infrastructure seeks to protect areas of open space and, where appropriate, enhanced in accordance with opportunities identified in the relevant All London Green Grid Area Framework. New development on or affecting public and private green and blue infrastructure will only be permitted where it does not harm the character, appearance or function of the green or blue infrastructure. Any development which results in a reduction of green or blue infrastructure assets including protected open space will not be supported unless adequate replacement is provided for.</p> <p>The Plan recognises that the range of dwelling sizes available in the existing stock should be maintained, particularly family housing with gardens.</p>	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Pam Davies				102	General Local Plan Comment	Many thanks for making this draft available. I found the plan clear and helpful - including the signage to other sources of information where applicable. I have no adverse comments make. Regards. Pam Davies	Support noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Miriam Howitt				108	General Local Plan Comment	I have read the Draft Local Plan and find the principles, aims and considerations are sound in general.	Support noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Laura Hutson	Sport England			269	General Local Plan Comment	<p>Thank you for consulting Sport England on the above named document. Please find herein our formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">http://www.sportengland.org/facilities-planning/planning-for-sport/</a></p>	Comment noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			276	General Local Plan Comment	<p>There are lots of things throughout this plan that the council would like to happen. Many of these are outside the scope of the planning system. Some things can be asked of developers if a clear need is set out in the plan, which needs very clear wording without 'get out' phrasing. A lot of the rest need <u>action and funding from other council departments</u> if they are to be realised.</p> <p>As general matter of navigation please include the maps in the index.</p> <p>Once the plan is adopted free standing high resolution versions of these maps should be made available on the Council website, linked from the plan.</p>	Comment noted. The Local Plan sets out a range of requirements that are delivered through a diverse range of means. Chapter 22 - Implementation, Delivery and Monitoring provides an overview. The presentation of the Adopted Plan will be considered at its publication. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Mr Robert Mansell				277	General Local Plan Comment	The proposal for the <b>Nine Elms to Pimlico pedestrian bridge</b> across the Thames is sited too near to the Nine Elms Pier so that it would interfere with far too many local residents. A much better siting for the southern end of the bridge would be a little further to the west (the other side of Cringle Dock) - this would not be annoying to any local residents of the pier houseboats and would be much greater benefit to the large number of potential residents of Battersea Power Station developments, its park and the TFL clipper dock there.	The Local Plan supports the provision of the bridge. However, it is not specific with regard to a detailed landing points. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Chris Brodie				446	General Local Plan Comment	The Area Strategies and placemaking objectives are encouraging, particularly where there is an urban design input showing important connections. So too is the reference to the 15 minute neighbourhood. However, this a boroughwide plan and a greater explanation is needed about how detailed strategies will be developed at a local level, especially in those areas where there is less development. This is the first public iteration of the local plan. As the plan making process evolves ,there should be more consistency in policies in the plan and in the application of its policies to achieve objectives. Some of the Evidence Base was produced before the impact of the covid pandemic took effect and clearly this impact will continue for some time to come. There will be a need to re-visit some of the studies and policies as patterns over the past year evolve, e.g. more walking and greater use of open spaces; greater use of essential local shops and services; a higher priority to health and wellbeing in policy making etc.	Comment noted. The Plan will be monitored through the AMR and Sustainability Appraisal indicators. This will allow identification of any issues arising from the implementation of the Plan. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator			442	General Local Plan Comment	Overall the references throughout to climate change mitigation, biodiversity improvement and sustainable development and practices are welcome, but sadly many of the ambitions outlined in the Strategic Vision and Objectives are	Comment noted. The Local Plan provides a broad policy framework to address climate change. This is particularly focused through Chapter 15 - Tackling Climate Change. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Wandsworth Green Party					not followed through in the policies themselves and we find that overall, the plan falls short of achieving the climate change mitigation provisions Wandsworth so desperately needs. This is a lost opportunity for a Council that has declared a Climate Emergency. More detailed comments on key areas follow.		
Mr Robert Arguile	Chair The Putney Society			623	General Local Plan Comment	<p>The Putney Society, as the amenity society for Putney and Roehampton, recognises the importance of a robust yet flexible Local Plan in shaping development and the Council's actions to meet local objectives. As such we have considered the draft Local Plan in some detail across all of the Society's Panels and hope the comments attached will help you in formulating a truly effective and enforceable plan, balancing development with the needs of the established local communities and meeting environmental targets.</p> <p>There are lots of things throughout this plan that the council would like to happen. Many of these are outside the scope of the planning system. Some things can be asked of developers if a clear need is set out in the plan, which needs very clear wording without 'get out' phrasing.</p> <p>A lot of the rest <u>need action and funding from other council departments</u> if they are to be realised. Including these in a Local Plan and hoping for the best is not enough.</p> <p><b>The Society's comments have all been entered online by paragraph into the Consultation database.</b> However, because many strands of the plan overlap, we have also collected them into this document by themes rather than in the same order as the draft plan.</p> <p><b>Section 1</b> covers generic and borough wide policies. Chapters 2, 3, 14, 15, 16, 18, 20, 21.</p> <p><b>Section 2</b> covers area specific parts of the plan which relate to Putney or Roehampton. As the amenity society for Putney and Roehampton we have only commented on these areas and hope that other amenity societies have responded for their parts of the Borough. Chapters 7, 9, 11, 19</p> <p><b>Section 3</b> separates policies on housing, which is the dominant form of development. Chapters 2, 14, 15 &amp; 17</p> <p>Our comments on individual chapters or policies should also be taken referring to other parts of the plan which may have bearing on the same topic.</p> <p>The Putney Society</p> <p>February 2021.</p>	Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Clare Graham	Chair of Open Spaces Committee Battersea Society			491	General Local Plan Comment	<p>General points:</p> <ul style="list-style-type: none"> <li>The benefits of open space should lie at the heart of a planning strategy that is concerned about the environment, climate change and people's health and wellbeing.</li> <li>The planning process needs to embrace both the protection and improvement of existing open spaces, and the delivery of new ones.</li> <li>This requires an over-arching vision, and also specific strategies for its achievement.</li> <li>Clearly-stated policies will guide developers and help achieve successful outcomes in this respect.</li> <li>We are concerned that at present too many policies have been worded in a way that doesn't either offer accountability or guarantee delivery, saying that certain initiatives would be supported when they should be required.</li> <li>There is also a lack of specific measures and targets; we have made some suggestions for these.</li> </ul>	Comment noted. Chapter 21 - Green and Blue Infrastructure and the Natural Environment provides a policy framework for the protection, improvement and provision of open space. Chapter 22 - Implementation, Delivery and Monitoring outlines the implementation of the Plan. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>Clearer and more detailed maps are also sometimes required.</li> </ul> <p>Where appropriate it will also be helpful to indicate funding sources; the cost of infrastructure should be factored into proposals from the outset.</p>		
Mr David Patterson	Agent Tooting Liberal Democrats			678	General Local Plan Comment	<p>First let us look at the projected population figures which show a continuing increase from a current figure of 329,700 to 377,300 in 2040. This shows an endless development with no end in sight. There will be a tipping point when this continued population increase in the borough will have to stop but there is no suggestion in these figures that it will occur in the period covered. Planning for the future is difficult because of changes that can take place so rapidly. One of the features of modern life is that changes come about quicker and from unsuspected directions. Some are already here such as the diminishment of the importance of town shopping centres with shop closures as a result of shopping online. This is because people can consider a far wider range of goods online than they can see in a shopping centre. Some goods and services will be immune from this but already many retail shops have succumbed. Likewise we could see many alterations to transport. This is not only because shopping centres will have less pull but also the notion of personal cars may well fade in the future with autonomous vehicles being more convenient and reliable. This could mean less road space devoted to parked vehicles. More people working from home at least for part of the time could affect the demand for transport – particularly public transport. With short local journeys these should be made on foot or by bicycle where possible. This is especially so while petrol or diesel cars are being used. For petrol cars the effect of catalytic converters does not kick in right away.</p>	Comments noted. Population projections are established through the ONS. The Local Plan establishes a policy framework to guide change over the plan period. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Mr David Wilson	Senior Town Planner Thames Water			746	General Local Plan Comment	<p><b>Growth Options</b></p> <p>The information contained within the new Local Plan will be of significant value to Thames Water</p> <p>as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>While the consultation document gives some indicators where development may be possible it</p> <p>doesn't give any indication as to specific sites, phasing and what scale of development and so it</p> <p>is difficult for us to review the infrastructure requirements other than to say:</p> <ul style="list-style-type: none"> <li>Development location, type, scale and phasing are important if Thames Water are to effectively plan and deliver infrastructure in line with development</li> <li>The time to deliver infrastructure should not be underestimated it can take 18 months to 3 years to understand plan and deliver local upgrades 3 – 5 years for more strategic solutions.</li> <li>Developer should be encouraged to engage with TW at the earliest opportunity to discuss infrastructure needs</li> <li>We offer a free pre application service to encourage developers to do this &gt;&gt;&gt;&gt;&gt;&gt; Link <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></li> </ul> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian</p>	The Council's HELAA, AMR and IDP should assist in the development of Thames Water's infrastructure planning. It is not considered necessary to add this amount of detail to the Site Allocations for the purpose of plan making and the information can be sought elsewhere.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>condition is attached to any planning permission to resolve any infrastructure issues.</p> <p>We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.</p>		
Monica Tross	Secretary to planning committee  Battersea Society			747	General Local Plan Comment	<p><b>FOREWORD</b></p> <p>The Battersea Society has considered the consultation in detail and hope that the supportive comments and constructive challenges that follow will help colleagues at Wandsworth Council in their next stage of consideration of the Local Plan. We share the Council's desire for a well thought through plan that continues to ensure that Battersea, and more broadly Wandsworth, continues to be a thriving borough and a great place to both live and work. We are happy to continue to work with the Council as the plan develops over the next few months. We are drawing our members' attention to this Local Plan consultation and will continue to keep them informed as it is finalised. If anything is unclear from our response we would be happy to discuss this.</p> <p><b>STRUCTURE AND STRATEGIC CONTEXT</b></p> <p><b>Introduction</b></p> <p>Our core concern is that the Plan as currently drafted is poorly structured, inconsistent and incoherent, and does not represent a proper basis on which to determine policies and strategies for the next fifteen years. Significant changes will be required before it can meet the requirement of the National Planning Policy Framework (NPPF) that it should contain policies that are clearly written and unambiguous, demonstrate how they address relevant economic, social and environmental objectives, and avoid unnecessary duplication of policies.</p> <p>The future vision for Wandsworth must be a key concept of the Plan and this vision for Wandsworth appears to be missing. In thinking about the future, surely the vision must be about the future of our great-grandchildren and what we leave behind for them, considering scientists' warnings about the way that natural resources are being used up and the effects of this on climate change. The Council should take this opportunity to make this the Wandsworth vision and focus policies around this. We recognise that there were significant changes in the policy environment created by the Government's White Paper Planning for the Future introduced while the plan was being written including:</p> <ul style="list-style-type: none"> <li>• Extensions to permitted development rights (PDR) including the right to add two storeys to existing blocks of flats, and to demolish offices to change them into housing.</li> <li>• Changes to the Use Classes Order (UCO) which now brings together most retail and commercial uses under a new single Class E.</li> <li>• Proposed changes to housing targets.</li> </ul> <p>There have been further changes in national policies and further proposals since the plan was presented to Committee last November:</p> <ul style="list-style-type: none"> <li>• Further changes to housing targets. These will have to be reflected in the next Local Plan.</li> <li>• Changes to the London Plan (now published) which remove the protection for industrial land, and set a minimum threshold of six metres for tall buildings.</li> <li>• Proposals to allow any Class E property to be converted to residential use without the need for planning consent and also to reduce the time for consultation on some infrastructure projects.</li> </ul>	<p>The plan has a clear structure and is easy to navigate and considered to meet the requirements of the NPPF. The vision and objectives are presented in Chapter 2 - Strategic Context, Vision and Objectives. The Plan sets the influence of the broader public policy framework and focuses this through a Placemaking, People First and Inclusive Growth lens. Policy for the Area Strategies (PM2 - PM10) respond directly to this.</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>Proposed changes to the NPPF and the publication of a new National Model Design Code.</li> </ul> <p>Other policy changes include a requirement in the Greater London Authority's draft Good Quality Homes for All Londoners Supplementary Planning Guidance (SPG) to produce design codes for all significant housing developments. More generally, the Plan does not mention the post-Covid London Recovery Programme being developed and implemented by the GLA, or similar initiatives being developed by the Government at national level.</p> <p>These policy changes would have justified some delay in publishing. . What is now being consulted on will have to be changed significantly although uncertainties and practical difficulties for officers and others will not have changed. This is concerning because if significant amendments are made before submission of the Regulation 19 document, this is the last chance for local groups and interests to comment on its form and content.</p> <p>The New Plan</p> <p>The Plan reads as three separate parts – Strategic Context; Spatial Strategy and Area Strategies; and policies on urban design, housing, transport, green and blue infrastructure and so on – largely unrelated to each other.</p> <p>It is difficult to see how, if at all, the various strategies, objectives, goals and targets set out in Sections 2.35-2.55 – among others, for example, relating to environment and sustainability, transport, or health and well-being –relate to the overall goals and the environmental, social and economic objectives identified under the "Spatial Vision". Nor is it clear how those goals and objectives relate to the more specific themes and principles identified for Placemaking, Smart Growth, and People First; or to the individual Area Strategies; or to the 62 policies set out in the rest of the Plan.</p> <p>Instances of this lack of coherence and consistency include:</p> <ul style="list-style-type: none"> <li>The overlap set out in Sections 2.31-2.34 between the five overarching objectives set by the Council for Smart Growth as part of a recovery plan in response to the Covid-19 pandemic and its long-term vision on the one hand, and the strategic objectives set in the Council's Corporate Plan on the other.</li> <li>The Corporate Plan specifies, "more homes and more choice". This is not mentioned in the Smart Growth objectives, while the latter include an aspiration that Wandsworth should be the greenest inner London borough, not mentioned in the former.</li> </ul> <p>Placemaking - built on a three-part "framework" of Placemaking, Smart Growth and People First – is, we are told, at the heart of the Plan. Under the Placemaking head, the fourteen "principles or characteristics are identified, including identity and heritage; urban design; nature and biodiversity; work and opportunity; mixed use; active travel; and health and well-being". But there is no attempt to relate these principles and themes either to the Corporate or to the Smart Growth objectives. Moreover the policies set out in the Area Strategies make no attempt to refer to the fourteen principles.</p>		
Cllr Peter Dawson	Northcote Ward Councillor			675	General Local Plan Comment	A final, unrelated point, is that, notwithstanding the commentary at paragraph 2.7 of the Policy Map Changes document, I do not support the proposal to remove the designation of Northcote Road as an Area of Special Shopping Character (Policy DMTS 10) and would request it is reinstated.	The Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area designates Northcote Road for specialist retail and evening economy. This is supported by Map 19.1 and policies LP44, LP45, LP47 and LP49. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Josephine Vos	Transport for London			676	General Local Plan Comment	Dear Sir/Madam, Consultation on the first draft of the Wandsworth Local Plan  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	Comments noted. References to car-free developments have been removed from all site allocations as developments within these locations will be expected to comply with Local Plan policy. PTAL has not been included with each site as it is readily available information.	LP53 Parking, Servicing and Car Free Development has been updated to be in line with the London Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.</p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on the pre-publication version of the Wandsworth Local Plan.</p> <p>The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Publication London Plan and its evidence base are now material considerations and have significant weight. Publication of the final version of the new London Plan is anticipated in March 2021, at which point it will form part of Wandsworth's Development Plan and contain the most up-to-date policies.</p> <p>Local Plan policies should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.</p> <p>In this context we welcome application of Placemaking, Smart Growth and People First principles in developing the Area Strategies, in particular, the need to manage traffic and provide good public transport connectivity, support active travel and work towards the 15-minute neighbourhood. However, the Plan should include policies and measures to ensure that all development contributes towards achieving the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan as well as the Vision Zero road safety objective.</p> <p>Some of the principles are not reflected consistently in individual site allocations. Only a few sites are identified as suitable for car free development, yet the London Plan requires all development in the Opportunity Areas covering Nine Elms and Clapham Junction as well as all areas of PTAL 4 –6 in inner London to be car free. A more consistent approach should be taken for all sites where car free development applies. It would be helpful to provide the PTAL for each site allocation.</p> <p>We welcome the strong emphasis on applying the Healthy Streets Approach and the positive approach to encouraging active travel. We also welcome strong policies on safeguarding and retaining transport land including specific sites and support for improved bus services and infrastructure including waiting facilities and stands.</p> <p>Our comments on specific modifications and suggestions for amendments or wording improvements are detailed in appendix A below.</p>		
Cllr Loveland	Labour Group			631	General Local Plan Comment	<p>We embrace the objectives and ambition of the Pre-publication Wandsworth Local Plan (WLP/the Plan) and the spatial strategy that it sets out. We recognise that the newly published London Plan provides an up-to-date London wide policy framework that will strengthen and underpin many of the policies in our own WLP. However, we also recognise that the Plan is being prepared at a time of considerably uncertainty. In part this uncertainty is a consequence of possible changes to the planning system set out in Planning for the Future and in changes (that have been made and are being considered) in relation to permitted development land use. Equally, the longer term economic and social impacts of the Covid 19 pandemic and what this might mean for the growth assumptions that are made by the Plan are not knowable, although it</p>	Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						is highly likely that the acceleration of the move to online retail shopping will have an impact on district and local centres. Whatever the case it is likely that emerging planning policy will need to be applied in a creative way that – essentially - does not compromise the Plans objectives.		
Susie Morrow	Chair Wandsworth Living Streets			661	General Local Plan Comment	<p>Key performance indicators</p> <p>The key to determining success is by setting out clear, concise and measurable objectives at the outset that can then be unambiguously assessed following implementation.</p> <p>We would therefore like to see tangible and realistic metrics and key performance indicators (“KPIs”) applied to the key planning policies, and measures that support broader WBC objectives.</p> <p>For example, we know that air quality is the direct consequence of a variety of activities including domestic energy and private car use. We therefore expect to see specific targets to enable a shift in behaviours, e.g. reduced car use/ownership by better targeted CPZ permit pricing structures.</p> <p>Healthy Streets metrics – we would like the Healthy Streets Check for Designers used (and to see the Healthy Streets Index) for all new developments, and would like WBC to adopt a policy that any development or change to the streetscape leads to a measurable and tangible improvement in the Healthy Streets Index, both for the scheme itself and surrounding streets and places.</p> <p>WESS - to support the WESS, we would like to see statistics and KPIs for emissions produced for new developments, and improvements and repairs to the public realm so that stakeholders can understand the environmental impact of construction of new buildings and repair of carriageways for example on our local, national and global climate.</p> <p>Land use - we would also like to see annual data produced on land use across the Borough, including residential, office, industrial, public transport, roads (split between ‘free’ carriageway and parking spaces), pavement space, open spaces and water courses. Only through understanding land use in the Borough, can we determine when the Local Plan is leading to tangible overall improvements in our places and streets.</p>	<p>Monitoring indicators will be developed across the Local Plan policy framework supplemented by indicators against the Sustainability Appraisal. These will be published at Regulation 19 stage.</p> <p>The Authority Monitoring Reports (AMRs) will allow the implementation of the Local Plan to be monitored.</p>	No changes to the Local Plan are considered necessary
Susie Morrow	Chair Wandsworth Living Streets			653	General Local Plan Comment	<p>Wandsworth Living Streets Response to the draft Local Plan</p> <p>We very much welcome the emphasis on Place Performance and Place Making, the adoption of the Sustainable Transport Hierarchy, continuous reference to the Wandsworth Environment &amp; Sustainability Strategy (“WESS”) throughout the dLP.</p> <p>We note the Local Plan is the document that sets out the vision for the all of Wandsworth’s public and private spaces over the next couple of decades. We also note that Wandsworth Borough Council must adhere to both London and UK planning policies, and there are therefore statutory constraints within which the dLP must be developed.</p> <p>We appreciate the dLP is by necessity a very long and detailed document, and therefore our response is set around 5 key themes which we hope are reflected in the next iteration of the dLP, noting that the Local Plan is the pre-eminent document that will determine how all our spaces and places will be enhanced from 2023-2038:</p> <ol style="list-style-type: none"> <li>1.World-class design</li> <li>2.Legacy streetscape</li> </ol>	Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>3.Technology &amp; data</p> <p>4.Key performance indicators</p> <p>5.Consultations</p>		
<b>Tony Burton</b>	Wandle Valley Forum			1738	General Local Plan Comment	<p>1. Wandle Valley Forum provides support and an independent voice for over 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. Many of our supporters are based in Wandsworth.</p> <p>2. Wandsworth takes its very name from the Wandle and includes an important part of the Wandle Valley Regional Park and a significant length of the River Wandle, including its mouth in the Wandle Delta. The Wandle Valley is a major strategic environmental and heritage asset for the Borough and the site of major industrial estates and much employment. The network of Wandle-related open spaces and the Wandle Trail are especially important for the quality of life in Wandsworth and provide an economic opportunity drawing on the area's environmental quality. It also provides the means to connect important areas of the Borough, including Wandsworth Town Centre and the Thames, and to support active travel and mental wellbeing</p> <p>3. We have established our priorities for the Wandle Valley in the Wandle Valley Forum Charter. This is grounded in the views of community groups, voluntary organisations and local businesses that support us. It sets out a number of issues to be addressed through development plans in the Wandle Valley, including Wandsworth's Local Plan.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
	Highways England			845	General Local Plan Comment	<p>Thank you for your email of 4 January 2021 inviting Highways England to comment on the above consultation and indicating that a response was required by 1 March 2021. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN) that Highways England is responsible for. The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in particular the A3. Having examined the consultation documents and noting the distance of the area from the A3 (SRN) that Highways England are responsible for, we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para's 9 &amp; 10 and MHCLG NPPF para 109). Accordingly, Highways England does not offer any comments on the consultation at this time. Thank you again for consulting with Highways England. We look forward to future consultation via our inbox PlanningSE@highwaysengland.co.uk.</p>	Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Mr Chris Brodie				978	General Local Plan Comment	<p>The Area Strategies and placemaking objectives are encouraging, particularly where there is an urban design input showing important connections. So too is the reference to the 15 minute neighbourhood. However, this a boroughwide plan and a greater explanation is needed about how detailed strategies will be developed at a local level, especially in those areas where there is less development. This is the first public iteration of the local plan. As the plan making process evolves, there should be more consistency in policies in the plan and in the application of its policies to achieve objectives. Some of the Evidence Base was produced before the impact of the covid pandemic took effect and clearly this impact will continue for some time to come. There will be a need to re-visit some of the studies and policies as patterns over the past year evolve, e.g. more walking and greater use of open spaces; greater use of essential local shops and services; a higher priority to health and wellbeing in policy making etc.</p>	The Local Plan provides a comprehensive policy framework to guide development across the borough. The Plan is resilient and robust. It takes a flexible approach to allow responses to post-Covid outcomes. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Katie Parsons	Historic Environment Planning Adviser			868	General Local Plan Comment	Dear Christine,	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the revised policy also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building	Policy LP4 amended to reflect the requirements set out in the London Plan. Heritage consideration criteria added to a number of Site Allocations.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Historic England					<p><b>Re: Pre-Publication Draft Local Plan (Regulation 18) Consultation</b></p> <p>Thank you for notification of your draft Regulation 18 Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on the draft document. I have provided a summary of our advice below and more detailed comments in Appendix 1. These comments have been formed in line with the NPPF (2019) and with reference to draft emerging London Plan which will become part of the Borough's development plan when adopted (planned for 2<sup>nd</sup> March 2021).</p> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>• A lot of good work has been done to develop a positive strategy for the historic environment. However, this good work is undermined by the spatial, place-based elements of the plan.</li> <li>• There are concerns regarding the location of tall buildings and the evidence to support these. At present it is not clear where exactly they can go.</li> <li>• The locations appropriate for tall buildings need to be refined and maximum height parameters need to be set (see London Plan 3.9.2). The appropriateness of allocation capacities and associated development/design principles will be dependent on this. We also need to know this to determine whether further heritage assessments would be required at plan stage.</li> <li>• The plan does not explore alternative options to tall buildings when it comes to delivering high-density development.</li> <li>• The Urban Design Study makes detailed recommendations which have not been transposed into the plan policies. We recommended that the plan is amended to align more fully with the evidence. In places, the plan proposals conflict with the Urban Design Study findings. More precise design guidance is required to support allocations to protect heritage.</li> </ul> <ul style="list-style-type: none"> <li>• Buildings must be expressed in metres above ground level and AOD. It is unhelpful to express heights in numbers of storeys.</li> <li>• It would be helpful to identify which site allocations have been carried over from the adopted plan and to provide an update on their status.</li> </ul> <p>The draft plan, in its present form, is unjustified and we do not consider that it will be deliverable, effective or consistent with the London Plan and NPPF policies, or with the statutory obligations set in national legislation. We do not consider the plan to be sound at this stage.</p> <p>In preparation of the next draft, we encourage you to draw on the knowledge of local conservation officers, the Greater London Archaeological Advisory Service, and local heritage groups.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	<p>heights for each zone. The revised policy is considered to be in conformity with the London Plan.</p> <p>The mid-rise and tall building zones have been identified through a detailed analysis which is set out in the Urban Design Study. The identified zones seek to strike a careful balance between protecting the historic environment and allocating sufficient capacity to meet and exceed the housing requirement. It is considered unrealistic to rely entirely on alternative options to tall buildings when it comes to delivering high-density development, and hence resources were directed to exploring more realistic options for accommodating growth. However, a 'tall building zone' designation does not preclude other forms of development. Locations identified as tall building zones can also accommodate high density mid-rise or mansion-block style development rather than only standalone high-rise towers. This is clearly articulated in the supporting text of Policy LP4.</p> <p>It is unclear which recommendations set out in the Urban Design Study have not been transposed into the plan policies. The recommendations set out in the Urban Design Study were incorporated in the Local Plan where possible. It is anticipated that the findings of the Urban Design Study will also be used to develop design codes (as advocated by the NPPF and London Plan) for some parts of the borough to provide clear design guidance for development in those areas.</p> <p>The 'Design Requirements' were reviewed for each Site Allocation. Where appropriate additional heritage guidance was added. The importance of protecting heritage assets or character of specific areas is also embedded in the identified appropriate heights and tall building zone designations.</p> <p>Heights are not expressed in AOD as the ground level of the tall and mid-rise building zone differs across each individual zone. Therefore, the appropriate heights defined would vary if expressed in AOD for every individual location. Heights in AOD have been considered in the development of the appropriate building heights in the Urban Design Study (for example, prominent plots on the tops of hills may have a lower height restriction than those at a lower AOD, depending on the site specific context).</p> <p>Appendix 2 of the Local Plan shows an appropriate height range for each tall building zone in storeys and metres above ground level. The supporting text of policy LP4 makes it clear that the heights expressed in all parts of the policy assume an average storey height of three metres. Proposals for commercial premises should be consistent with the parameters set by the height in metres for the identified number of residential storeys. Applications for tall buildings will be required to express the height of buildings in storeys and metres.</p> <p>The 'Policies Map Changes Document' shows which site allocations have been carried over from the adopted plan.</p> <p>Please note that other issues raised in the representation from Historic England are addressed in other responses. Overall, it is considered that the changes made address the issue of soundness of the Local Plan.</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						I hope that these comments will be helpful. I am happy to comment on any evidence documents or assessment methodologies before the next version of the plan is published.		
	Wandsworth Cycling (London Cycling Campaign)			953	General Local Plan Comment	<p><b>Feedback from Wandsworth Cycling for the Draft Local Plan Consultation</b></p> <p>We are writing to provide our feedback on the Draft Local Plan (version November 2020) as part of the consultation. The draft document is meticulously researched, extremely comprehensive, and presents a laudable and ambitious vision for the future of Wandsworth. We are excited to play our part in realisation of this vision.</p> <p>We very much appreciate the opportunity to provide feedback, and would be delighted to discuss further, clarify, or expand on any of our comments (refer to the attached PDF) at any point.</p>	Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Susie Morrow	Chair Wandsworth Living Streets			666	General Local Plan Comment	Sections 14-21 are chapters re: policy and therefore should be moved ahead of sections 4-13. Stakeholders would likely need to understand the policies before they then understand how they apply to specific areas in the Borough / Spatial Strategies	The structure of the Local Plan is straight forward and easy to navigate.	No changes to the Local Plan are considered necessary
Ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			999	General Local Plan Comment	<p>As the Neighbourhood Forum for Tooting Bec and Broadway (henceforth 'the Forum'), our response relates to issues, both strategic and neighbourhood-level, affecting the use and development of land within the neighbourhood plan boundary. We have divided our response into two parts- the first is on strategic matters in the Draft Local Plan (henceforth 'the Plan') that affect or have the potential to affect the Tooting Bec and Broadway area, and the second is on the detailed proposals for Tooting, both within the Plan and the Tooting Area Strategy. We look forward to having our comments taken into account in the next iteration of the emerging Local Plan.</p> <p>1. Strategic matters in the draft Local Plan While there are many elements of the draft Plan that we support in principle, a headline summary of what we are most concerned by is as follows: • Wandsworth's apparent lack of joined-up planning and policy for practical actions to combat climate change, despite its Climate Emergency Declaration; • Wandsworth's reluctance to actively collaborate with the Neighbourhood Forum, despite our knowledge and expertise of Tooting, and its statutory duty to advise and assist us; • The draft Plan's minimal recognition of Tooting's unique ethnic mix and cultural heritage, some of the most important aspects to understand in meaningful placemaking; • Green infrastructure policy that is generic and insufficiently place-specific, does not cross-reference to climate change objectives, and is underpinned by evidence not currently available for scrutiny; and</p> <p>2 • The Council's ongoing reluctance, despite the declared climate emergency, to tackle the negative effects of cars and traffic in Tooting, including carbon emissions, congestion and danger to pedestrians.</p>	Comment noted. Chapter 15 - Tackling Climate Change provides a policy framework to mitigate the impacts of climate change. A broad range of stakeholders have been engaged in preparing the Local Plan. The Area Strategy for Tooting recognises the heritage of the area. Chapter 21 - Green and Blue Infrastructure and the Natural Environment combined with the Area Strategies provides a place-specific policy framework around green infrastructure provision. Chapter 20 - Sustainable Transport sets out a balanced policy framework for the borough. No changes to the Local Plan are considered necessary	No changes to the Local Plan are considered necessary
Hassan Ahmed	GLA			1094	General Local Plan Comment	<p><b>Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended);</b></p> <p><b>Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012</b></p> <p><b>RE: Draft Local Plan: Pre-Publication Regulation 18 Consultation Version, November 2020</b></p> <p>Thank you for consulting the Mayor of London on the Wandsworth Draft Local Plan: Prepublication Regulation 18 Consultation Version.</p> <p>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</p>	Comment noted. Policy SS1 has now been revised to account for comments raised.	Policy SS1 has now been revised to account for comments raised.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.</p> <p>The Mayor provided comments on the earlier Wandsworth Local Plan Full Review Issues Document 2018 on 6 February 2019 (Ref:LDF32/LDD09/CG01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is consistent with the Publication London Plan (PLP).</p> <p><b>The London Plan</b></p> <p>The Mayor first published his draft new London Plan for consultation on 1st December 2017.</p> <p>Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Secretary of State wrote to the Mayor on 29 January 2021 advising him that he can now publish his plan and as such the Publication London Plan and its evidence base are now material considerations and have significant weight. The new London Plan will be formally published on the 2 March 2021, at which point it will form part of Wandsworth's Development Plan and contain the most up-to-date policies.</p> <p><b>General</b></p> <p>The borough's vision and objectives are set out clearly early on, and this is welcomed by the Mayor. The draft plan establishes 14 principles underpinning the borough's placemaking ambitions. These guiding principles are applied within place approaches comprised of Placemaking, Smart Growth and People First elements and each follows through into the area strategies later on.</p> <p>The draft Plan divides the borough into character areas, each with their own area specific strategy, including Wandsworth Town, Nine Elms, Putney and Tooting to name a few. Each of these strategies responds to the unique characteristics, context and growth aspirations of each of these sub-areas. The overall approach is one which is aligned with the Mayor's Good Growth objectives and is welcomed.</p> <p>It would be clearer if the draft Plan set out early on, perhaps within Policy SS1, its ambitions for growth over the plan period for housing, industry, office and other forms of development, so that they are contained in one place. The plan period should also be made clearer, and possibly included in draft Policy SS1. Early on the plan suggests that it covers the period from 2023 until 2038. However, much of the Local Plan evidence only takes us up to 2034.</p> <p>Site allocations are set out clearly in maps but could benefit from the inclusion of more information on the ability of the sites to accommodate growth, thereby providing a benchmark for future development proposals.</p> <p>The Mayor notes Wandsworth's good record of housing delivery over the last five years and will endeavour to continue to support this in line with his objectives for Good Growth.</p> <p>The draft Plan would benefit from the identification of specific sites and areas that are able to accommodate the borough's future needs for industrial uses and waste management.</p> <p>As currently drafted, however, there are a number of concerns which left unattended could constitute potential issues of non-conformity with the PLP.</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>This includes the borough's proposed approaches to affordable housing, waste and tall buildings. Each of these is discussed in greater detail later on.</p> <p>The Mayor is happy to continue working with Wandsworth to provide support on how the approach in the Local Plan might be improved and further evidenced, in order to support the strategic spatial approach, set out in the Publication London Plan and to deliver Good Growth in the borough.</p> <p>Next steps</p> <p>GLA officers continue to offer their support in order to resolve the issues identified in this letter and to provide guidance.</p> <p>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 PLP 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 Hassan Ahmed on 020 7983 4000 or at hassan.ahmed@london.gov.uk</p>		
Caroline Marston	Marston Properties	Mr Paul Watson	Phillips Planning	849	General Local Plan Comment	<p><b>See attachment for context</b></p> <p>Introduction</p> <ol style="list-style-type: none"> <li>1. Marston Properties Limited (MPL), are the freehold owners of Nos.17 &amp; 27 Lydden Road. MPL has engaged with the Council through the local plan review evidence gathering stage and in particular provided input into the Employment Land &amp; Premises Study undertaken by AECOM on the Council's behalf.</li> <li>2. As a property owner within the Lydden Road 'Locally Significant Industrial Area' (LSIA) MPL was encouraged by early suggestions that the Council may be looking to support a comprehensive redevelopment of this area at higher density with the aim of greatly enhancing its appearance and the way it relates to the surrounding uses.</li> <li>3. Following discussion with Council and AECOM representatives in December 2019 and January 2020 there had been some expectation that the review plan may seek to provide greater flexibility in terms of the range uses which could be considered acceptable within the Lydden Road LSIA (in addition of course to the retention of existing industrial floorspace), in an effort to encourage and assist the viability of comprehensive redevelopment and so securing environmental enhancement of the area.</li> <li>4. Unfortunately, whilst some helpful elements such as support for multi-storey redevelopment schemes within the LSIA are set out in the pre-publication draft of the plan, the draft precludes any new residential use and most concerningly even seeks to prevent office use, save that which is ancillary to the industrial uses.</li> <li>5. As may be appreciated there is limited scope for multi-storey industrial development. This is difficult practically and also from a viability perspective. Concern is therefore raised regarding the lack of support for mixed use which could provide a catalyst for high quality redevelopment, retaining at least the same quantum of industrial space at lower levels, with other potentially higher value uses above. Without this potential there seems little prospect that sites will come forward to deliver the environmental enhancements that are considered important in the Wandle Valley area.</li> </ol>	Comments noted. See response to comment number 854, which addresses this issue more fully.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>6. Our comments therefore focus primarily on the following draft policies and the supporting and explanatory text around them:</p> <ul style="list-style-type: none"> <li>- PM10 Wandle Valley;</li> <li>- LP36 Promoting &amp; Protecting Offices; and</li> <li>- LP37 Managing Land for Industry &amp; Distribution</li> </ul> <p>Context &amp; Discussion</p> <p>General Approach &amp; Strategy for the Wandle Valley:</p>		
Tony Hambro	St George's Sq. Residents' Association			1078	General Local Plan Comment	<p>On behalf of the St George's Square Residents' Association, I object to the inclusion in this draft plan of any reference to an intention to revive the idea of a new bridge from Nine Elms to Pimlico.</p> <p>My comments refer (a) to the consultation process, (b) to the plan in general and (c) reasons for opposing the Bridge, as mentioned in the individual paragraphs/pages listed below.</p> <p>(a) The consultation process is flawed because:</p> <ul style="list-style-type: none"> <li>• Objectors to the original proposal were not informed of this opportunity to comment on Wandsworth's plan.</li> <li>• The deadline is unreasonably short</li> <li>• The plan is 416 pages long, so impossible for most people to read.</li> <li>• The plan refers to the proposal in some places as the "Bridge" and in others as the "Footbridge", which makes automatic search on computer more difficult. This seems sneaky.</li> </ul> <p>The complete lack of detail is evidence that this is actually a cynical "place-marking" exercise, so that if Wandsworth again decides to start spending taxpayers' money on the project, no one will be able to complain that "it wasn't in the plan".</p> <p>This view is supported by the welcome fact that the minutes of the Finance, Resources and Climate Sustainability Overview and Scrutiny Committee, Wednesday, 10th February, 2021, 7.30 p.m. do not disclose any budget for expenditure on the Nine Elms to Pimlico Bridge</p>	The Local Plan supports the provision of the bridge. However, it is not specific with regard to a detailed landing points.	No changes to the Local Plan are considered necessary
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1124	General Local Plan Comment	<p>Dear Sir/ Madam,</p> <p>Representations to the Draft Local Plan: Pre-Publication Version</p> <p>We write on behalf of our client, Workspace PLC, to provide representations on the London Borough of Wandsworth (LBW) Draft Local Plan: Pre-Publication version.</p> <p>This representation is made in relation to 5-7 Havelock Terrace (the site), which is included within the draft Battersea Design and Technology Quarter (BDTQ) site allocation. Please note that a separate representation has also been submitted on behalf of Workspace PLC in relation to the Morie Street Studios site, which is included within the draft Ferrier Street Cluster site allocation.</p>	Comment noted. No changes to the Local Plan are considered necessary	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>This representation starts by providing comments on the draft site allocation, before providing comments on a number of relevant policies within the draft Plan.</p> <p>General Comments on Policies (see attachment appendix 1 for all proposed changes)</p> <p>This section provides further comments on the draft policies. Suggested amendments to policies are provided as tracked changes, where Strikeout Red = suggested deletion and Underlined Blue= suggested addition.</p>		
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1137	General Local Plan Comment	<p><b>See attachment for full representation which includes appendix 1 Site Allocation with amendments and appendix 2 Feasibility Study.</b></p> <p>Dear Sir/ Madam,</p> <p>Representations on the Draft Local Plan: Pre-Publication version</p> <p>We write on behalf of our client, Workspace PLC, to provide representations on the London Borough of Wandsworth (LBW) Draft Local Plan: Pre-Publication version.</p> <p>This representation is made in relation to the Morie Street Studios site (the Site), which is included within the draft Ferrier Street Cluster site allocation. Please note that a separate representation has also been submitted on behalf of Workspace PLC in relation to Havlock Terrace, which is included within the draft Battersea Design and Technology Quarter (BDTQ) site allocation.</p> <p>This representation starts by providing comments on the draft site allocation, before providing comments on a number of relevant policies within the draft Plan.</p> <p><b>Summary</b></p> <p>We look forward to reviewing further iterations of SPD as it progresses and thank you for the opportunity to provide comment.</p>	Comments noted. No changes to the Local Plan are considered necessary	No changes to the Local Plan are considered necessary
Dr Rosena Allin-Khan (MP)				1187	General Local Plan Comment	<p>Introduction:</p> <p>As the Member of Parliament for Tooting, I accept the objectives and ambition of the Pre-Publication Wandsworth Local Plan (WLP/the Plan) and the spatial strategy that it sets out. The newly published London plan provides an updated London wide policy framework that will strengthen and underpin many policies, which I embrace.</p> <p>However, I am aware that this consultation is occurring at a time of great uncertainty, both for officers at the Council and for members of the public. Indeed, the long-term economic and social impacts of the coronavirus pandemic make the plan unpredictable, particularly in relation to the growth estimates made within the documents. This plan will need to be applied relatively to the ever-changing economic and social landscape within Tooting to ensure that the full benefit of these proposals are achieved.</p>	Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1291	General Local Plan Comment	<p>We would like to thank the council for taking the time to put this together and circulating it for comments. It is obvious that a lot of effort had gone into this. On the whole, we think it is a good plan but believe it could be improved. We have presented out review in a bullet pointed format to ease reading and where possible provided reference to particular sections of the draft local plan. We have separated our comments into two parts: - suggestions for changes to the plan and - clarifications, where we would like additional information to be added to report to aid the reader. 1 Introduction We would like to make the following suggestions: - Carry out fresh assessments of the prospect for growth in population in the Borough to take into account to the effects of COVID-19 (1.23)</p>	The Local Plan recognises that the ONS population projection estimate was prepared prior to the COVID-19 pandemic, and therefore does not necessarily reflect potential changes in relation to internal and external migration patterns. This can be kept under review and any impact on the Local Plan will be established. The comment is noted; but there is no amendment for the Local Plan required.	No changes to the Local Plan are considered necessary



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Cyril Richert	Clapham Junction Action Group			1649	General Local Plan Comment	<p><b>See attachment for associated graphs, pictures, tables and footnotes.</b></p> <p>Preliminary comment</p> <p>Formal consultation on Local Plan must held in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 which sets out what Local Planning Authorities are required to do in relation to the preparation of a Local Plan. Although there is no specific duration for such consultation, the common practice is to allow a 12-week period (sometime more). For example, the draft new London Plan (525 pages) was published in December 2017 and was followed by a three-month consultation; the draft Local Plan for the London borough of Haringey was initially set to last for 11 weeks, however they notified of an extension of the consultation period for an additional 4 weeks (for a total of 15 weeks) explaining:</p> <p>We note that it has been a particularly challenging time to respond to a consultation so we have left our dedicated engagement website open for comment until 1 March 2021.” 1</p> <p>We fail to understand why Wandsworth has refused to consider the constrained expressed by CJAG and seconded by the Battersea Society at the Forum meeting on 20 January 2021, clearly stating that even with the pandemic and lockdown affecting the country, only 8 weeks were allowed for unpaid volunteers in community groups to scrutinize the dense 416 pages of the Local Plan, the 163 pages of the new Sustainability appraisal and the 26 policies maps. And not even considering the 152 pages of the dense Issues Document Consultation Statement that need to be compared to seek responses from the planners to previous comments.</p> <p>In addition, the poor consideration given by Wandsworth Council to previous consultations does not encourage the consequent amount of effort necessary to provide a detailed response. Just as a reminder:</p> <ul style="list-style-type: none"> <li>• CJAG’s proposal for planning reforms<sup>2</sup> published in May 2018: No response from the Council, despite repeated promises from Cllr Guy Humphries<sup>3</sup>, current chair of the Planning Application Committee for Wandsworth.</li> </ul> <p>Consultation on Community involvement in January 2019<sup>4</sup> : No response/No output.</p> <ul style="list-style-type: none"> <li>• Consultation on draft Local Plan in March 2019<sup>5</sup> : No response or information a year later/output → only available 21 months later, in November 2020</li> <li>• Workshop to discuss the future Local Plan on 17 January 2020 + written contribution from CJAG<sup>6</sup> : Output ?</li> </ul> <p>For the past 10 years, our comments were systematically dismissed. Societies and community group in Wandsworth teamed together to publish an open letter, which said: “Wandsworth Borough Council is falling far short in putting localism into practice in its planning procedures. It has failed to listen to its residents and the groups that represent them, on numerous occasions.” The Putney Society, an amenity society founded in 1959, refused to take part to the local plan consultation in 2015 for those reasons.</p> <p>The only proper consideration received for our submissions was during the government inspector’s examinations. As a reminder, it led the inspector to write in July 2015 that the “[policy] documents as a whole are ineffective”, which is exactly what we said and was ignored by the Council.</p> <p>Time is our most valuable asset, it can never be recovered, recycled or otherwise returned to us once spent. Why is this important, you ask? Because the process involved in attempting to exercise our democratic rights through due process seems to have a been great waste of time in the past. Time that</p>	Appropriate consultation meeting statutory requirements has been undertaken. Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>could have been spend in more fruitful attempts at enhancing the comfort and value of our lovely borough.</p> <p>However, we have great faith and aspiration and once again, we have dedicated much time in preparing this submission, in the hope that it will receive proper consideration and result in substantive changes in the Council policies.</p>		
Cyril Richert	Clapham Junction Action Group			1651	General Local Plan Comment	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>Comments on the draft local plan</p> <p>1. Introduction</p> <p>1.1 page 4</p> <p>placemaking principles to guide change and support smart growth over the next 15 years.</p> <p>There is a lack of immediate definition of what the planners mean by “smart growth”. According to Wikipedia, it means “an urban planning and transportation theory that concentrates growth in compact walkable urban centres to avoid sprawl.” It also explains that the term is particularly used in North America while in Europe and particularly the UK, the terms “compact city”, “urban densification” or “urban intensification” have often been used to describe similar concepts.</p> <p>However, it seems obvious that for the general public, urban intensification and urban densification are not popular, especially in the current aspiration for a greener more ecologically friendly living environment (and actually, Wandsworth Council has set itself the target of becoming the greenest borough in inner London8 , isn't it?).</p> <p>“Smart growth” is later (par. 1.9) defined as the ideal place to live (using all superlatives such as “greenest” and “best place”). As it seems obvious that nobody would promote a dystopian vision where it would deliver a bad start of life, in polluted and unsustainable areas, where business is dying. Therefore, instead of twisting an American expression9 , we strongly encourage to define more accurately the “vision” expressed for the borough of Wandsworth.</p> <p>Par 1.1. We consider that planners should refrain using American jargon to mislead the UK public and either replace by British English equivalent (i.e. urban densification or maybe instead “new urbanism”). We suggest to use the wording “urban development” as in “to guide change and support smart growth urban development over the next 15 years”.</p> <p>Whilst facilitating development</p> <p>The Local Plan Review 2018 - Issues Document states, on page 2, that its goal is “to manage change”. This is a more neutral wording that is supported, while the current version means that the local plan first and foremost ambition is to “make easier” planning permission grant, implying that it would be currently more difficult.</p> <p>Life has not been difficult for developers in Wandsworth for the last 10 years, rather the opposite. A striking example is the current changes in York Road and the Winstanley/York Regeneration Project where the local plan in 2010 was mentioning 5 storeys for places where the Council granted permission for a 20-storey tower in 201810. We could make exactly the same comments for many other major sites: B&amp;Q, Smugglers Way - SW18, max 8 storeys in 201011, granted for 10 to 18 storeys; Homebase, Swandon Way - SW18, max 8 storeys in 201012, granted for up to 17 storeys; South Thames College/Welbeck House/17-27 Garratt Lane13, sensitive for tall buildings above 4 storey, currently developed with towers up to 26 storeys; Homebase - York Road14</p>	<p>Comments noted.</p> <p>Paragraph 1.1 provides a broad introduction.</p> <p>The term "Smart Growth" at paragraph 1.9 is used in reference to the Recovery Plan in response to the Covid-19 pandemic. Smart Growth – Wandsworth’s Recovery Plan was reported to Finance and Corporate Resources Overview and Scrutiny Committee – 2 July 2020 and Executive – 6 July 2020. Since then, the Council has moved away from the term, and the Local Plan will instead use, 'Inclusive Growth'. This fits with the National Planning Policy Framework, where there is a reference to the 2030 UN Agenda for Sustainable Development, in which Global Goal 8 talks about promoting sustained, inclusive and sustainable economic growth Paragraph 1.1 has been amended to read: "Whilst facilitating the management of development...."</p>	<p>Amend final sentence of paragraph 1.1 to read: "Whilst facilitating the management of development...."</p> <p>References to 'Smart Growth' to be updated to refer to, 'Inclusive Growth'.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						labelled as "likely to be inappropriate" for buildings above 8 storeys, and currently under-construction with 6, 7, 9, 11 and 21 storeys; 12-14 Lombard Road15 labelled as "likely to be inappropriate" for buildings above 8 storeys and now with a tower of 28 storeys (granted less than 5 years after the local plan was accepted)... and we could cover several pages with similar cases.  Par 1.1. We consider that using the wording "facilitating" is inappropriate and would like the planners to revert with original wording of "manage change" while highlighting the importance to protect the character of the borough, as in "Whilst facilitating managing development, the new Local Plan will also primarily protect and enhance what is good and special about Wandsworth..."		
Cyril Richert	Clapham Junction Action Group			1684	General Local Plan Comment	Conclusion  We regret that the Council did not offer more help in the consultation process, especially with the tightest time frame and a lack of commitment to engage directly when requested by the community.  'Very thorough consultation with written submission requested; then no response for 21 months; eventually a 153-page Consultation Statement document to analyse, followed 2 months later by more than 500 pages for the draft local plan to comment within...8 weeks) ...' This ping-pong game that the Council is promoting with written statements exclusively and no direct communication and dialogue offer, is pulling enormous strain to volunteers that are submerged by requests to comment with the absence of any proper interaction.  Once again, the Inspector examination process could be the only opportunity to confront arguments and get direct responses. A proper community engagement should expect better from the Council.	Appropriate consultation meeting statutory requirements has been undertaken. Comments noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Retirement Housing Consortium	Retirement Housing Consortium	Carla Fulgoni	Planning Manager  The Planning Bureau	1708	General Local Plan Comment	We are concerned that there is no viability evidence underpinning this plan. Without this we are unable to test the application of policies against the viability of specialist accommodation for older people such as retirement and extra care housing. We would welcome the opportunity to scrutinise this if and when one is made available.	Comments noted. The whole Plan Viability Report will be made available at the Regulation 19 stage of consultation.	No changes to the Local Plan are considered necessary
Shahina Inayathusein	London Underground Ltd			51	1.2	We 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 as per TOWN AND COUNTRY PLANNING, ENGLAND-The Town and Country Planning (Development Management Procedure) (England) Order 2015 issued on 16 <sup>th</sup> April 2015.  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.	Commented noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				56	1.9	I support these as broad priorities.	Support noted.	No changes to the Local Plan are considered necessary
Cyril Richert	Clapham Junction Action Group			1652	1.9	<b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b>  1.9 page 5  Smart Growth.  Where is the justification for using this American jargon, which translate in British English as "intensive development" 16 does seem to bring confusion to the paragraph? As we said earlier, "Smart growth" seems redefined by the planners as the ideal place to live (using all superlatives such as "greenest" and "best place"). As it seems obvious that nobody would promote a dystopian vision where it would deliver a bad start of life, in polluted and unsustainable areas, where business is dying. Therefore, instead of twisting an American	The term "Smart Growth" at paragraph 1.9 is used in reference to the Recovery Plan in response to the Covid-19 pandemic. Smart Growth – Wandsworth's Recovery Plan was reported to Finance and Corporate Resources Overview and Scrutiny Committee – 2 July 2020 and Executive – 6 July 2020. Since then, the Council has moved away from the term, and the Local Plan will instead use, 'Inclusive Growth'. This fits with the National Planning Policy Framework, where there is a reference to the 2030 UN Agenda for Sustainable Development, in which Global Goal 8 talks about promoting sustained, inclusive and sustainable economic growth.	References to 'Smart Growth' to be updated to refer to, 'Inclusive Growth'.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>expression, we strongly encourage to define more accurately the "vision" expressed for the borough of Wandsworth.</p> <p>NB: In the London Plan 2011, they also used main principles as "LONDON'S PLACES" and "LONDON'S PEOPLE" without the need to rely on the American concept of Smart Growth.</p> <p>1.9 This paragraph has no purpose at all, rather than bringing confusion, and should be deleted</p> <p>In our previous submission , we said: "The vision is <u>a list of generic principals</u> that could easily be applied to Birmingham or Liverpool. There is no mention of preserving the local environment by preventing bulky and overbearing buildings and promoting developments in relation to neighbouring property, the street and other public spaces and it should be added."</p> <p>Any new development should aim at minimising the adverse effects on people's day to day lives, and not only "Enabling people to get on in life".</p>		
Susie Morrow	Chair Wandsworth Living Streets			663	1.11	<p>5.Consultations</p> <p>We note that undertaking Consultations is a statutory obligation when determining the consent and implementation of new planning consents or changes to the public realm. However, we also note that the WBC processes often feel "opaque" to the general public and clarity re: the approach to consultations would be very much appreciated, and should be addressed and well articulated in the dLP.</p> <p>As an example, a planning application which is overwhelmingly rejected by local residents will often gain consent (e.g. Atheldene/Garratt Regeneration) without any amendment, whilst changes to the legacy streetscape will almost always be rejected with relatively few objections (but which slightly exceed those in favour).</p> <p>We would therefore like to see Consultations addressed as a specific section, with a clear process set out, and identifying how consultations work, the timeframes, the decision-making forums, and include other key information that wider stakeholders may find valuable when participating in the consultation process.</p> <p>We would also urge WBC to consider exploring other approaches to consultations that are successfully used elsewhere to gain a more inclusive and insightful perspective from a broader local demographic, perhaps through sampling. Presently consultations tend to attract opinions at the extremes of pro/against which frequently results in frustration and disengagement if people feel they are not being heard. A more inclusive consultation process would enable quieter voices be heard, whilst getting a broader and more useful insight into local resident/business concerns, expectations and proposals for scheme improvements. Exemplars of best practice in talking to people about the future of their streets are increasingly available across London.</p> <p>Scheme tracker - the key to successful consultation is openness, and ensuring any variations against consented schemes are shared as proactively as possible, such that local stakeholders understand the balance of risk between local residents, the council and developers/land owners. A clear tracker for each development from submission through to delivery and completion, including highlighting any changes, would be extremely useful.</p>	<p>Consultation on the Local Plan (Regulation 18) was successful and in accordance with the Statement of Community involvement. Further, the recent appointment of a Senior Planning Engagement Officer offers the opportunity to develop approaches to planning policy consultations. No changes to the Local Plan are considered necessary.</p>	<p>No changes to the Local Plan are considered necessary</p>
Mrs Beryl Leigh				489	1.17	<p>LOCAL PLAN 2021</p> <p><b>Comments on the Draft Open Space Study (Jan 2021) in the Local Plan evidence base</b></p>	<p>Policy LP21 - Allotments and Food Growing Spaces provides guidance for the protection and provision of allotments and community based food growing space. No changes to the Local Plan are considered necessary.</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>I am particularly interested in Part 8 of the Study: 'Allotments and Growing Spaces'.</p> <p>Only the 9 Council owned allotment sites are considered in the Study. Are the Council or its consultants aware of other private provision of allotments? As one of the aims is to 'provide evidence to support the protection and enhancement of open spaces' it's important that as many as possible of the sites in every category are taken into account.</p> <p>In the Southfields ward, for example, there is a sporting club which has a number of small allotments on its site and it is currently applying for recognition as an Asset of Community Value.</p> <p>The Study spells out that current provision of allotment space in Wandsworth is well below the NSALG standard and that there is a very long waiting list. It says that allotments are highly valued and often identified by local communities as important forms of open space. In fact, a finding in the July – Aug 2020 community survey (Part 3 of the Study) was that respondents who felt there was a lack of open space provision in their area cited 'allotments' more than any other type.</p> <p>In the final point of the summary of Part 8 the consultants note that all allotments are assessed as high value reflecting the 'associated social inclusion and health benefits, their amenity value and the sense of space offered by provision'. I agree but am disappointed they have not also drawn more attention in this Study to the contribution allotment spaces make to availability of wildlife habitats, to green corridors and to biodiversity.</p> <p>The existing Local Plan Core Strategy (2016-18) appears to have only one reference to allotments. In the <b>Core Policies for Places: PL4 (Open space and the natural environment)</b> the word appears in a long list of open space types which the Council undertakes to 'protect and improve' in a very general statement.</p> <p>I want to see a more specific commitment to protecting allotment and food growing spaces in the updated Local Plan given the major shortfall identified in the Study and the risk that there will be pressure to reduce rather than increase the number of plots because of the limited amount of spare land.</p> <p>Please note that Richmond Council had already set out a more detailed policy in its existing Local Plan (<b>Policy LP32: Allotments and food growing spaces</b>) –</p> <p>'The Council will protect existing allotments and support other potential spaces that could be used for commercial food production or for community gardening. The value of allotment space in visual, ecological, biodiversity and historical terms will also be taken into account where there is development pressure on the land.'</p> <p>I suggest Wandsworth should now adopt something similar, but given its current failings in this area should make a specific commitment in the Local Plan Update to protect <b>all</b> existing allotment provision as well as looking for opportunities to expand it.</p>		
Elizabeth Hopkirk				57	1.22	<p>I am concerned about the poor quality of housing that permitted development rights often results in. I am also concerned that the proposed new use class E could have a devastating effect on Wandsworth's commercial centres, especially the smaller ones where conversion to housing might be more valuable to property speculators than existing uses such as medical centres, creches, retail, pubs and other commercial uses. I've seen this on the Grid in Southfields where my mother lives. They've lost uses including the newsagent which was a key social hub for the community to meet and talk and get to know each other. The loss of an amenity like this appears unimportant at a borough level but has implications for community cohesion locally. I know your hands are tied by central gov't but I feel it's important to raise the dangers of PD rights.</p>	<p>The Council's response to consultation on Permitted Development Rights can be found at <a href="https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/response-to-government-consultations/">https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/response-to-government-consultations/</a>. The proposed PDR could have an irreversible and significant impact on the supply of land for economic and commercial development, including the scale and variety of job opportunities available, all of which will ultimately influence whether our town and local centres continue to be attractive 'destinations' that people will want to go to. In addition, if the diversity of uses within town and local centres is eroded and the balance shifts to residential, cumulatively this could have further impacts including but not limited to reduced footfall, reduced attractiveness to visit, changes to travel and commuting patterns particularly if there are fewer local job opportunities, as well as potential impacts on both climate change and air quality. The Council is</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							making an Article 4 Direction across town and local centres, to include important local parades, to aim to ensure that such proposals remain within the control of planning policy.	
Ms Ute Lynch				275	1.25	<p><b>Waterman's Green:</b> I understand that Waterman's Green, originally known as Putney Bridge Shrubbery, was bought by Joseph Bazalgette and sold to London County Council and is now the responsibility of LBW. It is managed by the Park's Service, and I understand that it is a special policy area of archaeological priority. On what basis are the restaurants using this land? Has the Local Authority given them permission to use it by way of a lease or licence? If it's a lease, for how long?</p> <p><b>Thames Path and Pedestrian Underpass:</b> Has a discussion taken place between the owners and the Council prior to permission being given regarding the continuation of the Thames Path, by way of a pedestrian underpass? I am in favour of the Thames Path continuing under the Bridge via the vaults, to connect directly with Putney Wharf.</p> <p><b>Shared Space:</b> I have serious concerns about shared space between pedestrians, cyclists and e-scooters along the river, and the use of the pavements by cyclists and e-scooters along Lower Richmond Road. There appears to be no awareness of pedestrians. How can the priority and safety of pedestrians be ensured on the pavements and the river path?</p> <p><b>Reconfiguring the crossing</b> at the end of Lower Richmond Road/Putney Bridge: I am in favour of a simplified and safe crossing system.</p> <p><b>Houseboats:</b> I welcome temporary moorings of boats, but am concerned about permanent moorings of houseboats (especially those that look like floating portacabins which cannot move!). What infrastructure is intended to be put in place? Eg I would not be in favour of having a sewage pumping station for the boats to discharge their holding tanks. Particularly as the Pier is in front of restaurants and pubs and is a main thoroughfare for people to walk out with their families.</p> <p><b>Coffee shop:</b> What is the purpose of the intended coffee shop? e.g., will it be licensed as everywhere else in Putney seems to be? We already have a number of coffee shops in the area, including Putney Pantry and also some pop-up coffee stalls on the Embankment.</p> <p>Is it still proposed to combine the coffee shop with the bus shelter? At the current location of the bus stop, the pavement is far too narrow. Are you proposing to relocate the bus stop and if so, where to?</p> <p>Residents in Kenilworth Court are concerned about potential litter (bins along the Embankment are already overflowing), noise and light pollution.</p> <p>If the pavement is to be widened, the traffic is likely to be slower-moving, causing further emissions, resulting in more pollution.</p> <p><b>Lift:</b> is it still proposed to have a lift from Lower Richmond Road down to Waterman's Green? If so, please could you explain why this is necessary?</p> <p><b>Bus stop outside Kenilworth Court.</b> Can this be moved to the other side of the gates as exiting the gates is currently dangerous when buses are stationary. They often stop here for quite some time, particularly when they change drivers.</p> <p><b>Putney High Street</b></p> <p><b>Copenhagen Crossings:</b> Rule 170 of the Highway Code states that pedestrians have priority. The consultation document states that these "give the feeling of continuous pavement and the impression of pedestrian priority".</p>	Commented noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>However, we know several people who have nearly been hit by delivery drivers and cars, as it's not clear to everyone who has priority.</p> <p>The delivery drivers congregate near Barclays Bank causing the paving stones to look dirty - only a short time after having been laid, at great expense.</p> <p><b>Public toilets</b> – I understand that public toilets are supposed to be open during the pandemic, but it seems that the ones in Putney Exchange are closed. Are there any plans to open public toilets in Putney? I hear that delivery drivers are using the parklets as toilets.</p> <p><b>City Tree and Pollution</b>– we have more cars stationary on the High Street as the width of the road has been reduced. How effective is one City tree at filtering out all the particulates/additional fumes?</p> <p>I would like to see more done to address the pollution on the High Street, which is consistently one of the most polluted in London.</p> <p><b>Emergency vehicles</b> - I am also concerned about emergency vehicles being able to move down Putney High Street now the width has greatly restricted.</p> <p><b>Street Furniture:</b> In particular removing railings at junctions may look better, however their purpose is to delineate and protect the pedestrians from vehicles. Removing them in all circumstances may well lead to accidents.</p> <p><b>Parklets, Green Wall and Trees:</b> I am very much in favour of the parklets, and of having a green wall. How about installing a green wall on the cinema? I would also love to see more trees along the High Street, now we have these incredibly wide pavements!</p> <p><b>Defibrillator:</b> I think it's great to have a defibrillator but would prefer to see it situated in a prominent place on the High Street. A lot of people may not realise that there is one on Putney Bridge Road.</p>		
Paul Dolan				513	1.27	I believe that the local evidence is now out of date. Covid has brought in rapid changes, establishing Online Retail as the new normal and working from home, introducing the many to travelling locally only by foot and bike. The other rapid change that this local plan has not adjusted to is the max exodus of people away from London (some 670,000 people).	It is recognised that the Coronavirus pandemic has impacted the retail sector, brought changes to behaviour in working patterns, and resulted in demographic changes in London. The Council considers that the longer-term impact, however, remains difficult to fully understand at this stage, and is therefore committed to reviewing this once appropriate data is available. This understanding will be reflected in changes to the Local Plan through full or partial review of the Local Plan, but could also inform site-specific decision making, where relevant. The Council will also continue to monitor the health of its centres and vacancies, which provides a baseline for change within the borough.	No change to the Local Plan required as a result of this representation.
Mr James Thompson	Director Northport FPR Limited	Mr Kevin Goodwin	KG Creative Consultancy	438	1.27	<p><b>Evidence Base</b></p> <p>22. The HELAA advises at Stage 5 in relation to the evidence base to this document that "A detailed list of sites was produced, cross-referenced to maps of the site boundaries, with details of the assessment of each site, and projected delivery of housing or economic uses over time". It then however states "The list of sites or their estimated development capacities has not been publicly made available".</p> <p>23. The text continues "The assessment looks to indicate the broad capacity for residential and economic uses across all potential sites and does not allocate particular sites for particular forms of development". However the text in Section 3 of the Assessment provides a finite housing supply number that has been identified through the Assessment in stating "The housing supply identified through the assessment...".</p> <p>24. This figure is then used to justify "that the proposed London Plan target for Wandsworth of 19,500 net dwellings over 10 years would be met by the 20,700 net dwellings expected to be delivered over years 1–10 of the proposed local plan period, assuming the 19,500</p>	The full list of sites, including their estimated development capacity, was made public as part of the revised HELAA.	Details of all sites with development potential included in the HELAA.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>target is annualised to 1,950 and then rolled forward each year for the period beyond the 2019/20–2028/29 London Plan target". However this seems too coincidental that the proposed number of dwellings will meet the housing need. On the basis of the 'evidence base' there is no methodology that would allow a consultee to examine, sensitivity test and comment upon the assumptions made for sites, as they are all hidden.</p> <p>25. For the same reasons we also need to criticise Table 3 of the HELAA that alleges that the Council can meet the tests of the NPPF. The text states "Table 3, below, summarises that 142% of the 5-year housing supply requirement of the National Planning Policy Framework is met, and this clearly provides for the required 5% buffer to ensure choice and competition in the market for land". Indeed it is anything but clear that the Council can meet its requirements under the Framework.</p>		



## Chapter 2: Strategic Context, Vision and Objectives

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	ID	Number	Comments	Council Response	Outcome
Mr David Patterson				949	2.1	<p>First let us look at the projected population figures which show a continuing increase from a current figure of 329,700 to 377,300 in 2040. This shows an endless development with no end in sight. There will be a tipping point when this continued population increase in the borough will have to stop but there is no suggestion in these figures that it will occur in the period covered.</p> <p>Planning for the future is difficult because of changes that can take place so rapidly. One of the features of modern life is that changes come about quicker and from unsuspected directions. Some are already here such as the diminishment of the importance of town shopping centres with shop closures as a result of shopping online. This is because people can consider a far wider range of goods online than they can see in a shopping centre. Some goods and services will be immune from this but already many retail shops have succumbed.</p> <p>Likewise we could see many alterations to transport. This is not only because shopping centres will have less pull but also the notion of personal cars may well fade in the future with autonomous vehicles being more convenient and reliable. This could mean less road space devoted to parked vehicles. More people working from home at least for part of the time could affect the demand for transport –particularly public transport.</p> <p>With short local journeys these should be made on foot or by bicycle where possible. This is especially so while petrol or diesel cars are being used. For petrol cars the effect of catalytic converters does not kick in right away.</p> <p>There is not much mention of waste disposal, but this is important if we want to be green. For residents there should be free collection of bulky items at set times in different localities to cut down on fly tipping. Also there should be free collection of hazardous waste such as old paint tins or other chemicals which households accumulate.</p> <p>I can see no mention of wood burning stoves. As these can cause air pollution inspection of output from these should be carried out.</p> <p>The replacement of front gardens with paving should be denied.</p> <p>The text talks about Wandsworth aiming to be the “greenest borough in inner-London”. This is a strange aim as we do not know how green other inner-London boroughs will become. It could be a very low bar considering how much green space Wandsworth has to start with. A better aim would be to reach certain objectives.</p>	Comments noted. No impact on the Local Plan	No changes to the Local Plan are considered necessary
	Wandsworth Cycling (London Cycling Campaign)			954	2.1	<p>1. Vision, opportunity and objectives</p> <p>There is much which strongly supports improvements for active travel, and specifically cycling. We have used the following to guide our feedback (note in the pdf we have highlighted the key supportive statements in green - for reference only).</p>	Comments noted. No impact on the Local Plan	No changes to the Local Plan are considered necessary
Spencer Barnshaw	Secretary Battersea and Wandsworth Trades Union Council			1147	2.1	<p>Chapter 2 Strategic Context, Vision and Objectives</p> <p>It is clear that the plans propose a great deal more development across the borough.</p> <p>Whilst this is generally positive, the aim of improving the borough as a place to live and work, with 21 century access to education, recreational and entertainment opportunities must be delivered fairly so that all sections of the community can prosper.</p>	Comments noted. The Local Plan takes an inclusive approach, promotes affordable housing and promotes improvement to quality of life. No impact on the Local Plan.	No changes to the Local Plan are considered necessary

						<p>All those who work in the borough must be able to afford to live in the borough and be able to access Education, Health Care, Housing and other facilities and amenities which affect their lives.</p> <p>The plan clearly identifies the main areas of inequality within the borough, but does not identify clear support for those communities. The reality is that the proposed estate developments will price many existing residents out of the borough, specifically because the issue of low pay has not been addressed.</p> <p>BWTUC believe that in dealing with such diverse development plans the council must adopt a clear rationale and policy which protects those communities. This must accompany all physical development planning and ensure continuity for all existing residents.</p> <p>It is noted that a large proportion of low paid workers in the borough already cannot afford to live in the area and local pay rates do not generally allow workers to buy property in the area or rent locally due to the high cost of both.</p> <p>In order to break this trend there has to be far more affordable housing, more good quality local jobs with good pay and an end to outsourcing and sub-contracting, which is focused on cutting pay. The Council must adopt the London Living Wage as a baseline for all employment across the borough.</p> <p>Local procurement policies need to be fully committed to ending the two-tier workforce and low pay.</p> <p>There is insufficient council and low cost housing contained in any of the individual area plans.</p> <p>Recent developments and proposed further regeneration do not in reality address many issues in terms of a greener borough and greener economy.</p> <p>Air pollution is referred to but the support for changes to infrastructure which would make them affordable is inadequate.</p>		
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1292	2.1	<p>2 Strategic Context, Vision and Objectives We would like to make the following suggestions: - 'Maintaining the lowest council tax' is a distinct goal from achieving best value for money. We are of the view that better value for money can be made with shrewd investments which support and enable the local community to be the best that it can be. For example an increase in council tax to allow better care in the community could deliver better value than the limited service provision current budgets provide for.</p>	Paragraph 2.31 reports the Corporate Plan. The level of council tax is not a matter for the Local Plan. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1488	2.1	<p>We note that a number of the area strategy policies have a general clause which refers to the need for an assessment of 'community facilities related to health and schooling'. This could form part of the updated work on the IDP. We suggest that this should be a boroughwide statement which could form part of clause A 4 of PolicyLP17 Social and Community Infrastructure.</p>	The forthcoming IDP does include reference for the developments creating significant new residential development to assess and then provide additional infrastructure where needed. Agreed the wording from the Area Strategies is more suited to the Social and Community Infrastructure policy.	Wording relating to the need for an assessment has been moved from the Area Strategies to LP17 Social and Community Infrastructure Policy.
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1489	2.1	<p>There is a desire for infrastructure provision in growth areas to be treated equitably which is welcomed. However, whilst population growth is an important factor, ensuring equitable access to health and care services is also dependent on demographic change, particularly an ageing population and changing health needs. This will require investment in services and infrastructure across the borough.</p>	Comments noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Michael Atkins	Senior Planning Officer Port of London Authority			1441	2.1	<p><b>See attached the representation for context</b></p> <p>1. Strategic Context, Vision and Objectives</p> <p>The Local Plan vision includes the goal that by 2038, the borough will have protected key industrial land in the Wandle Valley and parts of Nine Elms and north-east Battersea to ensure there is a strategic reservoir for industry, warehousing, distribution and waste management facilities. It is therefore disappointing that the vision includes no reference to the boroughs five Safeguarded Wharves (Cringle, Kirtling, Middle, Smugglers and Pier Wharves). These wharves are safeguarded through Ministerial Direction and supported by robust policy in the current and emerging London Plan. The review of London's safeguarded wharves has recently been completed by the Mayor of London and</p>	Comment noted. Update the first sentence of bullet 12 of the Vision to include safeguarded wharves.	Update the first sentence of bullet 12 of the Vision to read: "We will have protected key industrial land in the Wandle Valley, parts of Nine Elms and north-east Battersea (including safeguarded wharves) to ensure we have a strategic reservoir for industry, warehousing, distribution and waste management facilities which are better located away from residential areas."

						<p>on the 19 February 2021 the updated Ministerial Directions were issued by the Secretary of State which include for the continued safeguarding of all five of Wandsworth's wharves. This review has reiterated that these wharves remain viable and are supported by policies at national, regional and local levels, including through the boroughs current Local Plan in policy PL9 (River Thames and the Riverside). Given the amount of proposed development within the borough up to 2038, with an increased housing target of between 1,950 homes per year (increasing from 1,812 per year in the 2015 London Plan) and the role that these wharves could contribute in achieve the sustainable development of these homes it is considered essential that the use of the River Thames and it's landing points are used to their full potential and supported in the long term in the Local Plan.</p>		
Cyril Richert	Clapham Junction Action Group			1650	2.1	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>General Comment</p> <p>A majority of section 2 Strategic Context, Vision and Objectives appears to be a mix of political agenda and wishful thinking.</p> <p>In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we expressed concerns that "The vision is a list of generic principals that could easily be applied to Birmingham or Liverpool." No comment was received from the Planners.</p> <p>We were puzzle by the structure of the plan, choosing to start with what we consider a long political pledge, and immediately after moving to specific area strategies. Global policies such as Housing, Transport and Economy are addressed later in the document.</p> <p>Suggest: Move from general to specific</p>	<p>It is not possible to require existing operators to enclose existing facilities unless they submit a planning application for their site. If a facility is in breach of its environmental permit, this is a matter for the regulator rather than the Local Plan.</p>	<p>No changes to the Local Plan are considered necessary</p>
Isabella Jack	Sustainable Development Advisor  Natural England			1608	2.1	<p><b>See attachment for context and appendices.</b></p> <p>1. Strategic Context, Vision and Objectives</p> <p>Natural England advises that the Plan's vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, Rights of Way Improvement Plans and Green Infrastructure Strategies.</p> <p>The introduction of the first Wandsworth Environment and Sustainability Strategy (WESS), in 2019, is a positive step towards furthering Wandsworth's commitment to the natural environment and we are pleased to see the ambitious commitment to making Wandsworth the greenest inner London borough. While we are encouraged by the mention of biodiversity in the targets of the WESS, we note that there is no mention of Biodiversity Net Gain in the environmental objectives of the local plan draft. Natural England would recommend that these objectives could be strengthened with the inclusion of an objective targeted specifically at ensuring Biodiversity Net Gain across all developments. There is more information about Biodiversity Net Gain in Section 3 of this response.</p>	<p>As for 1354, Environmental Objective 2 should be amended to promote biodiversity net gain.</p>	<p>Environmental Objective 2 should be amended to read: "Protect and enhance open spaces and the natural environment, to support people's health and wellbeing and the borough's habitat and biodiversity objectives promoting biodiversity net gain."</p>
Ms Nicola Cameron				1695	2.1	<p>Firstly I do not recall seeing any mention of this proposal or the Draft Local Plan itself in the various channels used by the Council to connect with residents, it was effectively raised by The Putney Society through word of mouth to me. Secondly it seems that no thought has been given to the severe strain on amenities and the quality of life for us residents living close to Putney Bridge and the High Street. Utilities, to include provision of good internet access, and the living environment are under constant pressure as the population grows and offices and more are changed to residential use. Let me be clear, I do understand the need to re-purpose building stock and address the issues of the high street. We welcome the recent efforts to improve the quality of the High</p>	<p>The Local Plan Draft Regulation 18 version was widely publicised across the borough. The Council conducted an Open Space Study during Lockdown which has provided detailed findings as to how open spaces in Wandsworth are used and this information will be used to prepare better management and maintenances plans for those open spaces.</p>	<p>No changes to the Local Plan are considered necessary.</p>

						<p>Street, much needed, this proposal seems to fly in the face of that. We applauded the idea of a "Leafy Putney" once more!</p> <p>The current pandemic has seen parks and the riverside effectively become overcrowded and unpleasant at times, difficult to negotiate in fact, so we should learn from this. Dare I mention some of the simple things, dogs fouling our pavement once more (new owners, I guess), litter, street drinking even although there is a ban, noise... if a litter bin overflows people just leave their litter next to it for some reason? Serious increases in population by development can only exacerbate things given what we are seeing now. This is without going into the traffic issues and the log jams that are a part of everyday life already, or the cyclists and new electric scooter users who are a rule unto themselves.</p> <p>I have seen the letter from our residents' association, so simply let me herein just echo my support of that letter and the issues it raises. I sincerely hope that these concerns are considered and that our local Thamesfield councillors will be raising these issues in committee.</p>		
Ms carol Rahn				1696	2.1	<ol style="list-style-type: none"> <li>1. I'm sure many people worked hard to draft the Local Plan, but it is not a plan. It is a sprawling compendium with too many objectives, policies and priorities. No one reading the plan will have any clearer idea what exactly Wandsworth plan to do.</li> <li>2. Wandsworth have a history of ignoring the principles they enunciate and I fear, however worthy the principles and aspirations in this Local Plan they, too, will be ignored whenever convenient.</li> <li>3. The plan refers to the Urban Design principles as though they were a definitive guide to what will be approved in any of the defined areas. They are nothing of the sort. Rather, they are general observations, interesting in some cases but in no way do they provide practical design guidance.</li> <li>4. Any Local Plan needs to be re-thought in light of coronavirus and our current economic situation.</li> </ol> <p>There are many internal contradictions in the plan, beginning with the housing objectives which are likely incompatible with the strategy for most of the areas profiled leaning toward "conserve" rather than "transform."</p>	Comments noted	No changes to the Local Plan are considered necessary.
Miriam Howitt				111	2.2	<p>Point 2.2 Since Brexit and Covid 19 the population of London has significantly fallen, which will result in the drop of the number of new dwellings required. A great number of tall blocks are in construction in many London Boroughs which, when finished, may satisfy the demand at that level. The need is for Council Housing and Affordable Dwellings for those who cannot afford the high cost of these. A realistic understanding of what is "affordable" is necessary, otherwise people will still be homeless. The demand for Offices and Retail Premises will change as a result of many continuing to work from home, as they have become used to in Covid Lockdown. The Government is considering changes to Planning Regulations to allow Change of Use of these categories without the need to apply for Planning Permission, which may mean that a number of these will become dwellings. Wandsworth Council will not be able to assess need while these factors are stabilising. Re-purposing of existing buildings should be prioritised over demolition and re-building.</p>	<p>Comment noted.</p> <p>Policy LP25 Affordable Housing seeks to maximise the provision of affordable housing. Policy LP33 Specialist Housing for Vulnerable People seeks to ensure there is appropriate housing available for older people.</p> <p>The Plan will be monitored through the AMR and Sustainability Appraisal indicators. This will allow identification of any issues arising from the implementation of the Plan. No changes to the Local Plan are considered necessary.</p>	No changes to the Local Plan are considered necessary
Cyril Richert	Clapham Junction Action Group			1653	2.2	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>2. Strategic Context, Vision and Objectives</p> <p>2.2 page 10</p> <p>it is worth emphasising that the ONS estimate was prepared prior to the COVID-19 pandemic, and therefore does not necessarily reflect potential changes in relation to internal and external migration patterns. It is anticipated that much of this population growth will occur within the investment and growth areas of the borough. This will result in a need for more homes, jobs, services and community facilities, such as schools and healthcare.</p> <p>The Planners are right to highlight that the estimate was prepared prior to the pandemic crisis and therefore reality is likely to be different. However, it should also consider that, eventually, a Brexit deal was signed and the UK left the EU, making then much more difficult for EU citizens to come and work. It is still to be seen if this will be compensated by migrants from other countries, and in any</p>	Comments noted	No changes to the Local Plan are considered necessary

						<p>case the current government announced that they wanted to cut drastically immigration.</p> <p>In fact, London's population is set to decline for the first time in more than 30 years, driven by the economic fallout from the coronavirus pandemic, people reassessing where they live during the crisis, and Brexit, according to a report published in 2021 by accountancy firm PwC<sup>18</sup>. In 2019, net migration of EU citizens to the UK fell to 50,000 people and according to PwC, it could turn negative in 2021 – meaning that within the year, the number of EU nationals who leave the UK could be more than those who settle – for the first time since 1993.</p> <p>It should be little surprise as back in August 2020, a survey by the London Assembly<sup>19</sup> found that 4.5% of Londoners – or 416,000 people – were very likely to move out of the city within the next 12 months. This survey even said that one in seven Londoners (14 per cent) wanted to leave the city as a result of the COVID-19 pandemic, and a third of Londoners (33 per cent) want to move to a new home.</p> <p>The result is likely to be particularly notable in Wandsworth, as a report from PwC in Partnership with ONS in 2017<sup>20</sup> showed that Wandsworth had 20-30% of EU migrants.</p> <p>Therefore, the pre-Brexit, pre-Covid Wandsworth Population Projections (GLA 2018- Based Housing-Led) is certain to be false. The Census 2021 will likely give more accurate results on the trend, but we are publishing a Local Plan providing guidance for the next 15 years cannot be based on outdated and now-invalid data.</p>		
Cyril Richert	Clapham Junction Action Group			1655	2.2	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>2.2 The paragraph and the following parts of the housing projections should be systematically worded with the “pre-Brexit + pre-Covid” precaution and reviewed before final submission to include the latest data. By the time of the Independent Examination in Public late 2022, the trend might be completely opposite to the current 2018 forecast and therefore all evidence produced in this plan would be void, even before publication.</p>	There is no evidence that Brexit or the Covid-19 pandemic will reduce the demand for housing. This will however be monitored over time.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			280	2.3	<p>10% over 65 and rising, whilst numbers of under 16's are reducing. This all suggests that local housing is unaffordable to young families.</p> <p>Rising number of older people show the need for council information and communication to be provided using methods accessible to all and for appropriate and accessible community spaces.</p>	<p>Policy LP25 (now LP23) seeks to maximise the provision of affordable housing.</p> <p>Policy LP33 (now LP31) seeks to ensure there is appropriate housing available for older people.</p>	No changes to the Local Plan are considered necessary
Dr John Fletcher				532	2.3	<p>I'm largely commenting on the Tooting area strategy (though I will comment on other sections). That strategy seems to be largely focused on the two main roads running through the town centre. So two comments here. Young people are less likely to drive (<a href="https://www.bbc.co.uk/news/science-environment-44849381">https://www.bbc.co.uk/news/science-environment-44849381</a>) as are those that are Black, Asian or Minority Ethnic (<a href="https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest">https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest</a>)</p>	Comment noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				58	2.40	<p>I would like to see us encourage both the development of specialist 'older housing' developments which would be attractive enough for older people like my mother to give up their homes to move into, with the promise of community and light-touch support.</p> <p>I would also like to see us experiment with multi-generational setting where older people and families and singles can live in community. They could be created by developers or community land trusts and self-build groups. There are many such places in Germany and Belgium and it feels a real gap in provision in the UK.</p>	Policy LP33 (now LP31) supports the provision of specialist and supported housing, in line with the evidence of need set out in the Council's Local Housing Need Assessment. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Ms Margaret Brett	Southfields Grid Residents' Association			1412	2.4	<p>Page 10 para 2.4: we support the focus on the specific needs of the elderly and the need to facilitate downsizing.</p>	Comment noted. No impact for the Local Plan	No changes to the Local Plan are considered necessary

Cyril Richert	Clapham Junction Action Group			1654	2.5	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>2.5 page 11</p> <p>There is a strong record of affordable housing provision in the borough with 885 new affordable homes delivered between 2016/17 and 2018/19.</p> <p>This statement should be elaborated, especially on the meaning of "strong record", as according to official figures <u>this is grossly misleading</u>.</p> <p>The London Plan is setting annual targets for London boroughs<sup>21</sup>. As per Wandsworth Core Strategy 2016: "4.189 The SHMA 2012 identified a shortfall of 942 (58 per cent) affordable/social rent units and 686 (42 per cent) intermediate housing units. Given that this is very close to the London Plan 2015 requirement of 60% social/affordable rent and 40% intermediate, the Council will adopt the London Plan requirement."</p> <p>However, for the period 2015/16 to 2019/20, the Council decided that the target should only be nearly the exact opposite: 38% social/affordable rent and 62% intermediate.</p> <p>More importantly, according to the latest Authority Monitoring Report (AMR)<sup>22</sup> figures show that Wandsworth record on providing affordable housing is very weak.</p> <p>For the purpose of demonstration, we have recalculated the completed housing provision by tenure for Nine Elms (VNEB) and the rest of Wandsworth and compared with the current policy target of 15% affordable in VNEB and 33% in the rest of the borough</p> <p>We used conditional formatting to present in red figures missing the targets and in green when it reaches the target and over.</p> <p>Wandsworth has missed 4 times out of 5 its global target of Social/Affordable Rent units for the last 5 years (and every single year if we exclude VNEB) as shown in the tables above.</p> <p>The average net completions on sites <u>outside VNEB</u> with developments of 10 or more dwellings, against Local Plan affordable mix targets, taking into account intermediate, is 25%, considerably below the 33% target<sup>24</sup>.</p> <p>For the whole borough, taking into account VNEB, it is only 20%. We have calculated that, with VNEB lowest percentage, and according to the total completion, it should be around 25%.</p> <p>As those figures are known from the planners<sup>25</sup>, we are surprised they write the opposite in their document.</p> <p>2.5 "strong record of affordable housing provision" is a false statement and should be deleted.</p> <p>You will note that this is a comment we already made in February 2019<sup>26</sup> in our comment 1.0.16 and it appears here that our objection has been ignored.</p>	It should be noted that it is the site that is safeguarded and not the facility.	Amend last sentence of paragraph 2.5 to read: "Affordable housing provision in the borough was 885 new affordable homes delivered between 2016/17 and 2018/19."
Elizabeth Hopkirk				59	2.60	<p>I support the retention and protection of historically and architecturally important social housing estate such as the Alton.</p> <p>I also support the general principle of replacing social housing estates - where they are degrading and the residents support it - (and private gated estates for that matter) with street-based developments of terraced housing and mid-rise mansion blocks.</p>	Support noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				60	2.7	It was great to see Pocket Homes and Metropolitan Workshop's Mapleton Crescent. I support the provision of a relatively small provision of high-quality	The long-term effects of the COVID-19 pandemic on housing market remain unknown. Policy LP29 (now LP27) sets out requirements for housing standards.	No changes to the Local Plan are considered necessary

						<p>smaller-than-space-standards homes where there is demand, to give people choice. However post-covid there may be less demand.</p> <p>There should be an expectation that, say, 80% of the homes in any new development should have a balcony or other outside space.</p>		
Elizabeth Hopkirk			61	2.8	<p>We should avoid building on quality green space by prioritising brownfield, but there may be places where green space is low-quality and is better used for housing. We should be seeking to improve green space in general and adding woods and micro-woods everywhere possible.</p> <p>The quality of new buildings along Upper Richmond Rd East is pretty rubbish. I hope the new NPPF will give you the powers you need to demand far more of the developers and their architects. Why do we not have RIBA-award-winning developments designed by thoughtful architects like they do in many parts of east London and Croydon? We should be developing our own council housing to the highest standards, using design competitions/competitive frameworks.</p>	Comment noted. Policy LP55 (now LP53) seeks to protect the natural environment, and where possible enhance its quality.	No changes to the Local Plan are considered necessary	
Miriam Howitt			112	2.9	Point 2.9 refers to Putney "Health" instead of "Putney Heath".	Comment noted. Amendment made	Amend Health to Heath at 2.9	
Mr Robert Arguile	Chair The Putney Society		281	2.9	Poor residents are clearly related to poor transport = poor opportunities.	Deprivation is a complex issue with various causes. The paragraph does not seek to identify these; rather it reports on deprivation within the borough. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary	
Dr John Fletcher			520	2.9	<p>"Low-income households have lower levels of access to a car than households with higher incomes. Although the level of non-car ownership in the lowest income households has been steadily decreasing over the last 30 years, approximately 40% of the lowest income households still do not have access to a car"</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf</a></p>	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary	
Cllr Loveland	The Labour Group		638	2.9	Paragraph 2.9 identifies the changes in deprivation that have occurred in the borough and how deprivation indices compare with national levels of deprivation. However, the statistics quoted in the Borough Profile in the Health Impact Assessment sets out in stark terms the differences in health and life expectancy between those residents who live in the least deprived areas of the Borough and those who live in the most deprived. We ask that additional text is inserted that recognises that, evident reduction in comparative deprivation notwithstanding, there remains significant levels of deprivation and manifest differences in health and life expectancy	The paragraph highlights the most deprived parts of the Borough. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary	
Laura Hutson	Sport England		136	2.10	<p><b>Economic development</b></p> <p>Sport England wishes to highlight the fact that sport makes a substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.</p>	The economic, social and environmental benefits of sport is recognised across the Plan. For example, the Wandsworth's Riverside Area Strategy recognises the value of water-based sport and promotes investment in it. King George's Park is highlighted as a valuable sporting asset. Providing for Wandsworth's People recognises that sport is a key aspect for meeting need and that sports facilities should be located in accessible places. Policy LP20 established that sports provision can be funded through the Community Infrastructure Levy. Policy LP56 protects sports facilities and promotes new provision. Consequently, there is no amendment to the Plan required.	No changes to the Local Plan are considered necessary	
Mr Robert Arguile	Chair The Putney Society		282	2.11	This shows why local employment should be promoted to tackle overloaded peak hour trains as well as to provide opportunities for all across the borough. Unfortunately most new housing is aimed at this commuting population adding to the imbalance and its contribution to poor air quality.	Housing and economic development policy as presented in Chapters 17 and 18 promote provision to meet local need. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary	
Mr Gavin Chandler			509	2.11	There is an opportunity, heightened by the trends brought about by the Covid restrictions, for the borough to tempt commuters to work more locally. As identified elsewhere, this will require town centre workspace availability and flexible, open and managed workspace availability. Balham is well placed to provide this and the EUPA identified for Irene House (and subject to WBC's Article 4 Direction) would seem ideally located geographically, particularly given the LP's desire on town centre focus, smart growth and a people first approach. It is therefore concerning to see Irene House as potentially being developed as studio accommodation only, despite the Article 4 direction and the areas	<p>Policy LP 37 (Managing Land for Industry and Distribution) protects existing industrial areas within the borough as 'a strategic reservoir of industrial land', within which only industrial and related uses are permissible. The reservoir is formed of the borough's 'Strategic Industrial Locations (SILs)' and 'Locally Significant Industrial Locations (LSIAs)'. Residential development, in particular, is not considered appropriate in these locations. In other locations, like Balham, land is protected as Economic Use Intensification or Protection Areas.</p> <p>The Plan will be monitored through the AMR and Sustainability Appraisal</p>	No changes to the Local Plan are considered necessary.	

						identification as an EUPA (and previously an EPA). The Plan should reinforce that any development in the area has to replicate the office provision floorplate previously there and, if not, detail how Balham town centre will recover this employment opportunity.	indicators. This will allow identification of any issues arising from the implementation of the Plan.  Irene House received prior approval prior to the implementation of the Article 4 Direction. New Article 4 Directions will be considered where necessary.	
	Wandsworth Cycling (London Cycling Campaign)			956	2.11	Opportunity:  2.11 some 25.7% of working residents travel to Westminster and the City of London to work. There is a strong outflow of commuters: of the 179,400 residents in employment, 107,200 leave the borough to work. a net out-commuting flow of 36% 2.27 . more than 400,000 trips per day are considered to be cyclable, with about half of these trips currently being made in private vehicles. There is also scope for many public transport trips to be switched to cycling.	The Plan through Chapter 20 - Sustainable Travel and its Area Strategies promotes active travel. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				62	2.13	I strongly support the aspiration to encourage makers and innovators to base themselves in the borough. Can we ringfence certain light-industrial/brownfield areas so they aren't turned into flats. And can we require commercial mixed-use developments to include some small units for makers and start-ups and new/young businesspeople wanting to test the waters. A supermarket at the bottom of every block of flats does little to animate the street (especially when they lie empty through lack of demand).	Support noted. Policy LP 37 (Managing Land for Industry and Distribution) protects existing industrial areas within the borough as 'a strategic reservoir of industrial land', within which only industrial and related uses are permissible. The reservoir is formed of the borough's 'Strategic Industrial Locations (SILs)' and 'Locally Significant Industrial Locations (LSIAs)'. Residential development, in particular, is not considered appropriate in these locations. In appropriate strategic locations, the Plan permits mixed-use residential and commercial development, where this provides intensified industrial floorspace, including workshops and maker-spaces. These sites are predominantly clustered within Wandsworth and in the Battersea Design and Technology Quarter in Nine Elms, and many are included as site allocations. Please see the relevant Area Strategies for more detail, as well as Policy LP 37 (Mixed Use Development on Economic Land).	No changes to the Local Plan are considered necessary
Miriam Howitt				113	2.13	Point 2.13 highlights the "Demand for further smaller flexible workspaces" which in the existing Alton buildings is easily provided in the ground floor bays, used as storage with set-back black doors. Providing shop fronts instead and services inside is a simple solution already suggested in Roehampton Voice and not taken up.	The Area Strategy for Roehampton aims to create local economic opportunities through the provision of incubator space and revitalised commercial premises to address relative deprivation within the area. The regeneration of the Alton West Estate promotes improved shops and new business floorspace, bringing vitality and vibrancy to the area. Policy PM9 - Roehampton Regeneration Area - establishes that development should provide new job and training opportunities for local people, targeted towards the provision of incubator space to support start-up businesses. The flexible use of these facilities to support different users in the area, including local people and institutional partners, will be encouraged.  Consequently, the Plan provides a robust framework to support workspace/commercial investment and no amendment is required.	No changes to the Local Plan are considered necessary
Dr John Fletcher				521	2.14	I can only comment as an individual at this point and provide no evidence; personally I use Tooting town centre as my main point for shopping and I walk there. Occasionally, I/we cycle to Wandsworth town centre via the Wandle Trail. Occasionally we walk/cycle/get the tube to Balham. Very occasionally we drive to Wandsworth (we have a car, yeah). I look at the demographics and think there must be quite a few people like me.	Comment noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				63	2.15	If we're likely to see commercial uses disappear from the main and sub-centres, can we use planning to encourage shops etc to focus in particular sections of, say, a high street or town centre, to keep the buzz at the centre. Hopefully that would in time encourage other businesses to open in the vacant units at either end.  Please keep on with initiatives like pavement widening, planters, LTNs etc to make areas attractive to pedestrians/potential consumers.	The Government's introduction on 1 September 2020 of the new Class E, which collates previously distinct uses - such as shops, restaurants and offices - within a broader single use ('Commercial, business and service uses') makes it difficult to maintain the currently adopted Local Plan position of requiring that a particular percentage of units within the borough's main shopping streets are shops. The draft Plan therefore seeks to embrace the flexibility for landowners that the new Use Class provides, and no longer sets thresholds. However, it continues to identify key locations within the centres where the Council would prefer to see new shops located in order to maintain a strong retail core. These are identified as the borough's 'Core' and 'Secondary frontages'. Further information is included in Policy LP 45 (Development in Centres).	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			283	2.15	Office jobs should be promoted and all kinds of employment and cultural space in town centres protected to provide the footfall both to reduce commuting and drive revival of the High Streets. The Local Plan needs to address how to counter recent extensions to permitted development which go directly against this. Existing Article 4 Directions may need updating and re-adopting.	Chapter 19 - Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres sets out the policies for the management, growth and adaptation of the borough's centres, in order to ensure that the vitality, vibrancy and uniqueness of each is maintained and strengthened, 19.38 says "It is noted that changes of use between uses within Class E of the UCO do not require planning permission, which limits the scope of this policy's application. Where planning permission is required, the Council may impose conditions to restrict further change of use in the future." This sets out the Council's approach.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary



Ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1001	2.15	<p>Covid-19 recovery Many local authorities are exploring how to reinvigorate town centres and high streets in response to COVID-19 shocks (and Wandsworth's own analysis in paragraph 2.15 anticipates significantly increased vacancy rates). They are developing holistic, sustainable approaches, where combating climate change is joined up with COVID recovery policy. Additionally, the pandemic has increased the need for community support services and similar facilities.</p> <p>3 While the draft Plan's mentions of COVID-19 are welcome, the topic needs much more detailed treatment, given the scale of the issue and the already extensive nature of literature and research on building back better from the pandemic, including from the Mayor of London.1 As such, we expect to see significantly more Wandsworth-specific detail, thinking and implications on this topic in the Regulation 19 iteration of the Local Plan. Elsewhere in England, South Gloucestershire is a good example of a local authority whose new Local Plan is at a very similar stage to Wandsworth's but includes significantly more place-specific commentary on the impact of COVID for planning and place-making.</p> <p>2 Innovative and flexible, not 'business as usual' town centre and retail policy is needed, such as further support for independent/SME retail and hospitality, and meantime/ 'pop-up' uses.</p>	<p>The Local Plan covers post-pandemic considerations across its social, environmental and economic considerations. It embraces the Council's proposed Recovery Plan. It is recognised that there is significant uncertainty as to the impacts. However, the Plan provides a resilient, robust and flexible policy framework to allow appropriate responses. Comment noted. No impact on the Local Plan.</p>	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				64	2.16	<p>Great targets. Can we bring them in sooner?</p>	<p>Support noted. The targets identified in paragraph 2.16 - carbon neutral as an organisation by 2030 and carbon zero by 2050 - are set out within the adopted Wandsworth Environment &amp; Sustainability Strategy (WESS), and the Local Plan therefore takes this forward. Where changes are proposed to targets set within the WESS, the Local Plan will incorporate these.</p>	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			456	2.16	<p>2.16 refers to the Council's Climate Emergency pledge to "work towards" becoming carbon neutral by 2030. It is widely accepted that this will require setting targets for carbon reduction, capture and offsetting significantly over and above the nationally agreed targets. LP10 H makes the commendable commitment that "Retrofitting of existing buildings, through low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported."</p> <p>While we welcome the improvement in setting a carbon offset price per ton which has been increased from £60 to £95, this could go further. Lewisham, for example, currently has a price per ton of £104.</p> <p>Wandsworth's record of collection of carbon offset payments is comparatively poor. To date £2,29m has been secured and £22,300 has been collected while other boroughs have secured much greater amounts (Croydon, £8m secured £450,000 collected; City of London £3m secured £238,000 collected). More robust requirements for collection such as requiring payments at commencement of on-site works rather than prior to first occupation would go a long way towards enabling more proactive use of the carbon offset fund as would setting out principles for the prioritisation of offsetting project types</p>	<p>The Council is committed to tackling climate change and becoming the greenest borough in inner-London. As set out within the Draft Local Plan the Council has a road map which details the actions that will be required to reach the ambitious targets of 2030 and 2050. LP15 sets out that the aim is to reduce carbon emissions on site and it is only in exceptional circumstances that carbon offsetting would be considered. It is preferable to have policies and implement design at the earliest stage to incorporate measures to improve energy conservation and efficiency, as well as contributions to renewable and low carbon energy generation. As development schemes evolve there are often variations to the application and which case updating the offset amount may have to occur. It is therefore preferable to wait until occupation to ensure the correct amount is captured. The amount which has been set for carbon offset payments and was based on the London Plan viability assessment which evidenced that most development types can meet the policy requirements. This figure will be reviewed as part of the AMR and if necessary, can be updated independently of the Local Plan review.</p>	No changes to the Local Plan are considered necessary
Diana McCann	Boroughs Coordinator The Blue Green Economy			1421	2.16	<p>2.16 Climate change and sustainable development - Carbon</p> <p>'Council carbon neutral as an organisation by 2030 and carbon zero by 2050'</p> <p>Carbon neutrality and carbon zero have a primary focus on climate change mitigation with indirect benefits gained many years in the future if global ambitions are met. The gains will primarily relate to a reduction in background air temperatures (separate from urban heat island effect which relate to local surfaces and geometric designs). The key climate change impacts for Wandsworth residents relate to overheating risk (background air temperatures plus urban heat island effect), drought / flood risk and, indirectly through increased air temperatures, poorer air quality (e.g. ozone levels <a href="https://www.sciencedaily.com/releases/2019/07/190723121906.htm">https://www.sciencedaily.com/releases/2019/07/190723121906.htm</a>).</p> <p>The link between carbon / energy and the above climate change impacts needs careful consideration holistically as local solutions can provide multiple benefits / greater value if considered together (meeting Corporate Plan demonstrating 'value for money'). This includes tackling the link between increased Covid deaths and air pollution as part of the wider air quality considerations</p>	<p>Comment noted. The use of the term SUDS is a general term which could already include IWRM or Blue/Green technologies. It is considered that the term SUDS is well understood and is consistent with the wording of the NPPF. The appropriate level of attenuation would be assessed within a detailed Flood Risk Assessment as part of an application. The wording of the policy is considered appropriate, setting out the aim for 100% attenuation. All flood risk measures including the techniques suggested could be included as part of a Flood Risk Assessment and would be considered in the same vein as more traditional techniques.</p>	No changes to the Local Plan are considered necessary

						<p>(<a href="https://airqualitynews.com/2020/10/27/15-of-global-covid-deaths-attributed-to-air-pollution/">https://airqualitynews.com/2020/10/27/15-of-global-covid-deaths-attributed-to-air-pollution/</a>).</p> <p>A comprehensive climate change and sustainable development plan would clarify the difference between mitigation (Paris Agreement Article 2) and adaptation (Article 7). It is only the adaptation elements that can provide the climate change resilience felt by Wandsworth residents immediately and in the Local Plan period as part of any development plans. Integrated Water Resource Management (IWRM) with Blue Green Technologies (BGT) can provide a route to delivering these holistic, highly-gained gains in many areas at risk of negative climate change impacts.</p>		
Elizabeth Hopkirk				65	2.17	I fully support sustainable transport initiatives.	Support noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				66	2.18	<p>I support urgent efforts to reduce pollution and congestion. Be bold! Lead the way! Try things out and stick with them for long enough to see if they work. Be strong! Don't be afraid to make mistakes.</p> <p>Could we turn every 100th parking space into a micro forest? If any houses become derelict as a result of covid-related emigration from the borough, could the council knock it down and create a micro park? There are a few in London that were created after WW2 bombing, and they are glorious (esp. for lockdown mental health).</p>	Policy LP51 - Sustainable Transport recognises the opportunity for parklet provision. Further, such provision is promoted for Wandsworth Town and Clapham Junction. It's associated with the site allocation for St George's Hospital as well. There is no amendment to the Local Plan proposed.	No changes to the Local Plan are considered necessary
Dr John Fletcher				522	2.18	<p>20 years of a plan and the NOx probably still exceeds safe levels:</p> <p><a href="https://www.londonair.org.uk/london/asp/annualmaps.asp?species=NO2&amp;LayerStrength=75&amp;lat=51.43580714366343&amp;lon=-0.15933110066131073&amp;zoom=16">https://www.londonair.org.uk/london/asp/annualmaps.asp?species=NO2&amp;LayerStrength=75&amp;lat=51.43580714366343&amp;lon=-0.15933110066131073&amp;zoom=16</a></p>	The borough has been an Air Quality Management Area since 2001 due to concentrations of pollutants exceeding national air quality standards. As such, any new development and its impact upon air quality must be considered very carefully. The draft Local Plan requires strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. (An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority (GLA).)	No changes to the Local Plan are considered necessary
Diana McCann	Boroughs Coordinator The Blue Green Economy			1422	2.18	<p>2.18 Climate change and sustainable development – Air quality</p> <p>'the Council has produced an Air Quality Action Plan to achieve improvements by reducing polluting emissions through measures such as reducing the need to travel by car, setting out criteria for sustainable design, and promoting sustainable demolition and construction working practices on development sites' The Local Plan does not provide a balanced approach to the management of local air quality beyond 'transportation and construction activities'.</p> <p>This replicates a similar omission in the London Plan and does not relate a requirement to adopt Mayor of London best practice guidance on 'Using Green Infrastructure to protect people from air pollution'. (<a href="https://www.london.gov.uk/sites/default/files/green_infrastruture_air_pollution_may_19.pdf">https://www.london.gov.uk/sites/default/files/green_infrastruture_air_pollution_may_19.pdf</a>).</p> <p>The Local Plan should recognise the likely change in legal status on local air quality following the Ella Adoo-Kissi-Debrah inquest and extend considerations beyond PM2.5 &amp; PM10 (to be measured) to ultrafine particles with their associated health impacts (e.g. Kings College studies on child lung growth driving a school's focus). (<a href="https://www.swlondoner.co.uk/news/18122020-99-of-londoners-breathe-air-that-breaks-world-health-organisation-rules/">https://www.swlondoner.co.uk/news/18122020-99-of-londoners-breathe-air-that-breaks-world-health-organisation-rules/</a> , <a href="https://www.airportwatch.org.uk/2020/01/new-kings-college-study-on-ultrafineparticle-air-pollution-shows-it-spreads-far-into-london/">https://www.airportwatch.org.uk/2020/01/new-kings-college-study-on-ultrafineparticle-air-pollution-shows-it-spreads-far-into-london/</a> )</p>	<p>The Council is committed to improving air quality and ensure that best practise is adopted when working with developers. The Council has prepared a new Air Quality Action Plan Green infrastructure is part of the new AQAP, specifically in sensitive locations such as schools and care homes and can be assessed as part of the individual applications.</p> <p>The AQAP references Ella Adoo Kissi Debrah case and related to air pollution and the move towards PM2.5s.</p>	Wording to be added at 15.74 to read: 'Developments are encouraged to take a holistic air quality positive approach, using multi-faceted means such innovative design solutions, urban greening, and energy master planning and other mitigation strategies to improve air quality in all developments. The Mayor of London's best practise guide 'Using green infrastructure to protect people from air pollution' should be adopted where relevant.
Elizabeth Hopkirk				67	2.19	All new development should be net-zero (embodied as well as operational) asap. Plus encourage retrofit over demolition and new-build.	One of the Council's local plan social objectives is to review poorly performing buildings, including those in the ownership of the Council and other public bodies, and improve them through retrofitting where this is possible. Policy LP 10 also states that: 'The Council will promote and encourage all development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. Retrofitting of existing buildings, through low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported'. The Council's ambition is to be net zero carbon by 2050 as stated in LP10.	No changes to the Local Plan are considered necessary

Mr Robert Arguile	Chair The Putney Society			284	2.19	Fully supported. But there don't seem to be any proposals to deal with this whilst Policies LP1 & LP2 discourage many of the measures needed, e.g.. external insulation, PV panels etc.  <u>Most of the homes that will existing in 2030 or 2050 are already built. Action is by the Council is needed both as landlord and to encourage and support (which is where planning policy applies) upgrading by private owners and other social providers and landlords.</u>	LP10 seeks to retain existing buildings where feasibly. LP10 also requires applications to consider the circular economy hierarchy at the beginning of development.	no changes to the Local Plan are considered necessary
Mrs Sasha Brendon				421	2.19	I welcome the Air Quality Action Plan but feel that more should be done to reduce the need for people to travel by car. Having a huge car park in the centre of Balham does not help.	LP51 Sustainable Transport sets out the Council's position on promoting active travel and LP53 Parking, Servicing and Car Free Development sets out the Council's car parking policy.	No changes to the Local Plan are considered necessary
Diana McCann	Boroughs Coordinator  The Blue Green Economy			1423	2.19	<b>2.19 Climate change and sustainable development - Buildings</b>  'Most carbon emissions come from buildings of an inefficient design and with poor energy performance. To address this, improvements must be made to existing, as well as new buildings, to effectively reduce carbon emissions.'  This limited view relating climate change and sustainable development to carbon emissions, i.e. energy usage, does not address the post-pandemic recovery ambition to include health and wellbeing within sustainable development plans. One key element is for effective ventilation in consideration of energy requirements and reducing airborne infection risk, amongst other things such as improving indoor air quality. 'Effective ventilation' should include a much wider consideration of natural ventilation systems as part of the electric vehicle transition (reduced gaseous pollution levels) with added, wider benefits gained through 'quality passive design'.  Moderation of the thermal and pollution elements of the local environment through blue green solutions can provide an effective way to moderate the energy requirements of buildings and impacts of local poor air quality on opportunities for delivering effective ventilation with reduced need for filtered, mechanical systems.	Comment noted. As set out in the background text of LP10 the plan recognises the impact of ventilation and refers to the need to follow the London Plan's cooling hierarchy S14 which requires developments to provide passive and mechanical ventilation and active cooling systems.	no changes to the Local Plan are considered necessary.
Elizabeth Hopkirk				68	2.21	I fully support this. And good design is about much more than style or aesthetics. Clever use of space, good quality and sustainable materials, good detailing. Designing to foster community spirit and with the environment in mind. All this should be prioritised.	Support noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				69	2.24	Could we start a campaign for a station at Roehampton?  Could we use the rivers for freight and transport?	A campaign for a new station is not within the purview of the Local Plan process. Currently the River Thames is used for the transport of people and freight including aggregates and in particular waste. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Miriam Howitt				114	2.24	Point 2.24 refers to the lack of rail or underground transport services without proposing the solution of extending the Northern Line, which has already been extended to Battersea within Wandsworth Borough. This should be further extended across the borough to serve Clapham, Wandsworth Town, Putney and Roehampton. New stations should be situated away from existing stations of railway lines, preferably in development sites such as Young's Brewery area, to relieve the over-burdened railways and serve different communities. The tube line route should be planned now, so that current developments allow a site for the station, not waiting until the tube line can be built.	There are no plans at the moment for new underground lines to be established within Wandsworth aside from the connection to Nine Elms.	No changes to the Local Plan are considered necessary
Mr Angus Robertson	member Alton Action			549	2.24	The lack of rail or underground transport services for Roehampton and the reliance on bus services is accurate. It should be noted that these bus services are regularly so overcrowded that journeys cannot be taken at all.  There should also be mention of the potential solution of extending the Northern Line, which has already been extended to Battersea within Wandsworth Borough. This could be further extended across the borough to serve Clapham, Wandsworth Town, Putney and Roehampton	Overcrowding on buses is an issue more suitable for the Local Implementation Plan and there are no current plans to extend the Northern Line to Roehampton.	No changes to the Local Plan are considered necessary
Steve Fannon				888	2.24	Correct, "Roehampton in particular dependent on buses for public transport" which is why residents have been concerned for quite some time regarding the growth in population numbers which could make it challenging for residents to both leave and return the ward on a daily basis.	Overcrowding on buses is an issue more suitable for the Local Implementation Plan.	No changes to the Local Plan are considered necessary

						It has been mentioned at the Roehampton Partnership that catching the 85 on the Alton East in the early can be challenging when going to Putney station. Also mentioned at the Roehampton Partnership was the fact that on a working day at about 7am buses were passing residents of Putney Heath as they were at capacity.		
Elizabeth Hopkirk				70	2.26	<p>Bravo! Could a street scooter rental system and more Boris bike docking stations begin to encourage residents to use their car less often (esp. in those long residential streets in West Putney)? Eventually they may decide to ditch their car and use a car club or taxi when they can't cycle/scoot/walk.</p> <p>Making our streets safer and more pleasant for cycling and walking would help (trees, low speed limits/traffic calming, high-quality paving, encouraging interesting independent businesses with attractive frontages, retention and preservation of heritage buildings, high-quality design of new buildings, parklets, protected cycle lanes, wider pavements).</p> <p>More secure bike parking (including for cargo bikes etc) - a cycle hangar in every 20th car parking space, for those of us without anywhere to store a bike. It's no use having them a 10-min walk away!</p>	Comment noted. LP51 Sustainable Transport sets out that developments in Wandsworth will be people focused and be required to meet the healthy streets objectives. LP53 Parking, Servicing, and Car Free Development explains that new developments will be required to provide the London Plan targets for cycle and car parking which seek to restrict car parking in town centres and encourage cycle parking at transport hubs. Para. 20.29 also provides more details as to how cycle docking stations should be provided. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Miriam Howitt				115	2.26	Point 2.26 "Wandsworth's success in reducing car ownership" is fine where there is sufficient local fast public transport to the required destination, but where that is lacking, cars are essential and need sufficient parking. With the congested roads, bus travel takes too long to be viable for most businesspeople. Also there are small businesses which require vans which need parking spaces in their residential areas.	Comments noted. LP53 Parking Servicing and Car Free Development outlines the Council's position for parking.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			285	2.26	There is limited scope for further reductions when families still depend on cars.	Comment noted.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			461	2.26	<p>Strategic Context, Vision and Objectives (transport) 2.26 corresponds to LIP3 para 2.4.31 and addresses Outcome 3 of the London Mayor's Transport Strategy (MTS): London's streets will be used more efficiently and have less traffic on them. 2.26 raises a concern that it is designed to lower expectations and suggests a lack of ambition (possible complacency) about the potential for further reduction in motor vehicle ownership and road traffic levels.</p> <p>2.26 provokes a number of statistical questions, especially given that its assertion of a one third reduction in car ownership since 2001 appears not to be corroborated by day-to-day experience of living/travelling within the borough:</p> <ol style="list-style-type: none"> <li>1. a) Why have the years 2001-2017 been selected (latest available figures are for 2019)? Looking at LIP3 Figure 20, two sharp declines in vehicles registered are evident in 2001-4 (congestion charge introduced in 2003) and 2008-9 (financial crash?). Considering data from 2009-2019 seems more likely to accurately reflect the results of the Council's policy actions.</li> <li>2. b) For comparative purposes, vehicles per head of population represents a more meaningful measure than absolute vehicle numbers, and comparisons should be made with inner London boroughs with similar PTAL ratings. Making these adjustments, data for 2009-2019 shows that the number of vehicles per Wandsworth resident (all ages) dropped from 0.33 to 0.28 (15.2%), compared to other inner London boroughs who saw an average drop from 0.29 to 0.24 (18%).</li> <li>3. c) What does "vehicles licensed in Wandsworth" mean? For example, does it include leased vehicles, which may be registered outside the borough? Presumably this indicator is specified in MTS.</li> </ol> <p>Statistics aside, the fact that vehicle ownership appears to be in decline is welcome. However, we would like to see a commitment in the Local Plan that a continuation of this decline will be actively and energetically pursued, with the aim of meeting, or even exceeding, the 2041 targets set in the MTS. Achievement of the Plan's other laudable objectives depends on it. Our figures, above, indicate that vehicle ownership per head of population is 17% higher in Wandsworth than other inner London boroughs and declining at a slower rate, suggesting that there is more, not less, scope for further reductions in Wandsworth than in other parts of London. Lower vehicle ownership</p>	Paragraph 2.26 celebrates Wandsworth's success in reducing car based travel and seeks to emphasise that these reductions should be encouraged; although they may become more challenging. Comments noted. No impact on the Local Plan	No changes to the Local Plan are considered necessary

						translates into lower traffic levels and more public space that can be reallocated to improve conditions for sustainable transport, environmental enhancements and public enjoyment. In a borough in which 50% of households do not own a vehicle, it is also a matter of equity and fair allocation of public space.		
Dr John Fletcher				523	2.26	So why did you tear out the Tooting low traffic neighbourhoods, and why does your plan only focus on the two main roads through Tooting?	The Council has suspended Low Traffic Neighbourhoods however the implementation and management of Low Traffic Neighbourhoods is not within the remit of the Local Plan. The Local Plan Policies relate to all roads within the borough however the Spatial Area Strategy does focus on the main thoroughfares for Tooting.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1266	2.26	<p>See attachment for representation</p> <p>Dear Sir/Madam,</p> <p>Thank you for the opportunity to respond to the consultation on the Draft Local Plan: Pre-Publication Version.</p> <p>Tooting Healthy Streets is a community group formed in 2019 and made up of residents, families with young children, and people who run local businesses, charities, and other community projects. The group has a vision of active, safe, green and social streets and campaigns for roads that are less dominated by motor traffic, to create a safe and healthy environment for all.</p> <p>This includes walking and cycling being a natural option for local journeys for people of all ages; streets designed to be free from road danger, rat-running and speeding traffic; green streets and public spaces with clean air, trees, planting and wildlife; and opportunities for children to play outdoors and neighbours to be social on the streets.</p> <p>We look forward to having our comments taken into account in the next iteration of the emerging Local Plan.</p> <p>Yours faithfully</p> <p>Riccardo Composto</p> <p>On behalf of Tooting Healthy Streets</p> <p>tootingstreets@gmail.com</p> <p><b>Comments on 2 Strategic Context, Vision and Objectives</b></p> <p><i>2.26 'Wandsworth has already seen the biggest drop in vehicles of any of the 32 London boroughs, with 33% fewer vehicles licensed in Wandsworth in 2017 than there were in 2001...Wandsworth's success in reducing car ownership and road traffic levels is particularly remarkable given it has come against a backdrop of the overall growth in residents in the borough, over the same timeframe.'</i></p> <p>The car ownership claim is evidenced but the reduction in road traffic levels is not and it does not match DfT statistics for the borough which shows traffic levels on the rise from a low in 2013. This should be made clear to avoid complacency on this problem. The reduction in car ownership is extraordinary, particularly in light of an increasing population and it should give policy- and decision-makers confidence in embarking on ambitious measures to tackle the problems of road transport within the borough. We do also question whether the trend towards higher levels of vehicle leasing may be making these statistics look better than they are, as a leased vehicle is registered by the finance house, which may well not be in Wandsworth. We suggest that results of the 2021 Census are used to sense-check these figures and track the change in household car ownership since 2011.</p>	The census data will not be available in time to make changes to the Local Plan.	The paragraph has been amended to clarify that traffic levels have started to rise again.
Elizabeth Hopkirk				71	2.27	Bravo on that vehicle drop (2.26) and the increase in cycling! I reiterate my comments in 2.26: we need to slow cars down on side roads like mine where they zoom past/at you aggressively. We need cycle contraflows and priority at lights. We need protected cycle lanes that join up well as junctions so kids and	Comment noted. LP51 Sustainable Transport sets out that developments in Wandsworth will be people focused and be required to meet the healthy streets objectives. LP53 Parking, Servicing, and Car Free Development explains that new developments will be required to provide the London Plan targets for cycle and car parking which seek to restrict car parking in town centres and encourage	No changes to the Local Plan are considered necessary

						grandads can use them. Let's have less street parking for cars and more for bike parking/trees/parklets/planters.	cycle parking at transport hubs. No changes to the Local Plan are considered necessary.	
Mrs Sasha Brendon				422	2.27	If there has been such a drop in vehicle ownership within Wandsworth, why are we still pandering to drivers choosing to drive their vehicles through the borough on route to other places? Every morning Dr Johnson Avenue and Elmbourne Road are packed with vans travelling in from Surrey and even further afield, all on route into London. This should not be allowed to happen.	While the Local Plan includes an objective to reduce all journeys there must be options for individuals who have no choice other than to drive. Transport Planners in the borough will examine areas with unacceptable congestion and propose changes, however, this is out with the Local Plan.	No changes to the Local Plan are considered necessary
Mrs Sasha Brendon				423	2.27	If there has been such a drop in vehicle ownership within Wandsworth, why are we still pandering to drivers choosing to drive their vehicles through the borough on route to other places? Every morning Dr Johnson Avenue and Elmbourne Road are packed with vans travelling in from Surrey and even further afield, all on route into London. This should not be allowed to happen.	While the Local Plan includes an objective to reduce all journeys there must be options for individuals who have no choice other than to drive. Transport Planners in the borough will examine areas with unacceptable congestion and propose changes, however, this is out with the Local Plan.	No changes to the Local Plan are considered necessary
Dr John Fletcher				525	2.27	Nationally the Dutch have a modal share of 26% (2017 figures). Could we not be a bit more bold?  <a href="https://www.sciencedirect.com/science/article/pii/S0925753515001472">https://www.sciencedirect.com/science/article/pii/S0925753515001472</a>	The targets set for Wandsworth consider the existing conditions of the borough and are considered achievable and realistic.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1267	2.27	See attachment for representation  <b>2.27</b>  We request that the kilometres of existing cycle lane that meet current DfT and TfL quality and design standards are noted here so that they can be compared against the figure of 440km of roads from 2.22. This will be useful benchmarking from which the construction of a cycle network can be measured. The WBC transport planning team is currently working on a cycling audit that could be used to determine this.	The Council does not have this type of information readily available.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				72	2.28	Good work, but let's create more walking and cycling routes that aren't beside highways. Plus better signs. Please continue to allow careful cycling on towpaths and in parks.	Comments noted. The Spatial Area Strategies and the Overarching Spatial Area Strategies highlight many of the potential new walking and cycling routes for the borough. No changes to the Local Plan are considered.	No changes to the Local Plan are considered necessary
Miriam Howitt				116	2.31	Point 2.31 proposes more homes "particularly for those on lower incomes" which is vital. This depends on a realistic assessment of "lower incomes" which was not the case in Redrow's scheme for Alton Estate. Developers require to make a profit for their investors, therefore should not be given the free site of a Council Estate to make money on dwellings which are unaffordable by the local people.	Comment noted.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1268	2.31	See attachment for representation  <b>2.31</b>  We broadly support the objectives that relate to Healthy Streets outcomes (Cleaner, safer, better neighbourhoods and Encouraging people to live healthy, fulfilled and independent lives) in line with London Plan policy T2 Healthy Streets. However the reference to 'keeping them green, clean and safe' suggests that this is already the case. Large areas of Tooting are not green (as evidenced by the 2007 Open Space Study), clean (significant problems with street litter and fly tipping) or safe (there are problems of personal and road safety) and we propose a more suitable form of words would be 'ensuring they are green, clean and safe'	The existing wording is not intended to be purely focused on the present but on the future over the entire plan period and it relates to the entirety of the borough.	No changes to the Local Plan are considered necessary
Cyril Richert	Clapham Junction Action Group			1656	2.31	<b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b>  2.31 Corporate Plan and Objectives  The Corporate Business Plan reflects resident priorities, as well as significant policy developments or commitments of the Council. The six strategic objectives in the Plan reflect the Council's priorities  In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we already highlighted the propensity to confound the aspirations of the local community and the choices made by the Council. Speculation over resident priorities should be refrained. We asked not to write	Comment noted. The wording of the Corporate Business Plan has already been agreed by the Council.	No changes to the Local Plan are considered necessary

						<p>"local community" while actually meaning "Council". The comment was "noted" 27, but unfortunately ignored here.</p> <p>In addition, there was no mention of "Corporate Plan" in previous versions of the Local Plan (Core Strategy 2016) and the current listing look like a political pledge of the political party holding the majority of seats on the Council.</p> <p>2.31 Proposed wording: "The Corporate Business Plan reflects resident priorities, as well as significant policy developments or commitments of the Council."</p>		
Cyril Richert	Clapham Junction Action Group			1658	2.33	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>2.33-2.34 page 16</p> <p>Refer to previous comment 1.9 on Smart Growth.</p> <p>If the planners want to refer to Smart Growth however, we suggest the following definition as found in some US documentation:</p> <p>"Smart Growth (also called New Urbanism) refers to various policies and planning practices that create more compact and multimodal communities, in contrast to sprawl, which results in more dispersed and automobile-dependent development."</p> <p>It must be noted that the concept of Smart Growth has received a number of criticisms 28, which should not be ignored. For example, it is acknowledged in the US that it is difficult to quantify some Smart Growth benefits, such as the value communities place on greenspace preservation and improved transportation options for non-drivers.</p> <p>2.33-2.34 page 19</p> <p>By 2038 Wandsworth borough will have maintained its special character,</p> <p>We want to see a definition of "special character". Is transforming an area of low rise building into a cluster of tall towers a definition of maintaining its special character? The Planners need to elaborate.</p> <p>2.33 Need a definition of "special character"</p> <p>In addition, this seems in contradiction (or it needs to be detailed) of the later statement in 3.23 where it says that "areas are considered appropriate for their character to change or evolve, which will be assisted by the targeted Area Strategies."</p>	<p>Comment noted. Amend first two sentences of paragraph 2.31 to read: "Through the Corporate Business Plan the Council has six strategic objectives that reflect the Council's priorities and its ongoing corporate ambition to deliver high quality, value for money services as follows:"</p> <p>Replace "Cleaner" with "Greener" at second bullet of paragraph 2.31.</p>	<p>Amend first two sentences of paragraph 2.31 to read: "Through the Corporate Business Plan the Council has six strategic objectives that reflect the Council's priorities and its ongoing corporate ambition to deliver high quality, value for money services as follows:"</p> <p>Replace "Cleaner" with "Greener" at second bullet of paragraph 2.31.</p>
Mr Robert Arguile	Chair The Putney Society			287	2.34	<p>2.34 <i>The Council's Smart Growth programme has five overarching objectives:</i></p> <ul style="list-style-type: none"> <li>To be the greenest inner London borough.</li> </ul> <p>this target must be zero carbon as well as literal greenery. Redraft this to say so.</p> <ul style="list-style-type: none"> <li>To deliver the best start in life.</li> </ul> <p>More new housing should be family sized.</p> <ul style="list-style-type: none"> <li>To promote aspiration for everyone through sustainable, ambitious growth and regeneration.</li> <li>See the comments against 2.11 above.</li> </ul> <p>growth in employment space must outstrip growth in the number of homes to offset excessive commuting and offer employment to the widest range of residents.</p>	<p>Housing and economic development policy as presented in Chapters 17 and 18 promote provision to meet local need. Comment noted. No impact on the Local Plan.</p> <p>The term "Smart Growth" at paragraph 1.9 is used in reference to the Recovery Plan in response to the Covid-19 pandemic. Smart Growth – Wandsworth's Recovery Plan was reported to Finance and Corporate Resources Overview and Scrutiny Committee – 2 July 2020 and Executive – 6 July 2020. Since then, the Council has moved away from the term, and the Local Plan will instead use, 'Inclusive Growth'. This fits with the National Planning Policy Framework, where there is a reference to the 2030 UN Agenda for Sustainable Development, in which Global Goal 8 talks about promoting sustained, inclusive and sustainable economic growth. The five overarching objectives are part of this corporate strategy.</p>	<p>No changes to the Local Plan are considered necessary</p>

						<ul style="list-style-type: none"> <li>To ensure businesses thrive and town centres are vibrant and culturally rich places to go, shop and enjoy. See the comments against 2.11 above.</li> </ul> <p>Enabling people to get on in life.</p>		
Ms Margaret Brett	Southfields Grid Residents' Association			1411	2.34	Page 16 para 2.34: we think this should include local centres as well as town centres.	Comment noted. The Local Plan takes account of the Recovery Plan by addressing its objectives through the spatial vision. The Local Plan provides direction for the town centres - which are the principal centres in the borough - alongside giving similar protection to other centres in the hierarchy.	No changes to the Local Plan are considered necessary
Ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1000	2.35	Climate emergency declaration The Forum strongly welcomes the Council's 2019 Climate Emergency Declaration and welcomes in principle the Wandsworth Environment and Sustainability Strategy (WESS) that seeks to put it into effect. Policy-makers and the general public realise that climate emergency declarations, like that made by the Council in 2019, are meaningless without detailed backup work to implement them into policy. As such, the Local Plan represents a gilt-edged opportunity to implement the climate emergency declaration and WESS into policy for the use and development of land. However, while the Forum welcomes the WESS, it is strange (and unhelpful) that the WESS does not itself refer to the Climate Emergency declaration at any point. More significantly, the WESS is mentioned in detail in only two places in the emerging Local Plan- in the introduction to all relevant Council strategies (2.35 to 2.40) and the cross-cutting Chapter 15 (Tackling Climate Change). This is not appropriate given that the Climate Emergency Declaration and the WESS represent (or should represent) a fundamental and meaningful change in the use and development of land. The plan as drafted represents an approach to climate change little different from the treatment of climate change in previous recent local plans, but the whole point of declaring an 'emergency' is that change should be urgent, radical and clear across the plan as a whole, rather than a 'business as usual' approach to the topic. Indeed, the need to avoid 'business as usual' was acknowledged by the Council itself in the Finance, Resources and Climate Sustainability Overview and Scrutiny Committee that we attended on 22nd January 2020. As such, the WESS should directly inform and be cited appropriately throughout all the Plan's land use policies, including for specific locations such as Tooting. Without an approach embedding the WESS within all relevant policy, Plan users and the local community will not have the confidence that the Council has the ambition to implement the Emergency declaration or understands fully how the declaration, though strategic in nature, should flow effectively into specific land use interventions. If, as currently, the only policy chapter informed in detail by the WESS is Climate Change, the Council is signalling (even if inadvertently) that the Climate Emergency Declaration and the WESS are not much different from the many previous iterations of climate change policy in Wandsworth over the last twenty or so years. Throughout our detailed comments on the Tooting Area Strategy below we point to some specific ideas and opportunities currently missing from land use policies that if amended, would help make the Council's climate emergency declaration more meaningful, compelling and deliverable. Though our comments relate, as they should, mainly to the Tooting Area Strategy, they should be readily translatable to other Area Strategies, appropriately adopted.	The Council is committed to tackling climate change and becoming the greenest borough in inner-London. As set out within the Draft Local Plan the Council has a road map which details the actions that will be required to reach the ambitious targets of 2030 and 2050. The WESS will play a key role in delivering these actions along with the Local Plan. The aim is for zero carbon by 2030 and having an interim target may confuse and also in some cases do not push developers to achieve higher standards if an interim target exists. Whilst the Local Plan is set out for 15 years it is also reviewed every 5 years. In addition the Local Plan includes monitoring indicators which are reviewed every year to see the performance of the plan.	no changes to the Local Plan are considered necessary
Dr John Fletcher				526	2.36	see 2.18 & 2.26	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Miriam Howitt				117	2.37	Points 2.37-2.40 Wandsworth's Environmental and Sustainability Strategy (WESS) is excellent theoretically but relies on interpretation in action.	Comment noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				73	2.39	Those should be targets for the whole borough, not just the organisation!	See response to comment 64 on paragraph 2.16.	No changes to the Local Plan are considered necessary
Mrs Sasha Brendon				424	2.39	Please provide recycling bins on commons/parks and in streets.	Improvements such as this will come forward through a variety of means including planning conditions and LP20 New Open Space.	No changes to the Local Plan are considered necessary



Elizabeth Hopkirk				74	2.40	I broadly support these aims.	Support noted.	No changes to the Local Plan are considered necessary
Paul Dolan				515	2.40	To cut emissions we must cut the new build within Wandsworth. Repurpose empty property, keep Wandsworth low rise. Promote maintenance of existing Victorian housing stock and therefore value of homes to enable investment into insulation and microgeneration via PV or solar thermal as well as promoting heating via direct sunlight into homes. New build is not the way a conservation approach to the existing housing stock occupied by the many will produce better use of investment and planning. Unless we promote microgeneration in homes the electric network will not support the planned grid for electric car charging. TFL have carried out research on this matter and the physical network of wires is not able to meet the demand for electricity even by smart charging and Vehicle to Grid balancing.	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary.
Dr John Fletcher				527	2.40	"improving the borough's air quality, with actions on transport, planning and development all contributing to improving air quality, including tackling pollution and emissions from engine-idling;" Specifically on engine idling, what can you practically do? I agree 100% with you, for what little it is worth.	Paragraph 2.40 reports on the WESS. Comment noted. Delete "including tackling pollution and emissions from engine-idling"	Delete "including tackling pollution and emissions from engine-idling"
Ms Bridget Fox	Regional External Affairs Officer (South East) The Woodland Trust			594	2.40	The Woodland Trust welcomes the priority given in the local plan to the Wandsworth Environment Strategy and to the borough's commitment to being carbon neutral by 2030, including urban greening, planting trees, encouraging biodiversity, and protecting and enhancing parks and open and green spaces.  We particularly welcome policy in support of new tree planting and woodland creation. A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change, to provide a key mechanism to lock up carbon in trees and soils, provide an alternative to fossil fuel energy and resource-hungry building material, and importantly to stem the declines in biodiversity.  We recommend setting a borough-wide target for tree canopy cover as part of this policy. We further recommend adding that a target tree canopy cover of 30 per cent on development sites will be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.	The WESS outlines that Wandsworth will prepare a new Tree Strategy which will sit alongside the Biodiversity Strategy provide a clear long-term approach on tree planting policy and the management and support required to deliver the ambitions of the WESS. Not only will this outline the many benefits associated with trees, including environmental, health, wellbeing and economic, but it will also inform future contract specifications and requirements. The extensive tree planting programme will continue with a further 600 trees planted by April 2022 and the completion of the ambition (outlined at this Committee last year) to plant 1,000 new street trees. New trees will be helped to become established and take root through the use of 750 tree gators installed on all new trees planted across the borough	No changes to the Local Plan are considered necessary.
Riccardo Composto	Tooting Healthy Streets			1269	2.40	See attachment for representation  <b>2.40</b>  This section misses any reference to active travel which forms a key part of the sustainable transport pillar of the WESS. In particular the adoption of the sustainable transport hierarchy merits inclusion here, as does the objective that 'Wandsworth will be an easy place to use, own and store a bicycle'. London Plan Policy T5 Cycling provides relevant guidance.	Paragraph 2.40 reports on the specific areas of action identified by the WESS. Comments noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Diana McCann	Boroughs Coordinator  The Blue Green Economy			1424	2.40	<b>2.40 Wandsworth Environment and Sustainability Strategy (WESS)</b>  In addition to the multi-benefits that Integrated Water Resource Management (IWRM) with blue green technologies (BGT) can generate supporting health and wellbeing, tree / vegetation planting should have a strategy developed which includes reduction of plastics pollution within our water courses. For example, a well-designed tree pit, e.g. supported by rainwater runoff from the streets, could lead to a microplastic removal rate of in excess of 95% protecting the Thames and, ultimately, our oceans. <a href="https://greenblue.com/gb/utilizing-suds-lid-tree-pits-for-micoplastic-filtration/">https://greenblue.com/gb/utilizing-suds-lid-tree-pits-for-micoplastic-filtration/</a> .	Comment noted. The use of the term SUDS is a general term which could already include IWRM or Blue/Green technologies. It is considered that the term SUDS is well understood and is consistent with the wording of the NPPF. The appropriate level of attenuation would be assessed within a detailed Flood Risk Assessment as part of an application. The wording of the policy is considered appropriate, setting out the aim for 100% attenuation. All flood risk measures including the techniques suggested could be included as part of a Flood Risk Assessment and would be considered in the same vein as more traditional techniques.	no changes to the Local Plan are considered necessary
Miriam Howitt				119	2.42	Point 2.42 Wandsworth is justly "proud of our Council Housing" then proposes to demolish the ten typical blocks in the centre of the internationally acclaimed parkland Alton Council Estate which the Council has neglected. All over the Estate identical blocks have been renovated and are prized homes.	Comment noted. The masterplan to regenerate the Alton Estate has been approved by Wandsworth Council's Planning Applications Committee on Thursday 22 October 2020. The Alton will deliver well-designed homes for existing and new residents, two new community centres, public realm improvements and a better connected estate with improved links and pedestrian and cycle routes. The mixed-use regeneration scheme will deliver more than 1,100 new homes including 261 Council homes - an increase of 103 Council homes.	No changes to the Local Plan are considered necessary

Mr Robert Arguile	Chair The Putney Society			288	2.42	<p>2.42 The Strategy focusses on five key themes, each of which plays an integral part in providing housing for the borough:</p> <ul style="list-style-type: none"> <li>· Building more homes</li> <li>· Proud of our council housing</li> <li>· Improving standards for private renters</li> <li>· <u>Tackling homelessness and rough sleeping</u></li> <li>· Supporting vulnerable residents</li> </ul> <p>The Council acknowledges in its 'Housing Offer for Wandsworth People, 2019' (Theme Four) that 'homelessness' and 'rough sleeping' incorporate a broad range of issues for individuals, often going way beyond lack of a permanent home. Lack of employment, release from prison, physical and mental health issues, drug and alcohol problems, among others, all contribute. Whilst providing more new homes is an essential part of the solution, many people need a range of services, longer term interventions and support to avoid becoming rough sleepers.</p> <p>We seek reassurance that the council will continue its work with rough sleepers across the borough, and particularly in and around Putney High Street, of whom there are several regulars. In particular, we seek confirmation that partnerships with relevant agencies will be strengthened, that sufficient resources to provide holistic services will continue to be allocated across the entire borough, and that the Council will continue to chair the regular multi-agency rough sleeper forums.</p>	Comment Noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Ms Margaret Brett	Southfields Grid Residents' Association			1410	2.42	Page 17 para 2.42: we take the view that being 'proud' is not a measurable action.	Comment Noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1491	2.45	We support the references in the vision(pages 20-21) to health and wellbeing and working with key partners, such as the NHS to invest in public services to support healthy lifestyles (13th and 19th bullet points). However, the vision could be more succinct by reflecting the overall aim to improve the health and wellbeing of the local population and reduce inequalities. The planning system has an important role to help to deliver the aims of the Wandsworth Health and Care Plan to prevent ill health by addressing the wider determinants of health and to support the integration of services.	<p>Amongst other things, the Plan's vision states: "We will have significantly invested in public services throughout the borough to enhance our social, health, education, digital, transport and public realm infrastructure which supports wellbeing needs and are inclusive and accessible to all."</p> <p>Comment noted. No impact on the Local Plan.</p>	No changes to the Local Plan are considered necessary
Miriam Howitt				120	2.47	Point 2.47 (add) the provision of facilities for healthy physical activities such as sport, swimming and gymnastics	The Local Plan cannot change the existing Joint Health and Wellbeing Strategy's vision.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			289	2.47	<p>The Joint Health and Wellbeing Strategy includes the following aims:</p> <p><i>'By 2038' p20 Social integration, supporting social mobility and enabling all of the borough's residents to achieve their potential will be at the heart of everything we do.</i></p> <p>To achieve this by 2038 these aims need to be at the heart of everything now.</p> <p><i>Being Inclusive (p24): by prioritising the creation of resilient and <u>connected communities</u> and <u>accessible centres</u> that promote the use of sustainable travel and which are people-centric – the Council's People First ambition.</i></p> <p>The Local Plan does not of itself provide transport. Please say how this is achieved.</p>	The Area Strategies and broader policy framework (particularly for sustainable transport and town centres) establishes an approach to develop inclusive, healthy communities. Comments noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1270	2.47	<p>See attachment for representation</p> <p><b>2.47</b></p>	<p>Paragraph 2.49 establishes that the Health and Care Plan highlights creating environments where the healthier choice is the easier choice. This provides a context for the Local Plan in promoting health and well-being.</p> <p>Comment noted. No impact on the Local Plan.</p>	No changes to the Local Plan are considered necessary

						The NHS Long Term Plan has a significant role for Social Prescribing, for which active travel can be an enabler. This could be referenced in this section, making a connection between Health and Wellbeing and improvements to be delivered by the WESS, LIP and Walking and Cycling Strategy plans.		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1487	2.49	Strategic Context and Vision  Paragraph 2.49 refers to the NHS London Healthy Urban Development Unit (HUDU) Planning Obligations Model and an estimate of the total capital cost of providing additional health infrastructure capacity over the plan period. We note that the latest published Infrastructure Delivery Schedule (IDP) is dated 2016 and we would welcome the opportunity to update the IDP.	Comment Noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1490	2.51	Paragraph 2.51 refers to primary care networks. It would be helpful if reference was made to other health and care organisations, including the NHS Trusts and their role in providing acute, community and mental healthcare services and plans to transform services.	Mention is made of the NHS in para 2.49, alongside other health providers in the section from para 2.47. References are also made in the People First section from para 2.98.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				75	2.52	Great!	Support noted.	No changes to the Local Plan are considered necessary
Miriam Howitt				121	2.54	Point 2.54 "provision of arts and culture" infrastructure are fine words, but Wandsworth Council demolished the original Adult Education Centre in the heart of the Alton Estate which excellently fulfilled this purpose, to build Cleeve Way housing. Manresa provided the facility for several years then became a college of Roehampton University with no community access.	Comment noted.	No changes to the Local Plan are considered necessary
Miriam Howitt				122	2.58	Point 2.58 expresses lots of good intentions which the Redrow scheme for the centre of Alton Estate does not fulfil, yet the Council persists in trying to carry out. The loss of both B&Q and Homebase in Wandsworth centre (providing essential materials for householder's homes and gardens) is deplored. This will result in countless car journeys to their remoter stores.	Comment noted. The masterplan to regenerate the Alton Estate has been approved by Wandsworth Council's Planning Applications Committee on Thursday 22 October 2020. The Alton will deliver well-designed homes for existing and new residents, two new community centres, public realm improvements and a better connected estate with improved links and pedestrian and cycle routes. The mixed-use regeneration scheme will deliver more than 1,100 new homes including 261 Council homes - an increase of 103 Council homes.	No changes to the Local Plan are considered necessary
Jane Aliband				53	2.59	I have looked at the Local Plan Review; and I think the Placemaking, Smart Growth and People First is a great approach to take.	Support Noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				78	2.60	Great - but let's see this section with some proper targets and not just 'working towards'.  I support pro-active planning.  Stick to your guns as we enter recession and demand the very highest standards from developers rather than gratefully welcoming any investment.	Support noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				79	2.62	Great!	Support noted.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				80	2.64	Great - but I'd include the health of wildlife too which has such an impact on people's wellbeing.	Comment noted. Policy LP57 - Biodiversity protects and, where appropriate, secure the enhancement of the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites. It establishes that development proposals will be required to protect and enhance biodiversity. Development which would have an adverse impact on priority species or priority habitat(s) will only be permitted where it can be shown that the proposal cannot be redesigned, benefits would outweigh harm and mitigation can be applied. Consequently, the Plan adequately addresses the point raised.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			462	2.69	2.69 - We strongly support the aim to reduce vehicle dependency and promote mode shift to sustainable modes of transport.	Support Noted	No changes to the Local Plan are considered necessary
Dr John				528	2.69	I agree entirely with you.	Support Noted	No changes to the Local Plan are considered necessary

Fletcher								
Susie Morrow	Chair Wandsworth Living Streets			665	2.69	2.69 Traffic and Public Transport – this should probably say “2.69 Motor Vehicles and Public Transport”, given that (motor) traffic is a consequence of the use of the transport mode	The proposed change doesn't provide any greater clarity to the paragraphs that follow. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1272	2.69	See attachment for representation  <b>2.69</b>  The reference to 'perceived road safety grounds' suggests that these grounds are unfounded. Tooting has an appalling road casualty record (evidenced below under 8.6 and accessible to WBC through TfL's Surface Playbook or the public via the Road Danger Reduction Dashboard) and other parts of the borough may be similar. We suggest the word 'perceived' is not used here. We also would like to note that 'road safety' has become an out of date concept and the term 'road danger' reflects current thinking on tackling danger at its source (e.g. the 'fatal five' behaviours of dangerous motorists) rather than applying safety treatments to accommodate dangerous behaviours. This is the wording used throughout the London Plan and we hope Wandsworth will recognise and adopt this concept as well.	Comment Noted. Delete " on perceived road safety grounds" from paragraph 2.69.  Amend Appendix 4 - Glossary to update TA/ Transport Assessment definition	Delete " on perceived road safety grounds" from paragraph 2.69.  In Appendix 4 - Glossary update TA/ Transport Assessment definition to delete "improve road safety" and replace with "reduce road danger"
Elizabeth Hopkirk				81	2.70	Could we encourage last-mile delivery by cargo bikes and smaller vans? It's crazy to let giant Tesco vans block high streets just because it saves Tesco money to use big vans.	Policies PM2, PM3, PM4, PM5 and PM9 support the provision of Urban Logistics Hubs for last mile deliveries by cargo bikes.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			463	2.70	Para 2.70 outlines the challenge of managing competing demands for limited street space. It states that, "Imaginative responses to these challenges that use the highway more equitably, recognising the priority hierarchy for movement, will be required." We would argue that the policies (LP51-LP54) are insufficiently imaginative in addressing the challenge of competing demands. This is predominantly because of a reluctance to tackle the existing problem of car dominance head-on, as indicated in 2.26. should emphasis walking as high priority and personal vehicles as low priority – this may mean restricting the speed of vehicles, both through speed restrictions and as a consequence of reduced road capacity.	LP51 Sustainable Transport does include reference to parklets and it is left to applicants to propose imaginative responses to these challenges.	No changes to the Local Plan are considered necessary
Dr John Fletcher				529	2.70	I agree entirelyly with you.	Support noted.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1273	2.70	See attachment for representation  <b>2.70</b>  The reference to 'recognising the priority hierarchy for movement' is unclear. Does this refer to the sustainable transport hierarchy in the WESS or something else? It would be helpful to clarify the reference. We suggest a strategic plan should be included for how WBC intends to solve the issues of competing demands laid out in this paragraph.	Comment noted. Change paragraph 2.70 to clarify reference	Change "priority hierarchy for movement" to "sustainable transport hierarchy" in paragraph 2.70.
Sasha Brendon				425	2.71	Priority should be given to pedestrians and cyclists. Our roads should not be given over to an ever-increasing number of cars/vans/lorries.	Paragraph 2.17 focuses on issues pertaining to public transport. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Michael Atkins	Senior Planning Officer Port of London Authority			1445	2.71	<b>See the attachment on comment 1441 the representation for context</b>  <b>Spatial Strategy</b>  Support the reference in paragraph 2.71 under the traffic and transport heading that there is scope for enhancements to existing riverbus services to support the growing population in riverside developments and that the river is also used for some freight transport, notably the transport of waste. However it is considered that more could be made in this section of the potential of these sites to significantly help to meet the boroughs aims to deliver modal shift from vehicular use to more sustainable forms of transport, for both passengers, small scale freight and bulk materials via the River Thames. The Local Plan must	Comment noted.	The paragraph will be amended to identify that scope for enhancements to existing riverbus services exists and the introduction of new ones to support the growing population in riverside developments would be supported.

					<p>encourage the maximisation of use of these facilities as part of the overall effective management of traffic and improving transport connectivity within the borough as a whole. As road freight is a major contributor of CO2 emissions, waterways must be considered as part of the solution to reduce dependency on the road network for the transportation of construction materials, freight and waste. This is supported by a number of policies and associated guidance at national, regional and local levels, specifically within the National Planning Policy Framework (2018) (NPPF) where support for such facilities is included in paragraph 204(e) stating that:</p> <p>“planning policies should safeguarded existing sites for the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate materials.”</p> <p>At a regional level section 41 of the Greater London Authority Act (1999) places duties on the Mayor with regard to the strategies the Mayor produces, such as the Mayor’s Transport strategy or the London Plan and specifically includes as one of the matters that must be considered is for the “desirability of promoting and encouraging the use of the River Thames safely, in particular for the provision of passenger transport services and for the transportation of freight.”</p> <p>There are then a number of policies contained within both the current and emerging London Plan, and the Mayors Transport Strategy (2018) for the use of the River Thames, including:</p> <p>Current London Plan (2016):</p> <ul style="list-style-type: none"> <li>- Policy 5.20 Aggregates</li> <li>- Policy 6.14 Freight</li> <li>- Policy 7.26 Increasing the use of the Blue Ribbon Network for freight transport</li> <li>- Policy 5.17 Waste capacity</li> <li>- Policy 5.18 Construction, excavation and demolition waste</li> <li>- Policy 7.24 Blue Ribbon Network</li> </ul> <p>Emerging London Plan (2019):</p> <ul style="list-style-type: none"> <li>- Policy E4 Land for industry, logistics and services to support London’s economic growth</li> <li>- Policy E5 Strategic Industrial Locations (SIL)</li> <li>- Policy SI8 Waste capacity and net waste self sufficiency</li> <li>- Policy SI10 Aggregates</li> <li>- Policy SI15 Water transport</li> <li>- Policy T2 Healthy streets</li> <li>- Policy T7 Freight and servicing</li> </ul> <p>The Mayors Transport strategy also contains a specific proposal (16) which seeks to increase the proportion of freight moved on London’s Waterways.</p> <p>With regard to riverbus services specifically, whilst paragraphs 2.71 and 11.10 of the Local Plan state that there is scope for enhancements to existing riverbus services to support the growing population in riverside developments, and policy LP60 (river corridors) supports new and enhanced infrastructure,</p>	
--	--	--	--	--	---	--

						including piers for river bus services, it is considered that more support should be provided in the Local Plan on the role existing and/or new riverbus services can play as part of the delivery of small scale freight ('last mile' delivery). This would align with the recent Mayors Transport Strategy (2018) which, under policy 17 states that the Mayor will seek the use of the full potential of the Thames to enable the transfer of freight from road to river in the interests of reducing traffic levels and the creation of Healthy Streets as well as associated London Plan policies. Given the scale of the proposed future development in the borough, particularly adjacent to the boroughs waterways, the use of alternative and innovative delivery and servicing practices that could use the boroughs waterways must be referenced and promoted in the Local Plan.		
Elizabeth Hopkirk				82	2.72	As well as protecting and enhancing our 'official' open spaces can we also start looking for opportunities to create micro-parks and micro-forests? Lockdown showed us the value of having very close access to trees and nature - 2 mins' walk not just a Heath or Common 20 mins away.	LP59 Urban Greening Factor will require all new developments to provide a quantum of green infrastructure which will increase the overall spread of green features across the borough. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Diana McCann	Boroughs Coordinator  The Blue Green Economy			1425	2.72	<b>Spatial Vision and Strategic Objectives – Social objectives</b>  Addressing social inequality through reduction in local urban heat island effect and poor local outdoor air quality.  <b>2.72 Open space</b>  The Local Plan should recognise that, although there are many stated benefits of open space to health and wellbeing, these benefits diminish quickly with distance from the open space and therefore time spent in these environments as well. In order to gain these benefits for much greater amounts of time as we spend time in our homes and workplaces, it is necessary to moderate the local environment away from open spaces as well. Blue green technologies integrated into our urban fabric away from open spaces provide an approach that can generate these benefits.	Paragraph 2.72 highlights urban greening as a contributor to "an integrated and connected network of green and blue infrastructure."  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				83	2.73	As well as protecting the buildings, we should protect historic form in terms of alleyways, ginnels, runs of narrow facades - fine urban grain. Too often a little terrace of run-down shops is replaced by one giant building. This is a tragic and irretrievable loss.	Comments noted. Policy LP8 requires that proposals retain shopfronts of architectural or historic interest or any features of interest that survive on the premises (including historic shop signage), particularly where these make a positive contribution to the distinctive visual or historic character of a building, townscape or area. Policy LP1 requires proposals to that the urban grain and site layout take account of, and improve, existing patterns of development.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				84	2.74	We need to push developers to use decent architects and top-quality materials and details. It won't deter them but if they can get away with that, too many of them will. Let's be aspirational. Let's have more Stirling Prize-winners. Next time we redevelop Upper Richmond Road East let's not replace dross with dross as we have allowed to happen this time. Insist on design competitions?	Comments noted. Policy LP1 requires a high quality of design for all buildings and spaces in the borough. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Diana McCann	Boroughs Coordinator  The Blue Green Economy			1426	2.74	<b>2.74 Design and built form</b>  'the Council will expect development proposals to demonstrate positive design outcomes that can bring benefits for health, wellbeing and quality of life'. Also see 'Placemaking' in Section 3 and LP4 Tall Buildings.  The Council should adopt an interdisciplinary planning framework to support Climate Responsive Urbanism. Built form is a key driver of urban climate. Beyond health and wellbeing / quality of life, built form also has a large impact on building energy management (e.g. reduced urban heat island effect) and air quality (e.g. via wind dispersion of pollution). In a high-density urban fabric the direct and indirect impacts of built form designs need to be better understood in order to incorporate better guidance via a planning framework.	Comment noted. Insert "as well as sustainability" at end of paragraph 2.74.	Insert "as well as sustainability" at end of paragraph 2.74.
Elizabeth Hopkirk				85	2.75	I like a good tall building and an exciting skyline in the right place but what I worry about is the pedestrian experience. We need plan-led planning in places like Nine Elms so that the public realm makes sense and we don't just have a forest of towers growing alongside A roads and gyratories. You can get high densities from mid-rise buildings set along streets and squares.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone.	No changes to the Local Plan are considered necessary
Mr Robert	Chair  The Putney Society			290	2.75	There's a huge difference between these true landmarks, often with only a tall tower or spire at the entrance and tall private blocks of flats now promoted as 'landmarks'. <u>See comments on policy LP4.</u>	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary

Arguile								
Lois Davis	Co-ordinator Wandsworth Green Party			476	2.75	2.75 appears to favour well designed tall buildings but does not address the issue of proximity of buildings to each other. At VNEB the space between buildings is so tight that little light or sun will penetrate to ground level. There should be more clarity around what is the optimum height for residential development. We believe 10 storeys should be the maximum height.	Paragraph 2.75 provides a broad approach to Tall Buildings with detailed considerations addressed in LP4.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Paul Dolan				516	2.75	Tall buildings outside the city of London have no place, they are a poor legacy of local authority grants that aided increase in height of buildings. Tall buildings are expensive to maintain, cannot be retrofitted cheaply as a traditional home (up to three storeys), are inherently unsafe not only with regard to fire (Greenfall) but in regard to security of its occupants (see Alice Coleman "defensible space"). We must not promote tall buildings in Wandsworth for the few and dismiss the objections of the many in low rise homes.	Paragraph 2.75 recognises that tall buildings have a place in Wandsworth's townscape and recognises that when designed and located correctly they can play a vital role in meeting the borough's housing needs and enhance the character of the borough.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				86	2.78	It's got to be good quality and zero carbon.  I support the idea of variety and, as I mentioned at the start, it would be good to encourage self-build groups (like RUSS in Lewisham) and intentional multi-generational communities (like in Germany).	Comment noted. Policy SDS1 supports self/custom-build development, in particular on small sites, provided the scheme is in accordance with all other development plan policies. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Cyril Richert	Clapham Junction Action Group			1657	2.80	<b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b>  2.80 page 27  Co-living will be discouraged unless it would be provided on sites that are not suitable for development for conventional units, and it would not result in an over-concentration of single person accommodation in the neighbourhood to which it relates.  2.80 This is supported	Support noted.	No changes to the Local Plan are considered necessary
Paul Dolan				517	2.81	We cannot build "affordable housing" that have a highly unaffordable qualifying income of above £65,000 per annum. This strategy is dead and we must support the build to rent, by private developers with subsidised rent from the L.A.. This can provide cheap clean accommodation for the many on low income and allow for a younger working population that needs accommodation that does not locationally tie them down.	Paragraph 2.81 highlights the 'Housing for All' programme that is addressing some of the comment's issues.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Cyril Richert	Clapham Junction Action Group			1659	2.83	<b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b>  2.83 page 28  The borough's town centres will provide a focus for new development.  This is in opposition to previous statements that the Local Plan aims at maintaining the character of the area. Areas outside town centres such as Osiers Road or York Road could be suitable for more development, following the range of application already granted by the Council. However, in town centres with conservation areas and historical building (for example Arding & Hobbs in Clapham Junction) some new developments may be less appropriate.  2.83 Suggest: "The boroughs already developed with high density zones will primarily provide a focus for new development, in respect to the local character of the area."	Paragraph 2.83 highlights town centres as a focus for development. This is not exclusive. These are other areas that would support development including Focal Points of Activity. Indeed, the Plan establishes 71 sites that have been allocated for development. These are primarily presented through seven Area Strategies.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			291	2.84	<u>See the comment against 2.11 above.</u>	Housing and economic development policy as presented in Chapters 17 and 18 promote provision to meet local need. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			292	2.85	Community uses too please, whose users may then use the shops.	Community uses would be included in town centre uses (Class E).  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary

Miriam Howitt				123	2.86	Point 2.86 records "increase in active travel across the borough". In this respect Roehampton urgently needs the extension of the K3 bus route through the Alton Estate, down Danebury Avenue with a bus-only barrier to prevent other vehicles using it, to Priory Lane, down to the bus stop for Barnes Railway Station, returning the same way. This would give public transport access to the Roehampton Gate of Richmond Park, 900-pupil Ibstock Place School, the Templeton Housing Estate and other residences in and off Priory Lane, the Bank of England Sports Ground (used for Wimbledon Primaries, school soccer matches) and Swimming Pool, The National Tennis Centre, The Priory Hospital and School, a Nursery School used as a Polling Station, Paddock School for Special Needs Children, Lennox and Woking Close Council Estates in one direction and link isolated Putney Vale Housing Estate, ASDA and Kingston Hospital in the other direction. This is a priority in Roehampton.	Comments noted. PM8 Roehampton Place Based Policy sets out measures to improve public transport in Roehampton.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			293	2.86	But not for all. The town centres are all on low ground. Try cycling a week's family shopping up to Roehampton or Wandsworth Common in the rain.	Commented noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			464	2.86	People First We support the aims to promote active travel (2.86-2.88) and the development of 15-minute neighbourhoods (2.89). However, 15-minute neighbourhoods require consideration, not only of the town centres, but also of the radius of surrounding residential streets if they are to be attractive to visit on foot or by bike. To date, Low Traffic Neighbourhoods are the closest approximations of 15-minute neighbourhoods existing in the UK. We would argue that putting People First requires a plan and policies for reallocating space away from vehicles (traffic and parked) and towards creating healthy and liveable residential neighbourhoods for people. Reallocated space can also be used for tree planting, sustainable drainage and other climate change mitigation measures.	Support noted.	No changes to the Local Plan are considered necessary
Alan Pates				25	2.88	2.88. The emphasis of the policy on improving the cycle infrastructure as written appears to be concentrated on new bridge links across the River. Rather than spending money on 'Headline projects' the money would be spent far more effectively on improving the cycle infrastructure within the Borough and this should appear as the principal aspiration of the Council.	LP51 Sustainable Transport sets out that developments in Wandsworth will be people focused and be required to meet the healthy streets objectives by creating greater amount of active travel infrastructure. Para. 2.87 highlights that new quietway cycle routes are being delivered as part of a London-wide network, and Cycle Superhighway routes 7 and 8 run through the borough to central London from Tooting and Wandsworth respectively. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				87	2.88	Good. More of this, please. Plus secure cycle parking for residents. And don't forget cargo bikes. They need wider lanes and storage.	Comment noted. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary
Dr Asif Din				243	2.88	A full evaluation on the impact on the Nine Elm boat community is required on proposed bridge	The delivery of the new pedestrian and cycle bridges between Pimlico and Nine Elms and its impacts will be assessed as proposals are brought forward.  Comments noted. No impact on Local Plan	No changes to the Local Plan are considered necessary
Mrs Sasha Brendon				426	2.88	This is all great news!	Support noted.	No changes to the Local Plan are considered necessary
Tony Hambro	St George's Sq. Residents' Association			1081	2.88	Para 2.88 approx. page 29 /31 "Investment in new infrastructure such as new pedestrian and cycle bridges between Pimlico and Nine Elms, and between Battersea and Fulham (the Diamond Jubilee Bridge), as identified in the LIP, will be delivered over the course of this Plan to contribute to this ambition." Delete please.	Paragraph 2.88 sets out proposals in the Local Implementation Plan.  Comment Noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Elizabeth Hopkirk				88	2.89	I support this. We should include access to trees and nature within that 15-min radius. For everyone. If you live at the top of a tower by the time you've got to the ground your 15-mins is nearly up so everything will have to be closer.	Comment noted. This is reflected in the 14 principles for Cohesive, Connected and Healthy Communities.	No changes to the Local Plan are considered necessary
Mrs Sasha Brendon				427	2.89	Please do more to advertise the benefits of cycling and walking and promoting the 15-minute neighbourhood. They have been shown to be hugely beneficial to the health of local people but also incredibly financially successful.	Comment noted. The Local Plan establishes an appropriate emphasis on active travel and 15-minute neighbourhood. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Dr John				530	2.89	I assume that you are using this term to describe a neighbourhood in which one could walk to everything required within 15 minutes?	Yes.	No changes to the Local Plan are considered necessary



Fletcher						<a href="https://www.highstreettaskforce.org.uk/resources/details/?id=74e8f708-38d2-4ade-a22c-76754e911818">https://www.highstreettaskforce.org.uk/resources/details/?id=74e8f708-38d2-4ade-a22c-76754e911818</a>		
Susie Morrow	Chair Wandsworth Living Streets			664	2.89	Page 29 – “15 minute Neighbourhood” – this needs to be clearly defined, since it is not a distance metric and is therefore open to interpretation depending on transport mode	The neighbourhood is defined based on walking, cycling and public transit access. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Cyril Richert	Clapham Junction Action Group			1660	2.91	<b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b>  2.91 page 29  The potential scale of development at Clapham Junction will be dependent on the delivery of Crossrail 2; but the Plan provides sufficient flexibility to be able to accommodate opportunities that could come forward in the shorter term whilst ensuring that a future Crossrail 2 scheme is not compromised.  The delivery of Crossrail 2 is currently out of the 15 years period that the new local plan aims at covering. Therefore, there should be no mention of the relation between the “potential scale” and “Crossrail 2”. We acknowledge that the prospect of Crossrail 2 in the future prevents some developments on reserved land for the project. However, the Council approved plans for the area is already taking into account the increase of public transport need and therefore, on the contrary, the scale of developments at Clapham Junction and their cumulative effects should already affect future prospects.  2.91 Suggest: “Any future provision of housing at Clapham Junction will be dependent on the transport capacity; the Plan will particularly focus on the cumulative impact of developments and their consequence on the provision of public transport.”	Paragraph 2.91 establishes that redevelopment of land around the station will enable substantial improvements to be made to the station and access to it. This suggests that investment in public transport infrastructure will be expected to meet need.  It is pertinent to retain flexibility to accommodate Crossrail 2.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Tony Hambro	St George’s Sq. Residents’ Association			1082	2.93	Para 2.93 p 30/ “A key component in the realisation of this will be the provision of the new Nine Elms-Pimlico pedestrian and cycle bridge, that will connect the community on the north bank of the Thames in Pimlico with Nine Elms and the wider area. The bridge also provides the opportunity to establish a world-class public realm with open space as part of the approach to the bridge.” No benefit for Pimlico, delete please	The proposal for the bridge has been established through the Local Implementation Plan. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Michael Atkins	Senior Planning Officer Port of London Authority			1444	2.93	<b>See the attachment on comment 1441 the representation for context</b>  Paragraph 2.93 refers to the Battersea Power Station site, the associated Vauxhall, Nine Elms, Battersea (VNEB) Opportunity Area Planning Framework (OAPF) and the target for 18,500 homes and 18,500 jobs to reflect the known development potential of the area and what has successfully been built. Reference is given to the area that surrounds Kirtling Street and Cringle Street which are among the least developed of the whole VNEB Opportunity Area, as a result of the ongoing occupation of the area by the Thames Tideway Tunnel Kirtling Street works which are estimated to be finished by 2024. It is essential that reference is given here to the fact that there are two wharves located here (Cringle Dock and Kirtling Wharf), safeguarded by Ministerial Direction and consideration must be given to the role these wharves could play over the plan period to help achieve the aims of OAPF. This is particularly important given the target for up to 18,500 new homes in this area which could utilise this key infrastructure as part of the areas future development.	Comment noted. Insert “...place-based approach (recognising the safeguarded wharves)”.	Insert “...place-based approach (recognising the safeguarded wharves)”. At paragraph 2.93.
Mr Robert Arguile	Chair The Putney Society			361	2.95	How is this to be achieved? Putney Embankment is not adjacent to nor clearly linked to the High Street and has no draws for shoppers. Improvements to the pedestrian route from the High Street to and from the riverside  (east and west) need Council and TfL action.  Planning policies should refuse development around the High Street that does not contribute, including resisting extra height that will aggravate the poor air quality.	Area Strategies have been prepared for Putney and Wandsworth’s Riverside that establish proposals for them.  Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1274	2.95	See attachment for representation  <b>2.95</b>	Comment noted. Insert “, Tooting town centre” after “Market” in paragraph 2.95.	Insert “, Tooting town centre” after “Market” in paragraph 2.95.

						It is disappointing to see so little reference to Tooting in this section, particularly when compared with other town centres. At a minimum the TfL Town Centre plan for Tooting should be referenced here as it contains essential improvements to the A24 and Mitcham Road.		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1496	2.98	In addition to the NHS Long Term Plan reference could be made to the Wandsworth Health and Care Plan and wider service and estate plans for the emerging South West London Integrated Care System. We welcome the reference in paragraph 2.98 to the use of planning obligations for health infrastructure which should be secured in line with the Wandsworth Health and Care Estates Strategy.	Comment noted. Amend paragraph 2.98	Insert ", the Wandsworth Health and Care Plan and the wider service and estate plans for the emerging South West London Integrated Care System." after "(LTP)" at paragraph 2.98
Dr Asif Din				242	Map 2.1	Cycleway/Footbridge will impact boat community ant Nine Elms Pier and this has not been evaluated	Comments noted.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			286	Map 2.1	Clapham High Street station is misplaced. It is where the Overground crosses the Northern line. This map shows clearly the lack of transport in west Putney and Roehampton, and that Crossrail 2 (if it ever happens) won't help here. Barnes station (which serves Roehampton) should be shown.	Comments noted.	Changes have been made to map in response to this comment.
Michael Atkins	Senior Planning Officer Port of London Authority			1446	Map 2.1	<b>See the attachment on comment 1441 the representation for context</b>  Map 2.1 (Public Transport Network) requires an update to include the boroughs four existing riverbus terminals at Putney Pier, Wandsworth Riverside Quarter, Plantation Wharf Pier and Battersea Power Station Pier.  Map 2.1 includes reference to two proposed cycle / pedestrian crossings; Nine Elms bridge and Diamond Jubilee bridge (also known as Cremorne bridge). To confirm the PLA must continue to be involved in discussions with regard to these crossings, to ensure they allow the full range of river uses to continue in this area particularly with regard to operations at the boroughs five Safeguarded Wharves. Further comments on the proposed Nine Elms bridge are provided below in the Area Strategy for Nine Elms section from page five of this response. Map 2.2 (Key Diagram) must also be updated to show the riverbus terminals as well as the boroughs Safeguarded Wharves, particularly as these are located primarily in designated Spatial Strategy Areas.	Comments noted.	<b>The four riverbus terminals have been added to the map 2.1.</b>
Elizabeth Hopkirk				76	Statement 1	I broadly support all this.	Support noted.	No changes to the Local Plan are considered necessary
	Wandsworth Cycling (London Cycling Campaign)			955	Statement 1	1. Vision:  Vision by 2038 (p.21) Wandsworth will be the best place to live in inner London as a result of the enhanced quality of the built environment, which puts the health and wellbeing of local residents at its heart. 2.45 The vision for the Active Wandsworth Strategy is to enable Wandsworth to be the most active borough in London by 2022.	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Steve Fannon				890	Statement 1	There has been no evidence or numbers based evidence to highlight what these improvements will look like. How can it be judged if this has been achieved?	A monitoring framework across the Plan will be published at Regulation 19 stage as well as monitoring indicators for the Sustainability Appraisal scoped objectives.	No changes to the Local Plan are considered necessary
Ms Margaret Brett	Southfields Grid Residents' Association			1409	Statement 1	Page 21: we support the need to retain family sized homes and are keen to ensure that these are not overdeveloped and then sub-divided.  Page 22: we support the proposal to make the streets walkable and think this should include a specific reference to making pavements safe.  Page 22; we support the need for rationalising street furniture and would encourage a proactive reduction in telephone boxes, particularly those whose sole purpose seems to be advertising.  Page 22: we think there is scope for considering innovative ways of making our residential streets greener with more vegetation. This includes promoting soft landscaping rather than permeable hard surfaces in front gardens.	Comments and support noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary

Elizabeth Hopkirk				77	Statement 2	I broadly support all this.	Support noted.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			453	Statement 2	<p>Action on Climate Emergency requires a complete shift to very low or zero carbon electricity generation, mostly renewable and much of it decentralised. We welcome Environmental Objective 3 in chapter 2 to increase the proportion of energy generated locally and from renewable sources. However although the Council continues its commitment to application of the Energy Hierarchy we did not find any targets for generating renewable energy to drive this objective.</p> <p>Social Objective 3 in chapter 2 outlines the intention to explore opportunities for replacement and regeneration as a means of bringing buildings up to modern day environmental standards but seems not to have considered the issue of embedded carbon.</p>	<p>Indicators associated with the Local Plan will be published at Regulation 19 stage. Attention is drawn to Policy LP10 that promotes outstanding BREEAM outcomes for non-domestic buildings and the application of other sustainable construction and design standards.</p> <p>Comments noted. No impact on the Local Plan.</p>	No changes to the Local Plan are considered necessary
Mr Angus Robertson	member Alton Action			550	Statement 2	<p>Comment on Social Objectives, No. 3:</p> <p>We agree strongly with the approach of improving buildings through retrofitting, where possible.</p> <p>The possibility of retrofitting has not been explored and evaluated in the context of the potential regeneration of the Alton Estate.</p> <p>The potential of improving buildings there through retrofitting should be examined in line with 'Better Homes for Local People; the Mayor's good practice guide for estate regeneration' (Mayor of London, 2018) which states that developments should 'always consider alternatives to demolition and balance the benefits with wider social and environmental impacts.</p>	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
	Wandsworth Cycling (London Cycling Campaign)			959	Statement 2	<p>Economic objectives</p> <p>(p.23) 5. Support development proposals that contribute to a safe, green, accessible and integrated transport system ... with improved access by foot, bicycle or public transport to and from surrounding areas, particularly central London.</p>	Support noted.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1271	Statement 2	<p>See attachment for representation</p> <p><b>Statement 2, Objectives, Environmental Objectives</b> These objectives should include specific reference to Sustainable Transport as it is a main element of the WESS and a key way to mitigate the environmental impacts of pollution referenced in point 6.</p>	Economic objective 5 promotes sustainable transport. Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1492	Statement 2	<p>Objectives</p> <p>Health and wellbeing cuts across many environmental, social and economic objectives. We welcome social objective No 7, but we suggest the following changes:</p> <p>Ensure the creation of healthy environments <u>and</u> <u>developments</u> that <u>and</u> support healthy and active lifestyles, including <u>through</u> measures to reduce health inequalities. This includes ensuring there is an appropriate range of health <u>and</u> <u>care</u> facilities which meet local needs <u>and</u> <u>support service transformation</u>.</p>	Amend social objectives 7	Amend social objectives 7 to read: "Ensure the creation of healthy environments and development that support healthy and active lifestyles, including through measures to reduce health inequalities. This includes ensuring there is an appropriate range of health and care facilities that meet local needs and support service transformation."
Michael Atkins	Senior Planning Officer Port of London Authority			1447	Statement 2	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>The PLA in principle support economic objective 1 to maximise the economic potential of land in the borough by safeguarding land and buildings for business and industrial use. It is considered that this objective is made stronger by specifically referring to the boroughs Safeguarded Wharves as part of the economic land that must continue to be safeguarded.</p> <p>In principle support the vision aim to protect and enhance the boroughs parks and open spaces, including specifically the Thames and Wandle Valley corridors. Also support environmental objective 7 to protect and enhance the River Thames and its tributaries, recognising the multiple opportunities they provide for recreation, wildlife and river-based transport.</p>	As the objective is broadly framed there is no need to refer to the safeguarded wharves directly. Support noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary

Mr Robert Arguile	Chair The Putney Society			294	Policy SS1	<p>A. <i>The Local Plan will promote growth to deliver the Council's vision by directing new development</i></p> <p>C. <i>The Local Plan will prioritise the redevelopment of brownfield land, vacant and underused buildings.</i></p> <p>The reality is that the planning system cannot direct proposals for one site to be built on another. These only have teeth if they say you will refuse development elsewhere.</p>	Comment noted. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Steve Fannon				891	Policy SS1	<p>I'm an "existing resident" in Roehampton and do not yet see how this "regeneration" will improve my life. In fact, a dark cloud looms over head by the comment "upgrading the ageing housing stock" for that means all the housing stock which is not currently in scope for demolishing might be considered for demolition by the Council in future. Bear in mind that 1/3 of the maisonettes are proposed to be demolished and 2/3 are not yet they must be deemed "ageing housing stock" by this text.</p> <p>Additionally, 23 out of the 129 non-Council owned residential properties planned to be demolished are freehold, how can the Council claim they are "aged housing stock"? Link to paper 17-6 Appendix B- <a href="https://democracy.wandsworth.gov.uk/documents/s48052/Appendix%20B.pdf">https://democracy.wandsworth.gov.uk/documents/s48052/Appendix%20B.pdf</a></p> <p>So too the Alton Practice, that is freehold and Block A is dependent on this building being demolished.</p> <p>What's the point of updating the SPD when Council has informed The Putney Society that this is guidance, or something, similar rather than something that must be followed?</p> <p>A topic of ongoing discussion in the Roehampton Partnership and Labour Party leaflets is public transport. TfL has attended the Partnership meeting on a few occasions and I have emailed the TfL contact directly, yet there seems to be any real movement on resolving this issue other than to highlight it is a problem.</p>	<p>Policy SS1 sets out a broad spatial development strategy across social, economic and environmental considerations. Certainly, promoting regeneration is a key component. The details of policy application will be the subject of community engagement across the plan period.</p> <p>Comments noted. No impact on the Local Plan.</p>	No changes to the Local Plan are considered necessary
Kin Development		Ben Ford	Director Quod	1025	Policy SS1	<p><b>SS1 Spatial Development Strategy - SUPPORT</b></p> <p>Kin support Policy SS1 Spatial Development Strategy which promotes growth to deliver the Council's vision by directing new development including new homes, shops, economic activity, facilities, services and infrastructure to borough's Investment and Growth Areas of a. Nine Elms Opportunity Area and b. Wandle Delta area.</p>	Support noted.	No changes to the Local Plan are considered necessary
VSM Estates	VSM Estates	Freya Turtle	Associate Director Turley Associates	1058	Policy SS1	<p>Policy- SS1 Spatial Development Strategy</p> <p>London Plan conformity- Policy SS1 seeks to direct new development (new homes, shops, economic activity, facilities, services and infrastructure) to the Nine Elms Opportunity Area. We consider this strategy to be in accordance with London Plan Policy SD1, which seeks growth at Opportunity Areas.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - We agree that directing development to the Opportunity Areas is an appropriate strategy.</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - Policy SS1 is consistent with the impetus of the NPPF in so far as it seeks growth in sustainable location (i.e. Opportunity Areas).</p> <p>Suggested amendments to policy - No comment.</p>	Support noted.	No changes to the Local Plan are considered necessary
Riccardo Composto	Tooting Healthy Streets			1275	Policy SS1	<p>See attachment for representation</p> <p><b>SS1</b></p>	The London Plan identifies parts of Tooting as a Strategic Area for Regeneration. Further detail is contained in the Area Strategy for Tooting, which sets out a holistic approach that will steer regeneration activity in the area.	No changes to the Local Plan are considered necessary

						<p>'The Council will also promote regeneration initiatives in Tooting' This reference should be made more specific in line with the commitments to other parts of the borough such as Clapham Junction and Roehampton. There is a 'Regeneration zone' marked on Map 2.2 but it is unclear what this refers to specifically - it may or may not refer to the London Plan's Strategic Area for Regeneration.</p> <p>Given the very positive references to environment and active travel throughout the supporting text in section 2 we would expect to see some of this reflected in Policy SS1 so that it has teeth within the Plan.</p>		
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1361	Policy SS1	<p><b>See attachment for full representation and context.</b></p> <p>Cory Comments</p> <p>As significant property owners within the Nine Elms Opportunity Area and Wandle Delta Area we are acutely aware of the pressure for new development. Through this, we are also aware of the impact new development, notably new housing can place on existing occupants within these areas especially uses such as waste management. The New London Plan sets out that new development should through the Agent of Change Principle respect key existing uses and infrastructure and not seek to introduce incompatible uses (through location or design).</p> <p>We therefore request that the Council, through Policy SS1, introduce wording that is cognisant of the crucial role of waste management facilities in the Borough and wider London and note the importance of not undermining the on-going operation through new development.</p> <p>That said we are not opposed to new development and continue to welcome the promotion of directing appropriately conceived and designed proposals to sustainable areas of the borough, including the Wandle Delta Area that includes the Smugglers Way facility.</p> <p>We note that the Council are preparing a Supplementary Planning Document (SPD) to guide development of the Wandle Delta Area and we support open consultation during the facilitation and production of this document to help provide a framework for development in the area.</p>	Comment noted. Matter addressed through policy LP13 - Waste Management. No impact on Local Plan	No changes to the Local Plan are considered necessary
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1494	Policy SS1	<p>We welcome the health and wellbeing section (paras 2.98-2.100) and the recognition that improving physical and mental health and wellbeing is a critical objective of the Local Plan and underpins the concept of placemaking.</p> <p>Paragraph 2.100 refers to the Spatial Development Strategy (Policy SS1) providing the overarching framework for providing 'health and wellbeing benefits for all'. However, there is no reference to health and wellbeing in Policy SS1, although the Placemaking –Area Strategies make reference to Principles for Cohesive, Connected and Healthy Communities (paragraph 3.14) under the 'People First' theme.</p>	Comment noted. Paragraph 2.100 sets out that the Spatial Development Strategy will bring about health and well-being benefits for all. This is a policy outcome. The policy in itself doesn't need to specify outcomes as this is outlined in the supporting narrative (including paragraph 2.100. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1534	Policy SS1	<p><b>See attached the representation for context</b></p> <p>4 Recommendations SS1 Spatial Development Strategy – SUPPORT</p> <p>L&amp;G support Policy SS1 Spatial Development Strategy which promotes growth to deliver the Council's vision by directing new development including new homes, shops, economic activity, facilities, services and infrastructure to borough's Investment and Growth Areas which comprise the Nine Elms Opportunity Area and the Wandle Delta.</p>	Support noted.	No changes to the Local Plan are considered necessary
Safestore		Matthew Lloyd Ruck	Planner Savills	1382	Policy SS1	<p><b>See attached the full representation for context</b></p> <p>Spatial development Strategy - SS1</p> <p>We are pleased that policy SS1 recognises the opportunities to deliver significant growth within the Nine Elms Opportunity Area. The draft plan draws</p>	Comment noted. The Local Plan is a performance based policy framework. It establishes certain requirements and considerations through site allocations. These are evidenced based and supported through the policies of the Local Plan. No impact on the Local Plan.	No changes to the Local Plan are considered necessary

						<p>upon the potential for further growth and redevelopment within Battersea, which is supported in principle and is in line with the adopted and emerging London Plan.</p> <p>However, the zoning and spatial based design policies within this local plan are overly prescriptive and not in line with the National Planning Policy Framework. Any potential development opportunity within the borough will need to respond to the temporal market context for development, which is constantly evolving. Therefore, the overly prescriptive spatial strategies and site allocations within this draft plan may result in viable development opportunities being constrained by overly prescriptive local strategy, which is based on an out-of date context. For example, each site designation contains a stringent criteria for what development should entail on-site, among other details. Considering the prescriptive detail contained within each allocation, it's considered that the need for any planning application to accord with the site allocation as well as local plan policy to be unduly prescriptive, inflexible and restrictive, constraining any future redevelopment opportunities. As currently drafted, the local plan is therefore not in general conformity with the national policy, specifically paragraph 11 of the NPPF, which seeks to ensure plan policy is sufficiently flexible to adapt to rapid change.</p>		
Cyril Richert	Clapham Junction Action Group			1662	Policy SS1	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>SS1 Spatial Development Strategy page 31</p> <p>The Local Plan will promote growth</p> <p>Is promoting growth the number 1 priority? Or should it be first to ensure that the Local Plan promotes the best life environment for everyone?</p> <p>SS1 Suggest: "The Local Plan will promote growth to deliver the Council's vision by directing new development including new homes, shops, economic activity, facilities, services and infrastructure to:"</p>	Comment noted. The objectives of the Local Plan set out a balanced approach to achieve economic, social and environmental priorities. No impact on the Local Plan.	No changes to the Local Plan are considered necessary
DTZ Investors		Neil Wells	Quod	1498	Policy SS1	<p>Consultation Wandsworth Pre-Publication Draft Local Plan (Regulation 18) Representations by DTZi</p> <p>Quod is instructed by DTZ Investors ("DTZi") to submit representations to the Wandsworth Pre-Publication Draft Local Plan Regulation 18 ("Reg 18 Plan"). These representations are submitted within the consultation period of 4 January to 1st March 2021.</p> <p>1Background</p> <p>DTZi previously obtained planning permission for 41-59 Battersea Park Road, Nine Elms, on 28 March 2019 for the demolition of all existing buildings and construction of new buildings of between 5 storeys and 18 storeys, containing 307 residential units, business (Class B1) floor space and flexible retail/restaurant and café/business floor space (Class A1-A3, B1 and D1), CHP basement, vehicle and cycle parking, plant and associated works, landscaping and a new access onto Sleaford Street (ref. 2015/6813). This forms an important background to the site allocation, and future opportunities for redevelopment.</p> <p>2Conformity with the London Plan and National Planning Policy</p> <p>To meet the tests of soundness, the Reg 18 Plan must remain in conformity with the London Plan and National Planning Policy. Considering the existing policy direction within National Policy, and the adopted London Plan, we wish to make comment on the following policies within the Wandsworth Draft Local Plan.</p> <p>3 Recommendations</p>	Support noted.	No changes to the Local Plan are considered necessary

						SS1 Spatial Development Strategy –SUPPORT  DTZi support Policy SS1 Spatial Development Strategy which promotes growth to deliver the Council's vision by directing new development including new homes, shops, economic activity, facilities, services and infrastructure to the borough's Investment and Growth Areas which compromise the Nine Elms Opportunity Area and the Wandle Delta area.		
Paul Dolan				514	Table 2.1	I believe that given a net population decrease of London since Covid and the Brexit effect of repatriation of EU citizens since we left the EU that these projected figures are incorrect. At current projections and net increase of those finding secure but empty investment homes by Chinese and Hong Kong dissidents that we will not see a net loss but also not see a net increase of people but this will not be reflected in the increase of foreign owned but not occupied flats. The new flats that are being requested will be the targeted flats for foreign investors and not for a perceived demand from Locals.	The ONS population projections are the best available source of data about population projections. The comment does not include a reference to any alternative sources.	No changes to the Local Plan are considered necessary
Dr John Fletcher				519	Table 2.1	I'm largely commenting on the Tooting area strategy (though I will comment on other sections). That strategy seems to be largely focused on the two main roads running through the town centre. So two comments here. Young people are less likely to drive ( <a href="https://www.bbc.co.uk/news/science-environment-44849381">https://www.bbc.co.uk/news/science-environment-44849381</a> ) as are those that are Black, Asian or Minority Ethnic ( <a href="https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest">https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest</a> )	Comment noted.	No changes to the Local Plan are considered necessary
Isabella Jack	Sustainable Development Advisor  Natural England			1614	Sustainability Appraisal Comments	<p><b>See attachment on comment 1608 for context and appendices</b></p> <p>1. Sites of Least Environmental Value</p> <p>In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.</p> <p>2. Priority habitats, ecological networks and priority and/or legally protected species populations</p> <p>The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.</p> <p>Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here:</p> <p>Habitats and species of principal importance in England. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.</p> <p>Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider</p>	Support noted	No changes to the Local Plan are considered necessary

						<p>Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.</p> <p>Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 171 of the NPPF.</p> <p>3. Sustainability Appraisal</p> <p>Natural England considers that the SA provides a good framework for assessing the impacts resulting from the Local Plan and site allocations. We are in agreement with the sustainability objectives outlined that relate to Natural England's remit, and that they adequately consider the natural environment, including any impact on designated sites, priority habitats and species.</p> <p>Natural England would welcome further discussion on any of the points raised in this response. Please feel free to contact me at Isabella.jack@naturalengland.org.uk with any questions you may have.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1638	Sustainability Appraisal Comments	<p>See attachments on 1615 for more detail</p> <p><b>Biodiversity – Sustainability Appraisal</b></p> <p>The Sustainability Appraisal concludes that Policy LP57 has a 'very positive effect' against the sustainability objective of biodiversity (2) and green infrastructure (4). Although LP57 – Biodiversity states certain requirements to protect and enhance the boroughs biodiversity, it could go further to be able to ensure net gains are delivered and maximise opportunities to do so. Currently policy LP57 only requires major development to deliver a net gain. This is contrary to NPPF paragraphs 174b and 175d that does not stipulate net gain opportunities are required for certain development types. The cumulative effect of development other than major developments could have an adverse effect on the natural environment and therefore would be suitable to require all development to provide a net gain in biodiversity where there are opportunities to do so.</p> <p>The objective for Biodiversity should clearly state that a Biodiversity Net Gain is achieved. The legal minimum may become 10% once the Environment Bill is passed. However, we feel the Wandsworth could aim for a greater amount for sites if there is sufficient cause to do so. For example, if the borough lacks natural green space for wildlife and people to experience, and if the borough is experiencing an increased population leading to greater disturbance and pressure on existing green infrastructure.</p> <p>The current appraisal does not quantify the ambition for net biodiversity improvements and therefore has no clear way of measuring that net improvements have indeed been met. It is therefore suggested that in order to actually better define this objective that there is some way to tangibly measure it. Firstly by setting a clear Net Gain target for delivery by developments, and secondly by an overall borough wide increase in biodiversity by some other linked measure, such as the amount of habitats or indicator species.</p>	<p>Wandsworth has prepared a Biodiversity Strategy and a Biodiversity Action Plan is forthcoming. This will set out any measurements that made in the future be used to ensure that the overall amount of biodiversity in the borough is increasing.</p>	<p>LP57 Biodiversity has been amended to require all developments to provide a biodiversity net gain.</p>
Rachel Holmes	Planning Advisor Environment Agency			1641	Sustainability Appraisal Comments	<p>See attachments on 1615 for more detail</p> <p><b>Pollution and Waste – Sustainability Appraisal</b></p> <p>The Sustainability Appraisal concludes that policy LP13 – Waste Management has a positive effect on SA objective air quality (short term) with no negative effects that require mitigation. We would like to refer to London Plan Policy SI 8 Waste capacity and net waste self-sufficiency states:</p> <p>1. Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:</p>	<p>Proposed new paragraph to the supporting text of LP 13 signposts enclosure of new facilities and air quality, dust and noise impacts. It is not possible to require existing operators to enclose existing facilities unless they submit a planning application for their site. If a facility is in breach of its environmental permit, this is a matter for the regulator rather than the Local Plan.</p> <p>It should be noted that it is the site that is safeguarded and not the facility.</p>	<p>Additional paragraph added to the supporting text of LP 13 to address enclosure comment.</p>



					<p>4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed</p> <p>The impact of air quality from waste sites not fully enclosed should be considered within policy LP13 – Waste Management. There is no reference or requirement of fully enclosed waste sites or required mitigation to offset any negative effects in air quality from waste sites operating not fully enclosed. We would request consideration for such negative effects to be part of the SA and the policy wording to address the potential negative effects.</p> <p>As noted above, if stronger requirements are not incorporated within Policy LP14 'Air Quality, Pollution and Managing Impacts of Development' then existing waste facilities may have their waste permits removed as a result of a high number of complaints. This conflicts with Policy LP13 'Waste Management' which seeks to safeguard waste sites. It is therefore extremely important that these recommendations are implemented in the policy.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1643	<p>Sustainability Appraisal Comments</p> <p>See attachments on 1615 for more detail</p> <p><b>Section 3 – General Sustainability Appraisal comments</b></p> <p>We recommend the following plans and strategies are added to the Sustainability Appraisal process and demonstrate how they have been considered to inform the development of the new Wandsworth Local Plan. The government's 25 year Environment Plan</p> <p><a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a></p> <p><b>EA2025 action plan</b></p> <p><a href="https://www.gov.uk/government/publications/environment-agency-ea2025-creating-abetter-place">https://www.gov.uk/government/publications/environment-agency-ea2025-creating-abetter-place</a></p> <p>This plan, EA2025, translates our vision for the future into action. We will protect and enhance the environment as a whole and contribute to sustainable development. Through this we will contribute to the United Nations Sustainable Development Goals and help protect the nation's security in the face of emergencies. The plan sets out 3 long term goals:</p> <ul style="list-style-type: none"> <li>• a nation resilient to climate change</li> <li>• healthy air, land and water</li> <li>• green growth and a sustainable future</li> </ul> <p>These goals will drive everything we do today, tomorrow and to 2025. They champion sustainable development, support our work to create better places and challenge us to tackle the climate emergency and deliver a green economic recovery for everyone. National Flood and Coastal Erosion Risk Management Strategy for England (2020)</p> <p><a href="https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-riskmanagement-strategy-for-england--2">https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-riskmanagement-strategy-for-england--2</a></p> <p>The Strategy has three core ambitions concerning future risk and investment needs:</p> <ol style="list-style-type: none"> <li>1. Climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change</li> <li>2. Today's growth and infrastructure resilient in tomorrow's climate: Making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as resilient infrastructure.</li> </ol>	<p>Comments noted. The recommended plans and strategies have been considered in the development of the Local Plan e.g. LP10 Responding to the Climate Crisis and LP12 Water and Flooding, and consider it unnecessary to include within the SA.</p>	<p>No changes to the SA are considered necessary</p>

						<p>3. A nation ready to respond and adapt to flooding and coastal change: Ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action.</p> <p><b>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</b></p> <p><a href="https://www.legislation.gov.uk/uksi/2017/407/contents/made">https://www.legislation.gov.uk/uksi/2017/407/contents/made</a> <a href="https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality">https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality</a></p> <p><b>Wandle and Thames Catchment Water Framework directive status data</b></p> <p>The latest Water Framework Directive data sets for the Wandle and Thames Catchments showing the current status of the water environment and identifying the key causes of reasons for low environmental standards.</p> <p><a href="https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039023460">https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039023460</a> This evidence should be used to identify what actions/policies are required through the spatial planning process at policy and planning decision stage to improve the water environment over the lifetime of the new local plan. We understand this catchment is "heavily modified" but there are still a number of actions required to improve the water environment and spatial planning system has a key role to play. It's also essential new development and planning decisions do not result in a negative impact on the water environment or prevent future improvements.</p> <p><b>Environmental Incidents</b></p> <p>Between January and December 2020 there were 40 environmental incidents reported to the Environment Agency incident hotline from across the London Borough of Wandsworth. These incidents ranged from water pollution, waste management issues, flooding, blocked drains, dust and waste fires. We can share this detailed data which we feel should be included in the Sustainability Appraisal /SEA and become a key part of the evidence base to ensure key local plan policies are in place to prevent any repeat environmental issues and any required infrastructure upgrades are in place to deliver the London Plan housing targets.</p> <p>There currently appear to be incident hotspots around Nine Elms, Wandsworth and Chelsea Bridge areas. Addressing these pollution issues can tie into improving green spaces across the borough both in terms of biodiversity improvements and for recreational use. We recommend adding the number of environmental incidents as part of the local plan annual monitoring process to track if numbers of incidents are reducing and if not what partnership actions are required to address the environmental issues.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1488	1.24	<p>See attachments on 1615 for more detail</p> <p><b>Flood Risk – Sustainability Appraisal</b></p> <p>The sustainability appraisal concludes that Policy LP12 – Water and Flooding has a 'very positive' effect against sustainability objective 9 (minimise flood risk and elsewhere and promote the use of SUDS). However we would disagree with that conclusion. Within LP12 – Water and Flooding there is poor reference to ensuring that any proposed development ensures it does not increase flood risk elsewhere which is required under NPPF Exception test. The proposed policy simply mentions 'on site attenuation'. Minimising flood risk should not only take into account the occupants and users of any proposed development but consider potential increased in flood risk offsite where for example there is a loss of floodplain storage. We strongly recommend you action our recommendations to ensure this policy is successful.</p> <p>In addition part F of the policy 'The Sequential Test' outlines that there are certain areas within the borough where the sequential test is considered to have been passed. However, for those sites deemed to have passed the Sequential Test and are located in areas at risk of flooding, no mitigation requirements are specified and no reference to the requirements of the Exception Test as set out in the NPPF is mentioned. Please clarify that all sites are subject to the</p>	Comment agreed.	The wording of the policy has been amended in response to the comments made regarding flood risk off site and the Exceptions Test. The Council's SFRA Level 2 assessment provides details of the mitigation requirements of the Exceptions Test.

						Exception Test where necessary, even if the site is deemed to have passed the Sequential Test.		
--	--	--	--	--	--	--	--	--

## Chapter 3 - Placemaking – Area Strategies

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Secretary to planning committee Battersea Society			750	3.1	<p>PLACEMAKING AND AREA STRATEGIES</p> <p>Overall Comments</p> <p>We have strong concerns about the presentation of the Placemaking and Area strategies. The fourteen themes and principles on which the strategies are based are themselves overlapping – transport, development, and housing, for example, appear twice under different headings – and key terms – such as “responsive development” – are left unexplained and undefined. The list of themes in Table 3.1 is followed by a text box extending over five pages which claims to identify the “drivers” for each of the themes. However, what is presented is a mix of characteristics and features, policy objectives and goals, expressed randomly in the present tense and as future imperatives. There is no attempt to link the policies and objectives for each of the nine area strategies to the fourteen themes and principles. Hence it is impossible to judge whether the policies are in line with the Council’s overall Placemaking strategy and objectives.</p> <p>We have reservations about the stated policy that boundaries for the area strategies should not be defined “as these are areas of planning focus interlinked with their surrounding areas”. Since most of the area strategies are based around town centres, we are not clear how this can be reconciled with the policies set out in the NPPF Section 7. We cannot understand what might be meant by the sentence (3.22) “It is anticipated that development proposals that have the potential to contribute to the vision of an Area Strategy will advocate the principles/content of the Area Strategy”. Nor do we understand why nothing at all is said about policies and strategies relating to the “linkages” between the different spatial areas identified on the Key Diagram Map 2.2. We consider the pressure for development and land use changes in the York Road/Lombard Road area justify its being considered through a discrete area strategy, and not subsumed within Wandsworth Riverside (see our comments below on that Area Strategy)</p>	<p>The Local Plan establishes the key drivers for each of the 14 place-making principles. These inform the considerations for Place Performance presented for each Area Strategy as presented at paragraphs 3.15 and 3.16 (Developing Area Strategies). The Area Strategies are focused on the borough’s town centres and, together with the policies of the Local Plan, support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation as required by paragraph 85 of the NPPF.</p> <p>Paragraph 3.22 clearly establishes that development proposals that could contribute to the outcomes promoted through an Area Strategy (established through the PM policies) should respond appropriately.</p> <p>Policy SS1 could be developed to promote active travel and public transit.</p> <p>Lombard Road/ York Road Riverside Focal Point Supplementary Planning Guidance (2015) provides an appropriate framework that is referenced in the Wandsworth’s Riverside Area Strategy, as appropriate.</p>	Amend Policy SS1
Katie Parsons	Historic Environment Planning Adviser Historic England			870	3.1	<p>Place Policies:</p> <p>The plan has not adopted a design-led approach to defining sites capacities as required by London Plan policies GG2.D and D2.</p> <p>The Urban Design Study makes detailed recommendations. It is important to ensure that these are translated into the plan policies to ensure that they are justified and therefore sound.</p> <p>The Urban Design Study identifies negative elements within Wandsworth, but the plan does not seek to address these. In the interest of developing a positive strategy for the conservation and enhancement of the historic environment, opportunities to improve the quality of the historic environment ought to be highlighted and encouraged within the plan.</p>	<p>Revisions were made to the Plan. It now adopts a design-led approach to defining site capacities as advocated by London Plan policies GG2.D and D2. The methodology is set out in in the Urban Design Study.</p> <p>It is unclear which recommendations set out in the Urban Design Study have not been transposed into the plan policies. The recommendations set out in the Urban Design Study were incorporated in the Local Plan where possible. It is anticipated that the findings of the Urban Design Study will also be used to develop design codes (as advocated by the NPPF and London Plan) for some parts of the borough to provide clear design guidance for development in those areas.</p>	Housing and Economic Land Availability Assessment revised to reflect a design-led approach to defining site capacities.
Hassan Ahmed	GLA			1111	3.1	<p>Design</p> <p>The Mayor welcomes the borough’s commitment to ensuring that new development supports the creation of a coherent and high-quality built environment as a key component of the Local Plan with a policy approach underpinned by a deep understanding of the values, character and sensitivity of different parts of the borough. This is broadly in line with the design-led approach set out in the PLP, particularly as set out in Chapter 3. Policy D1 of the PLP establishes that an understanding of local character is essential in determining how different places may best develop in the future. To this end the Mayor particularly welcomes Wandsworth’s commissioning of an Urban Design Study which provides an up-to-date and thorough understanding of the local character in various areas across the borough and which it is understood from paragraph 14.7 is an integral part of the evidence base on which the draft Local Plan has been developed.</p> <p>Wandsworth’s support for a design-led approach to new development including the use of design codes and design review where appropriate, and the use of tools such as 3D digital modelling is particularly welcomed. Local policy should ensure that it is consistent with the requirements for the use of these tools as set out in PLP Policies D2, D4 and D9.</p>	<p>Support to the borough’s commitment to ensuring that new development supports the creation of a coherent and high-quality built environment is noted.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						The GLA is developing a number of pieces of London Plan Guidance which may be of use when further refining the policy as the emerging Local Plan progresses. This includes the Good Quality Homes for all Londoners London Plan Guidance and the Public London Charter.		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1514	3.1	The draft Plan includes seven Area Strategies and two strategies which cover wider areas Wandsworth's Riverside and Wandle Valley. Each strategy has site allocations. These large sites are expected to provide 15,200 homes or 74% of the ten-year housing supply. There are also site allocations outside of the spatial areas.	Comment noted. No changes to the Local Plan are considered necessary	No change to the Local Plan required as a result of this representation.
Cllr Graeme Henderson Cllr Jo Rigby				923	3.4	<b>Holistic Development</b> We believe planning policy should allow for developments that are close to each other to be considered in a holistic way, taking into account the impact they will cumulatively have on the area rather than treating them as separate developments. For example, the re-development in Earlsfield of the Atheldene site and that of the "Workspace" / Riverside Industrial Estate on the opposite side of Garratt Lane gave a once in a generation opportunity to re-generate this compact Inner London area whilst ensuring that the development and its facilities fully met the needs of local When complete, the two developments will place an enormous strain on resources and facilities in the immediate area which, in our opinion, need to be considered as a whole. We have asked for a Spatial Strategy for the area [Earlsfield], but have been told that is only done for Town Centres. This is something that needs to be rectified for the future.	Comment noted. Earlsfield is recognised as a local centre and the policy framework seeks to promote it as such. Further, the Wandle Valley Area Strategy includes Earlsfield. Consequently, the Local Plan provides a solid basis for promoting the centre and assessing development proposals. No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
Elizabeth Hopkirk				89	3.12	I'd like to see People and Nature first.	A key Placemaking principle introduced at 3.14 is: Engages with nature to support biodiversity and climate change management through blue/ green infrastructure. This gives a priority for nature in the place approach. No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			957	3.12	<b>Objectives:</b> Area Design - People First(p.35) .. places communities and the individuals within them at the centre to create more sustainable, sociable and healthier places that maximise wellbeing and quality of life. This requires a balanced approach to movement and connectivity that supports walking and cycling.	Support noted.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			295	3.14	The phrase 'motherhood and apple pie' comes to mind reading these. If you want this to happen then policies need to say clearly who provides what, and that consent will be refused if they don't. What is the Council going to do to improve low PTAL scores?	Commented noted. The 14 place-making principles establish the focus for cohesive, connected and healthy communities across the borough. These inform approaches presented within the Area Strategies and addressed across the policy framework.  No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
Lois Davis	Co-ordinator Wandsworth Green Party			475	3.14	We commend the inclusion of "engaging with nature" as one of the characteristics for successful places as laid in the Placemaking column of 3.14 but overall, we feel that the Council should be more proactive in this area.	Comment noted. The Local Plan strikes an appropriate balance across social, environmental and economic considerations addressing the scoped objectives of the Sustainability Appraisal. No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
Mr Monger	Director London Historic Parks and Gardens Trust			1238	3.14	Pre-Publication' Draft Local Plan (Regulation 18) (November 2020) London Historic Parks & Gardens Trust (LGT) strongly support Para 3.14 The principles that underlie the draft plan in particular: Provides and values inclusive, accessible and connected open spaces for recreation. Ensures that day-to-day facilities are accessible (15-minute neighbourhood). Promotes identity in the townscape and values heritage.	Support noted.	No change to the Local Plan required as a result of this representation.
Diana McCann	Boroughs Coordinator The Blue Green Economy			1427	3.14	<b>3.14 Principles for Cohesive, Connected and Healthy Communities - Placemaking</b> 'A coherent blue/green infrastructure system helps improve air quality, contribute to biodiversity and support health and wellbeing. It needs to be effectively maintained and managed. Well-designed places have sustainable drainage systems to manage surface water, flood risk and significant changes in rainfall. The urban environment makes use of sustainable drainage systems and natural flood resilience.' The link between blue/green infrastructure and the economy should be made in order to better capture the true value of incorporating blue green (and integrated water resource management) into our designs. For example, there is a direct link to the generation of local low skilled jobs, e.g. generation and	Comment noted. The Local Plan recognises and accommodates the integrated nature of social, environmental and economic considerations and promotes a policy framework and spatial strategy to ensure this. No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>maintenance of the systems, and indirect link to savings that could be made elsewhere, e.g. reduced mental and physical healthcare costs.</p> <p>There are many solutions available beyond incorporation of sustainable drainage systems that tends to dominate the design vocabulary and is therefore limiting in application. For example, options which extend to reducing urban heat island effect (generating urban cool islands) are also discussed in this Earthwatch Europe talk on outdoor thermal comfort [link here - start @ 9min - copy / paste whole link - <a href="https://us02web.zoom.us/rec/share/Sy-lqOk_R4o6m9wt1AdzXnGuFF9geNJ-AnlHMu8YVgcZrmePm_BmRVX791DufOX.1t6Tlsm-gLnYABhz">https://us02web.zoom.us/rec/share/Sy-lqOk_R4o6m9wt1AdzXnGuFF9geNJ-AnlHMu8YVgcZrmePm_BmRVX791DufOX.1t6Tlsm-gLnYABhz</a>].</p>		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1516	Figure 3.2	<p>The Area Strategies include a Place Performance diagram. It includes an assessment of 'health' which has been informed by strategies, such as the Health and Wellbeing Strategy and by consultation with stakeholders. It is unclear what factors have been taken into account to assess the health of a place. For example, Wandsworth Town Centre scores well on access to health and services (15-minute neighbourhood), but poorly with regard to 'health', presumably largely due to the unhealthy Wandsworth Gyrotray system.</p>	<p>Comment noted. The relevant Place principle says:</p> <p>"Improves and maximises physical and mental health and wellbeing in built form, homes, community spaces and public space – Well designed places promote activity and social interaction, contributing to health, wellbeing, accessibility and inclusion. Public spaces are integrated, support social interaction and are inclusive. Attractive, safe and enjoyable public realm that supports community activities is established.</p> <p>Places capitalise on a community's assets that promote people's health, happiness, and wellbeing. It strengthens connection and defines the physical, cultural and social aspects of community"</p> <p>No changes to the Local Plan are considered necessary.</p>	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			296	Map 3.1	<p>E1 Roehampton Lane N is not a coherent area. The Roehampton Gate area and the residential east side of Roehampton Lane are separated by the impermeable Roehampton Club.</p> <p>The University main campus should be in E2 with the rest of campus.</p>	<p>Comment noted. The boundaries of character areas were subject to public engagement and are considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			297	Policy PM1	<p>This policy text is too vague to be resistant to appeals. <u>See the comment on para 3.14 above</u></p>	<p>Comment noted. Policy PM1 is robustly framed. It will be tested at the Examination in Public, if appropriate. No changes to the Local Plan are considered necessary.</p>	No change to the Local Plan required as a result of this representation.
VSM Estates	VSM Estates	Freya Turtle	Associate Director Turley Associates	1059	Policy PM1	<p><b>For full context, see the attachment with comment 1058</b></p> <p>Policy - PM1 Area Strategy and Site Allocations Compliance</p> <p>London Plan conformity - No comment.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - No comment.</p> <p>NPPF: effective - Policy PM1 allows for development not consistent with the Site Allocations to be approved so long as there are material considerations that indicate it is appropriate. We would suggest that in addition, reference is also made to changes to London Plan and national policy as being circumstances in which development can deviate from Site Allocations. This flexible approach would ensure that the Local Plan can be deliverable in terms of meeting overarching growth objectives.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - Reference to be made to changes to London Plan and national policy, as being circumstances in which development can deviate from Site Allocations.</p>	<p>Comment noted. Each proposal will be assessed on its own merits taking into account the development plan (that includes the London Plan) and any relevant material considerations (that include the NPPF). Consequently, there is no need to amend policy PM1. No changes to the Local Plan are considered necessary.</p>	No change to the Local Plan required as a result of this representation.
Mr Malcolm Souch	Project Director NHS London Healthy Urban			1497	Policy PM1	<p>The draft Plan includes seven Area Strategies and two strategies which cover wider areas Wandsworth's Riverside and Wandale Valley. Each strategy has site allocations. These large sites are expected to provide 15,200 homes or 74% of the ten-year housing supply. There are also site allocations outside of the spatial areas.</p>	<p>Comment noted. No changes to the Local Plan are considered necessary.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Development Unit (HUDU)							
Cyril Richert	Clapham Junction Action Group			1663	Policy PM1	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>3. Placemaking – Area Strategies</p> <p>PM1 Area Strategy and Site Allocations Compliance page 43</p> <p>Proposals which do not comply with the Area Strategy and Site Allocations will be resisted unless material considerations clearly indicate that an alternative type of development is appropriate and where the development would be in accordance with all other relevant development plan policies.</p> <p>This is generally supported. However, there should be additional mention of the overdevelopment, harming the existing character of the area and the cumulative impact of developments.</p> <p>PM1 should include additional precision:</p> <p>In addition, proposals will be resisted if any of the following criteria is met:</p> <ul style="list-style-type: none"> <li>- overdevelopment in comparison of existing neighbourhood,</li> <li>- harming the neighbourhood and local context</li> <li>- risks assessed with the cumulative effect of existing and planned development in the neighbourhood.</li> </ul>	Comment noted. The Local Plan policies allow development proposals to be appropriately assessed that would resist overdevelopment or other adverse impacts. No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			958	Table 3.1	(p.39) Supports active travel (walking and cycling) that ensures ease of movement and accessibility – Patterns of movement for people through active travel are integral. Success depends upon ... [providing] a genuine choice to use active travel ... This requires a network of active travel routes with a clear structure and hierarchy	Comment noted. Amend plan to reflect comment.	Amend People First Active Travel principle.
Mr James Thompson	Director Northport FPR Limited	Mr Kevin Goodwin	KG Creative Consultancy	437	Proposed Site Allocation	<p><b>Site Specific</b></p> <p>9. The subject site is located on the south side of Fawe Park Road, between the rear of the houses in that road and the railway line, that serves Putney Station to the west and Wandsworth Town to the east.</p> <p>10. Neither the printed nor interactive version of the local plan policies map show that the site is subject to any designation. However only investigation was there a reference to the railway lands buried in a schedule.</p> <p>11. However, given this land is secured by Network Rail as it is unfenced from the operational railway network, the Council has neither historically accessed the site or requested any access to the site to verify the value or otherwise of the site in nature conservation terms. In contrast we submitted as part of the previous preapplication submission detailed ecological and biodiversity reports that confirmed that other than a number of trees on the site it actually had limited nature conservation value. This informed the proposals for a residential led proposal, with a net biodiversity gain.</p> <p>12. After significant investigation, the designation 'hidden' in the extant local plan</p> <p>seems to have been solely informed by the fact the site is linear, is former railway land and adjoins a railway line and so must have ecological and biodiversity value.</p>	Land to the southside of Fawe Park Road is a designated SINC. Consequently, it is inappropriate to promote as a site allocation within the Local Plan	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>But this is not underpinned by any actual evidence.</p> <p>13. The draft Local Plan is accompanied by a document entitled 'Policies Map Changes Document Local Plan Regulation 18 Consultation Version November 2020'. Figure 18 within this document on page 24 is entitled 'Sites of Importance to Nature Conservations' and shows the subject site, at small scale, within a broadly linear green strip to the north of the railway line and to the east of Putney Station.</p> <p>14. The reason for inclusion of this plan is stated as: The Policy Map includes asterix within this designations Metropolitan Open Land; Statutory Local Nature Reserves; Historic Parks and Gardens; Other Larger Protected Open Spaces which identify which sites are also Sites of Importance to Nature Conservation (SINCs). These asterix are proposed to be removed and a separate SINCs designation be included in order to show the exact boundaries of SINCs and the different levels of designation. The designation is proposed to be included to support the Local Plan Policy LP 57 Biodiversity.</p> <p>15. However this is the reasoning for including the Figure, rather than the reasoning for the site designation in the first instance.</p> <p>16. The draft local plan itself deals with Nature Conservation at draft Policy LP57 and the supporting text. Paragraph 21.28 states "Wandsworth has a high level of biodiversity, with a total of 1,600 different species recorded within 27 different habitat types. We host six species of bats, have badger sets and several rare and endangered species can be found in Wandsworth, including peregrine falcons, black redstarts and stag beetles. Wandsworth's areas of biodiversity importance include Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINC), which also includes two subcategories of borough and local importance..... A variety of smaller sites also exist but are not large enough to be mapped".</p> <p>17. Map 21.3 then sets out the mapped areas of Nature Conservation Importance. As noted in Figure 18.3 of the Policy Map Changes the subject site is located within a wider broadly linear site shown as 'Borough Grade II', the lowest level, other than areas deemed to be of only 'Local' interest.</p> <p>18. The draft Local Plan is supported and underpinned by a number of topic based areas of evidence. However, there is no evidence base that specifically deals with Nature Conservation or Biodiversity. There is an evidence document on Green Infrastructure that in this context means Open Space and this shows at Figure 5.1 on page 28 "Natural and semi-natural greenspace mapped with 720m catchment including NSN sites outside Wandsworth boundary". But these areas do not include Nature Conservation areas.</p> <p>19. Therefore the sole basis for the inclusion of the subject site within a designation for Nature Conservation appears to be simply a role over from an historic document that designated it, that itself was based upon, at best, a view from adjoining land, rather than an access and a detailed assessment as to the sites real value. This is a significantly flawed approach where an error is simply rolled forward in the hope that it will become reality.</p> <p>20. There is recent evidence that we submitted with the pre-application discussions as to the lack of any significant value in the site that has simply been ignored in the inclusion of the site in a historical designation.</p> <p>21. The site that extends to 1.38ha has been promoted for a residential led development of up to 100 dwellings, together with amenity, playspace and</p>		



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						biodiversity enhancements. The potential of the site to contribute to the supply and delivery of housing in Wandsworth has been dismissed.		
Mr Will Lingard				1694	Proposed Site Allocation	Furthermore, at the time of the Call for Sites consultation, the charity was not in a position to confirm the availability of their land at Nightingale House (105 Nightingale Ln, London SW12 8NB). Their position has now changed, and we would wish for the site to be identified as suitable for development and work with the council to find a viable solution that secures its long term future.	Nightingale House is a Grade II listed building. The site is not located within an opportunity area; Thames Policy Area; Focal Points of Activity; Town Centre; Regeneration Area or an Economic Use Intensification Area. Site-specific policy to secure the best development outcome would not be required for this site as it is not likely to make a significant contribution towards meeting the borough's development needs. Further, the prevailing urban character (including its Grade II listing) ensures the site would be constrained in its development potential. This is reflected in the site's location within a higher sensitive area.  Consequently, the site at Nightingale House, 105 Nightingale Lane does not require site allocation.	No change to the Local Plan required as a result of this representation.
Mr James Thompson	Director Northport FPR Limited	Mr Kevin Goodwin	KG Creative Consultancy	436	Proposed Site Allocation	<p>1. Our clients are in control of land on the south side of Fawe Park Road, Putney (see attached plan) and have promoted these through both a pre-application meeting with the Council and also its 'Call for Sites'. This land is shown on the attached plan.</p> <p>2. Our representations are divided into three areas – procedural; site specific and evidence base.</p> <p><b>Procedural Matters</b></p> <p>3. As noted above the subject site was promoted through the Councils 'Call for Sites'.</p> <p>The site was submitted as a potential housing site through this process in December 2018. Despite being advised that feedback would be provided to this process none has been received and there is nothing in the evidence base for the draft local plan that provides any detail as to whether this site was either assessed and if it was the outcome of such assessment.</p> <p>4. We consider that this is a significant flaw in the evidence base behind the current draft local plan.</p> <p>5. The Council published the draft local plan for consultation on 4th January 2021.</p> <p>However, there were important areas of the evidence base that were not published in a simultaneous manner. This included a document entitled 'Housing and Economic Land Availability Assessment- January 2021'. It has been said that the draft plan is underpinned by the evidence base.</p> <p>6. However, this document, that extends to 17 pages, was not published until 8<sup>th</sup> February 2021, only three weeks before the end of the consultation period on the draft local plan. This is significantly short of a standard six week consultation period. It also fails to address the shortfall in information noted above. It refers to the 'Call for Sites' and the number of sites considered and allegedly assessed but provides no detail on these matters.</p> <p>7. Again the late publication of this important aspect of the evidence base is also considered a significant flaw in what should be the transparent nature and soundness of the local plan production process. There is no analysis as to why some sites have been promoted through allocations in the draft local plan and others have not.</p> <p>8. In both these respects we consider that this Regulation 18 version of the draft local plan is unsound.</p>	Land to the southside of Fawe Park Road is a designated SINC. Consequently, it is inappropriate to promote as a site allocation within the Local Plan	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
AJDK	AJDK	Katie Gwilliam	Planner Rolfe Judd Planning	1056	Proposed Site Allocation	<p>See comment 1055 for attachment with full response</p> <p>Pre-Publication Draft Policy LP4 (Tall Buildings)</p> <p>Wandsworth's Pre-Publication Draft Local Plan Policies Pre-Publication Draft Policy LP4 (Tall Buildings)The general principle of this policy is supported by our Client. The policy recognises that proposals for tall buildings may be appropriate in locations identified in the Tall Buildings Map, as shown in Appendix 2 of the Pre-Publication Draft Local Plan. Of which there are two types of tall building areas identified; (1) 'Opportunities for tall building clusters and/or landmarks' and (2) 'Opportunities for tall buildings within town centres and along strategic routes', subject to the development not resulting in any adverse visual, functional, environmental and cumulative impacts.</p> <p>In accordance with the Publication London Plan Policy D9 (Tall Buildings) requirements, the Council has identified parts of the borough which are appropriate for tall buildings, by creating sub-areas with corresponding prevailing heights, and specific heights that would be defined as a 'Tall Building' for that sub-area.</p> <p>The site at 214 Upper Richmond Road is identified for 'Opportunities for tall buildings within town centres and along strategic routes' (highlighted in orange below), and is located within sub-area D1, where the prevailing heights are 3-4 storeys. A tall building in this sub-area is 6-storeys or higher, and any proposal which meets or exceeds 6-storeys will be subject to a 'Tall Buildings Assessment'.</p> <p>Our Client's site at 214 Upper Richmond Road is currently 5-storeys, which is above the 3-4 storey prevailing heights in sub-area D1 but is still 1-storey lower than what is defined as a 'tall building'. For properties below prevailing heights and/or below 6-storeys, this policy potentially allows new additional floorspace to come forward on existing sites and where appropriate, creates an opportunity for the complete redevelopment of sites for higher density development that will support the viability of town centres. In light of these considerations, our Client supports the Council's decision to include the site within sub-area D1 and the proposed designated 'Opportunities for tall buildings within town centres and along strategic routes'.</p> <p>Pre-Publication Draft Policy LP4 is also considered to be consistent with the objectives of the NPPF (2019) and the Publication London Plan (2020) in regards to making efficient use of land. Under Paragraph 11 of the NPPF (2019) it states that decisions should promote and make as much use from previously-developed or suitable 'brownfield' land to meet the identified need for new homes, particularly where land supply is constrained and available sites can be used effectively. Notably, Part e) of Paragraph 118 states that planning policies and decisions should support opportunities to use the airspace above existing residential and commercial uses for new homes. In addition, to achieve appropriate densities, the NPPF states Local Planning Authorities should support development that makes efficient use of land, taking into account local market conditions and viability, the desirability of maintaining an area's prevailing character and setting or promoting regeneration and change, and securing well-designed, attractive places.</p> <p>This is also mirrored at the Strategic Policy level, whereby Publication London Plan Policy GG2 on 'Making the best use of land' identifies that London's population is set to grow from 8.9 million today to around 10.8 million by 2041. Furthermore, it states that developments must proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher</p>	<p>Support noted.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>density development, particularly in locations that are well-connected to jobs, services, and public transportation.</p> <p>In light of the above, Draft Policy LP4 is considered to be consistent with the objectives of the NPPF (2019) and the Publication London Plan (2020) on tall buildings. Our Client fully supports the Council's future aims and objectives through this Draft Policy, which will help landowners, developers and other key stakeholders to have the flexibility in future to optimise sites in delivering a mix of town centre uses, including new commercial floorspace, leisure and entertainment uses, and new housing; taking into consideration visual, functional, environmental and cumulative impacts.</p>		
AJDK	AJDK	Katie Gwilliam	Planner Rolfe Judd Planning	1055	Proposed Site Allocation	See attachment for details on proposed site allocation within Putney.	The London Plan identifies a target for the provision of an additional 58,000 bedrooms of serviced accommodation by 2041, with a focus on both leisure and business visitors. This policy therefore seeks to both promote the provision of new visitor accommodation in appropriate locations and resist the loss of existing visitor accommodation where it continues to meet an identified demand. The policy position is consistent with the London Plan which states that 'a sufficient supply and range of serviced accommodation should be maintained'. The revised policy is more flexible as it also allows for the net loss of bed spaces where the proposed development is in a predominantly residential area and would re-instate an original residential use, or where the existing use has significant negative effects on residential amenity. It is however agreed that marketing evidence might not always be necessary to demonstrate that there is no longer demand for existing visitor accommodation.	Policy LP35 (now LP46) revised to not require the submission of marketing evidence in order to demonstrate that there is no longer a demand for the visitor accommodation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Anna Russell-Smith	Senior Planner Montagu Evans	1256	Proposed Site Allocation	<p><b>See attachment for full representation</b></p> <p><b>Pre-publication Local Plan – January 2021</b></p> <p>The following sections respond to specific policies outlined within the London Borough of Wandsworth (LBW) draft prepublication Local Plan.</p> <p>Removal of Springfield Hospital Allocation Ref:89</p> <p>The draft Local Plan does not seek to retain the existing Springfield Hospital Allocation. Whilst the Site benefits from outline planning permission, which was granted in 2012, the Site is at a relatively early stage of development specifically in relation to the delivery of housing on the Site. As such, there are still a number of Reserved Matters Applications and phases to be brought forward for development.</p> <p>The planning context has evolved since planning permission was first granted and there is a far greater emphasis on accommodating London's housing needs – which is now all the more important given the Council's increased target in the new London Plan (increased from 1,182 to 1,950 per annum).</p> <p>To date reserved matters applications for the early phases have demonstrated that there is scope to optimise the housing yield of the site and to make the most of this one-off development opportunity.</p> <p>Based on that experience, there may well be opportunities to optimise future housing parcels and make an important contribution to meeting Wandsworth's housing needs, including the need for affordable housing.</p> <p>It may be the case that if the originally-approved number of dwellings is exceeded as reserved matters are brought forward, a new planning application would be submitted. If so, and if only the Metropolitan Open Land designation were to remain, there could be a strong presumption against development even though it has already been accepted (by way of the previous planning permission) that some development on the MOL would be acceptable. If such a situation came to pass it could both harm the coherence of the masterplan and hinder housing delivery.</p>	<p>A large site (of over 33ha) with the potential to deliver over 500 dwellings. Despite its low development capacity, high sensitivity and low PTAL rating of 2, the site is in a prominent location that would benefit from site-specific policy to optimise capacity and secure the best development outcome that retains or expands health facilities. It would also benefit from additional site-specific guidance to ensure the placemaking aims and objectives of the Local Plan are met; particularly around Metropolitan Open Land and heritage.</p> <p>Springfield Hospital, Burntwood Lane/Glenburnie Road should be included as a site allocation.</p>	Site Allocation added to Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>We therefore respectfully request that a site allocation be retained on the whole or part of the site to facilitate the completion of the approved masterplan but in a way which allows for the optimisation of housing delivery.</p> <p>The Council has adopted a similar approach to that which we are advocating in relation to the Ram Brewery (ref:36) allocation, where the boundary of the allocation has been amended to reflect the completion of Phase 1. We ask that the Council adopts a consistent approach and retains an allocation for Springfield Hospital, even if that allocation has an amended boundary.</p> <p><b>Strategic Objectives</b></p> <p>Paragraph 20 of the NPPF states that Strategic Policies should set an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure for transport, community facilities and the conservation and enhancement of natural, built and historic environment.</p> <p>Paragraph 23 goes on to identify Strategic policies should provide a clear strategy for bringing land forward, at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies).</p> <p>The draft Local Plan sets out a number of strategic objectives which will be achieved by 2038. The strategic objectives relevant to our client include, but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Wandsworth will be a borough of opportunity supported by its attractive and distinctive neighbourhoods, connected by parks, commons, open spaces and its riverside. There will be an enhanced range of local services which increase opportunities for social interaction, with people living active, healthy, safe, fulfilled and independent lives. The five existing distinct town centres at Clapham Junction, Wandsworth, Putney, Tooting, Balham, together with the new town centre at Battersea Power Station, will play a key role supported by the borough's local centres.</li> <li>• Social integration, supporting social mobility and enabling all of the borough's residents to achieve their potential will be at the heart of everything we do. We will have tackled pockets of deprivation, including in Battersea, Tooting and Roehampton, through regeneration activities and secured new employment and training opportunities for local people.</li> <li>• We will have responded to the housing, environmental, service and infrastructure needs of Wandsworth's existing and new residents and businesses by balancing certainty with flexibility within the Plan, recognising that these needs will change over its lifetime.</li> <li>• The borough's important stock of family-sized homes will have been retained and their local neighbourhoods enhanced. We will have supported the delivery of a significant number of new homes of high quality and sustainable design to meet the needs of local people. We will have delivered a range of homes, including a diversity of affordable home offers, to suit the needs of a diverse range of households, from young professionals to older people, families of all ages, and valued key workers who will be looking to either rent or buy so that they can live in the borough.</li> <li>• The borough's heritage assets, such as the iconic Battersea Power Station, Ram Brewery and Springfield Hospital will have been protected and enhanced.</li> </ul> <p>SWLSTG supports the Council's vision to be a borough of opportunity supported by its attractive and distinctive neighbourhoods, connected by parks, open spaces and its riverside by 2038. The drive to include opportunities for</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>social interaction with people living an active, healthy, safe, fulfilled and independent life by 2038 is fully supported by SWLSTG and SWLSTG looks forward to working with the LBW to achieve these objectives. The Council's social objectives relating to social integration, supporting social mobility and enabling the borough's residents to achieve their potential is also supported.</p> <p>Further commentary on the Council's housing objectives are set out below however the Council's commitment to support the delivery of a significant number of new homes of high quality and sustainable design is welcomed. SWLSTG further supports the delivery of a range of housing and the Council should be reminded of delivering homes for key workers that support and work for the NHS.</p> <p>SWLSTG welcomes the identification of Springfield Hospital as an iconic heritage asset within the Borough and aligns with the importance of protecting and enhancing this heritage asset. This further accords with the requirements of both the NPPF and the new London Plan. The Springfield Hospital consortium have and will continue to bring forward development on the Site that protects and enhances the heritage asset of both Springfield Hospital itself and the Historic Parks and Gardens associated with the Hospital.</p>		
All England Lawn Tennis Club		Emily Cochrane	Associate Rolfe Judd Planning	1265	Proposed Site Allocation	See attachment for full representation regarding the Wimbledon Park Golf Club.	<p>Wimbledon Park Golf Club is located immediately to the east of the main All England Lawn Tennis Club (AELTC) site along Church Road. The northern element of the site is within the administrative boundary of the London Borough of Wandsworth (LBW), with the remaining within the London Borough of Merton (LBM). The current existing use of the site is for a golf course. The LBM has allocated the Wimbledon Park Golf Club, in combination with the main AELTC site, to support it as a sporting venue of national and international significance.</p> <p>Site allocations in LBW are not intended for the promotion of sporting venues. Consequently, it would be inappropriate to designate the site as such. However, proposals for the area within LBW will be assessed against the development plan.</p> <p>Wimbledon Park Golf Club, Church Road does not require site allocation.</p>	No change to the Local Plan required as a result of this representation.
Royal Borough of Kensington and Chelsea Pension Fund	RBKC Pension Fund	Mr Joe Wilson	CBRE Ltd	1223	Proposed Site Allocation	See attachments for full representation and feasibility study for the proposed site.	<p>The site extends to approximately 0.23ha. Despite this, its prominent location within the town centre suggests the site would benefit from site-specific policy to promote investment, optimise capacity and secure the best development outcome with a particular opportunity for intensification. It would also benefit from additional site-specific guidance to ensure the placemaking aims and objectives of the Local Plan are met.</p> <p>The site is located within a town centre and has a PTAL rating of 6b. It has a medium sensitivity and a high development capacity with a projected yield of 70 dwellings.</p> <p>36-46 St John's Road and 17 Severus Road, Clapham Junction should be included as a site allocation.</p>	Site Allocation added to Local Plan
Cyril Richert	Clapham Junction Action Group			1672	Proposed Site Allocation	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>Site Allocation: Territorial Army Centre, 27 St John's Hill.</p> <p>The Clapham Junction Action Group propose that the Territorial Army centre site should be added as a new site allocation.</p> <p>The Territorial Army premises sit between the listed Grand Theatre (equivalent to 4 storeys) and the Peabody Estate (soon to be up to 12 storeys). Whilst we acknowledge that the state of the buildings is poor, it gives an opportunity for a comprehensive development. However, we consider that any application here would need, amongst other things, "preserve" and "enhance" the surrounding area's character, and its massing and scale would have to be "well integrated into the surrounding development".</p> <p>It should specifically highlight</p>	<p>This site fulfils the majority of requirements for allocation. However, the potential to address the scoped sustainability objectives; particularly:</p> <ul style="list-style-type: none"> <li>• Conserve and where appropriate enhance heritage assets and their settings, and the wider historic environment.</li> <li>• Enhance the benefits to all from biodiversity and ecosystem services and establish and retain inter-connected multifunctional green infrastructure.</li> <li>• Minimise flood risk in the borough and elsewhere and promote the use of SuDS.</li> <li>• Provide more housing opportunities for Wandsworth residents and workers.</li> <li>• Ensure people have access to essential community services and facilities, including open space.</li> <li>• Address Council aspirations within priority neighbourhoods.</li> <li>• Protect and improve public health.</li> <li>• Encourage the growth of sustainable transport.</li> <li>• Reduce the need to travel.</li> <li>• Provide employment space to meet the borough's needs.</li> </ul> <p>Are not enhanced by allocation beyond the requirements set out across the Plan's policies and development is not likely to make a significant contribution towards meeting the borough's development needs. Consequently, the site at the Territorial Army Centre, 27 St Johns Hill, Clapham Junction does not require site</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>– conservation of historic part of the site (including frontage)</p> <p>– tall buildings will be resisted in this location and heights should match those of the current building fronting St John's Hill up to the junction.</p> <p>We have been requested the addition of this site allocation since 2013 in previous consultation36 . At the time, the response from planners was:</p> <p>Whilst acknowledging that the TA centre is of a size (approx. 0.4ha) that would warrant consideration of inclusion as a separate site within the SSAD it was never brought to the Council's attention in the early stages of the plan preparation period. As there wouldn't be any consultation on this potential new site there would be no opportunity for public comment and therefore it is considered too late in the plan process to add a further site.</p> <p>We note that this time, there will be a further opportunity to view and comment on the final draft version of the Local Plan later this year and therefore no reason for not adding this site.</p> <p>We support comments from LavenderHillForMe community forum, especially:</p> <p>Certain preferred approaches to movement, such as providing for pedestrian site permeability through to the adjacent Peabody development, may be a very desirable consideration at this stage, to ensure that ongoing development plans at both this site and the adjacent sites can be undertaken in a joined-up and holistic way.</p>	allocation as it can be adequately brought forward for development against the policy framework of the Plan.	
	Lockguard Ltd	Mr David Shiels	Associate DP9	1644	Proposed Site Allocation	<p>Dear Sir/Madam</p> <p><b>WANDSWORTH DRAFT LOCAL PLAN</b></p> <p><b>PRE-PUBLICATION REGULATION 18 CONSULTATION VERSION (NOVEMBER 2018) SUBMISSION OF WRITTEN REPRESENTATIONS</b></p> <p>On behalf of our client, Lockguard Ltd, we submit the following written representations in respect of the Wandsworth Draft Local Plan Pre-Publication Regulation 18 Consultation Version, published November 2018 ('Draft Local Plan').</p> <p>Our client is the freeholder of The Glassmill, 1 Battersea Bridge Road, London, SW11 3BZ ('the Site'), and therefore has a keen interest in the direction of emerging Local Plan policy and site allocations, as well as the Council's objectives for residential and employment land within the borough.</p> <p><b>Draft Site Allocation</b></p> <p>The Draft Local Plan includes a number of site allocations which are proposed to replace the current site allocations within the adopted Site-Specific Allocations Document (March 2016). At present, the Site is not allocated for redevelopment in the Draft Local Plan.</p> <p>The Site is located within the designated Area Strategy for Wandsworth's Riverside, as detailed in Draft Policy PM9. The Draft Policy notes that whilst much of the riverside between Wandsworth and Battersea Parks has been redeveloped, a number of sites in the area present opportunities for targeted growth. It is considered that the Site presents an excellent opportunity for growth through wholesale redevelopment, which should be recognised through a site allocation in the Draft Local Plan. The site allocation would assist in bringing forward the residential-led redevelopment of an underutilised brownfield site in a highly prominent location adjacent to the river. Owing to its position at a key gateway into the borough, it is considered that the Site would be a suitable location for delivery of a tall building, in line with Draft Policy LP4.</p>	<p>The site extends to approximately 0.23ha and has a PTAL of 3 which does not place it in a highly sustainable location. Due to the recency with which the existing building was developed it is considered to be unsustainable to allocate the site for redevelopment.</p> <p>As well, it is considered that the Local Plan policies provide sufficient guidance if any proposals were to come forward.</p> <p>The Glassmill, 1 Battersea Bridge Road does not require a site allocation.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>In terms of site capacity, it is considered that the Site could support approximately 150 residential units, alongside the provision of commercial uses, providing a significant contribution towards the Council's housing and employment targets. The allocation of the Site for residential use would be consistent with a number of wider the Draft Local Plan objectives, including Draft Policy LP24, which states that the Council will provide for the delivery of minimum of 1,950 new homes per year by 2028/2029, with these new homes delivered by, inter alia, the development of sites as allocated through the Draft Local Plan. Additionally, Part A of Draft Policy PM9 acknowledges that new residential accommodation in Wandsworth's Riverside will help meet the borough's housing target, with development in this area expected to provide at least 3,210 homes over the entire plan period to by 2037/38.</p> <p>The Site is also located within a designated Focal Point, where Part C of Draft Policy PM9 seeks to promote residential-led development, alongside a mixture of uses to increase activity and vibrancy along the riverside and new development which creates a positive front to the water, with active ground floor uses and continuation of the public riverside walk.</p> <p>It is therefore considered that the Site should be allocated in the Draft Local Plan for residential-led development to provide circa 150 residential units, with potential for commercial uses at ground floor level and improved pedestrian links, in line with the above draft policies. The site allocation should also recognise that the Site is suitable for the delivery of a tall building, in accordance with Draft Policy LP4, as addressed below.</p>		
Katie Brown	Development Planning Manager Network Rail			1737	Proposed Site Allocation	<p>See attachments on comment 1734</p> <ol style="list-style-type: none"> <li><u>Fawe Park Road, Putney</u></li> </ol> <p>Network Rail has been releasing land for development for over a decade through successful partnerships with both the public and private sectors to deliver for the railway and for Britain. As part of our portfolio development we have been working closely with Northport Property Limited to potentially redevelop the site known as Fawe Park Road, Putney into residential use (see Appendix for site plan).</p> <p>Alongside many other public bodies, Network Rail has been requested by Government to contribute towards set housing targets. As a result, Network Rail has committed to unlocking land to deliver 12,000 homes across more than 150 sites by the end of the financial year with further targets to be agreed beyond April 2020. From recent feasibility studies it is expected that redeveloping the Fawe Park Road site would provide approximately 78 units that would contribute towards these Government housing targets. Network Rail therefore request that the site known as Fawe Park Road is allocated for residential purposes as part of the Local Plan for the London Borough of Wandsworth.</p> <p>Network Rail welcome further discussion on the redevelopment of this site for residential purposes as well as other sites throughout the Borough.</p>	Land to the southside of Fawe Park Road is a designated SINC. Consequently, it is inappropriate to promote as a site allocation within the Local Plan	No change to the Local Plan required as a result of this representation.

## Chapter 4 – Area Strategy for Wandsworth Town

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Tony Burton	Wandle Valley Forum			1739	4.1	<p>Whilst welcoming explicit recognition of the Wandle Valley in the Wandle Valley Area Strategy 10 and Wandsworth Town Area Strategy 2 we believe the Wandle should be more of a centrepiece of the new Wandsworth Local Plan. The strategic opportunity provided by the Wandle is addressed in only a limited way in the Plan's lengthy Vision to 2038 and mainly through its economic role. It is worryingly absent from the Plan's environmental, social and economic objectives.</p> <p>That part of the Wandle which is in the Wandle Delta will be addressed through the emerging Wandle Delta Masterplan. We believe the rest of the Wandle should also be the focus of its own Masterplan and this will support delivery of Area Strategy 10.</p> <p>This Masterplan should be identified in Policy SS1.</p> <p>The Plan also needs to contribute to a consistent approach in Merton, Sutton and Croydon which share the Wandle. This requires a mechanism to ensure wider co-operation with neighbouring local planning authorities.</p>	<p>The Wandle Valley area forms an important part of the Plan. This is demonstrated by including the Area as an Area Strategy for both the Wandle Valley and for Wandsworth Town which provides a key focus to the Wandle Delta Area. The recently published Wandle Delta Masterplan SPD, which forms part of the overall suite of planning documents contains much detail on the Wandle Delta area of the Wandle Valley thereby giving the area increased importance and has addressed several of the comments made in the representation. The Wandle Delta Masterplan SPD also gives further detailed guidance complementary to the placemaking policies PM 2 and PM 10.</p> <p>Support welcomed. The opportunities of the Wandle Valley and the River have been included within the associated Placemaking policies and vision for the Wandsworth Town Area Strategy.</p> <p>Comment noted. However, it is considered that a Wandle Valley Masterplan is not a priority and that the Policies set out in the Reg 19 Plan establishes an appropriate level of design and development principles for the area at this time.</p> <p>The Duty to Co-Operate process requires cooperation and consultation between neighbouring boroughs and this has been achieved with Merton as part of the Local Plan Process. The Plan has been produced taking into account the aims of the Wandle Valley Regional Park and acknowledges that ongoing work will continue with the Trust and other key stakeholders.</p>	No changes considered necessary to the Local Plan
Dr John Fletcher				533	4.3	<p>for points 4.3-4.9. Wandsworth town is horrendous, and I have no idea how you gave it a 3 for active transport. From Tooting I can just about reach it with the children on bicycles by using the Wandle Trail (I have to go through the centre of Earlsfield, which is pretty awful though), but to go through it I have to cross the gyratory which may as well be a crocodile infested river, not once but twice. We've never been to Battersea or Putney as a result.</p>	<p>The place performances are qualitative assessments of each spatial area that has been considered for the Local Plan. The results have been informed by an online consultation survey conducted as part of the Urban Design Study and internal consultations with key stakeholders.</p>	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1642	4.3	<p>See attachments on 1615 for more detail</p> <p><b>Section 2 - Site allocations</b></p> <p>Flood risk</p> <p>Please see our comments relating to specific sites from our recent correspondence about the Level 2 SFRA.</p> <p>In general, site design should comply with our flood risk comments raised above relating to set back from flood defences and main rivers, raising defences in line with The Thames Estuary 2100 Plan, floodplain compensation and setting finished floor levels to ensure developments are kept safe for their lifetime and do not increase flood risk elsewhere.</p> <p><b>Biodiversity</b></p> <p>Please refer to our comments under the area specific policies for site specific recommendations.</p> <p>In general, site design should ensure a set back from main rivers and introduce naturalised river banks whilst maintaining the level of flood defence. This can be achieved through the riverside strategy approach and considering the Estuary Edges guidance. We also require aquatic Biodiversity Net Gain to be achieved on sites adjoining rivers.</p>	<p>Comments noted. Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.</p> <p>LP60 River Corridors has also been amended to mention Estuary Edges as a consideration for any development along the River Thames. It is important to help improve biodiversity by softening the hard banks on tidal river corridors.</p> <p>Any development in close proximity to waste sites would be required to be in accordance with Policy LP 14 (Air Quality, Pollution and Managing Impacts of Development) and LP 13 (Waste Management). It is not considered necessary to cross reference the relevant site allocations to these policies nor is that a consistent approach for other policies which may also need to be considered.</p> <p>LP57 Biodiversity requires Biodiversity Gain on all major developments.</p>	Policy LP 60 has been amended to incorporate the Council's response.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>Waste sites</b></p> <p>Any proposed developments in close proximity to existing or proposed waste sites should incorporate mitigation measures for poor air quality, noise and vibration pollution as requested in Policy LP14 'Air Quality, Pollution and Managing Impacts of Development'.</p>		
Ms Susan Jones				406	4.6	Yet more high-rise buildings, on the sites of the former B&Q and Homebase, therefore yet more people, and still not enough provision of extra green space and play areas.	New developments will be required to provide additional play space and green space via multiple policies LP19 Play Space, LP20 New Open Space, and LP59 (now LP57) Urban Greening Factor.	No change to the Local Plan required as a result of this representation.
Ms Susan Jones				405	4.7	The Riverside Quarter development has resulted in a huge increase in the number of people living in the area. With the exception of a very small children's play area, no additional green space has been provided and there is still building going on there. If Wandsworth Council want us to take their claim to be a green borough seriously, then this failure must not be repeated in the further development of the Wandsworth Town area.	The draft Local Plan will require new developments to provide additional play space and green space via multiple policies LP19 Play Space, LP20 New Open Space, and LP59 Urban Greening Factor.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			160	4.9	Note: disagree that these are barriers to active travel - there is significant space allocated to roads and pedestrian footways which navigate across the railway and Gyratory, but only extremely limited provision for safe cycle space	The Council's objective is to improve the built environment for all forms of active travel, and this will be elaborated on more in the Walking and Cycling Strategy.	No change to the Local Plan required as a result of this representation.
Dr John Fletcher				535	4.18	<p>I am supportive of these commitments, but what is the actual plan? It has been 7 years.</p> <p><a href="https://consultations.tfl.gov.uk/roads/wandsworth-town-centre/">https://consultations.tfl.gov.uk/roads/wandsworth-town-centre/</a></p> <p><a href="https://consultations.tfl.gov.uk/roads/wandsworth-town-centre-2014/">https://consultations.tfl.gov.uk/roads/wandsworth-town-centre-2014/</a></p>	The Wandle Delta Masterplan is expected to come forward in Summer 2021.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			679	4.19	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme. In the uses section the wording should be corrected to read: 'A section of the <u>western</u> and northern part of this site is required...' The land in question should be excluded from any built form and secured at nil cost to TfL as part of any relevant planning permissions on the site.	WT1 has been amended to reflect the comment.	Development Consideration Uses (3) amended to clarify that a section of the western and northern part of the site is required for the Wandsworth Gyratory Scheme.
	Chelsea Cars	Mark Westcott	Associate Director HGH Consulting	1691	4.19	<p><b>See attachment for full context</b></p> <p>WT1: Chelsea Cars and KwikFit (site allocation)</p> <p>The continued allocation of the site for residential-led development is strongly supported, yet further clarification and detail on specific aspirations for this site are required. The site provides an opportunity to redevelop this corner site and integrate Armoury Way and the wider Wandsworth area into the heart of the town centre, including the Ram Quarter and Southside Shopping Centre. As it is currently worded, this draft allocation will constrain the redevelopment of the site to its full potential and therefore fail to optimise the capacity of this important regeneration opportunity.</p> <p>Firstly, the draft allocation requires:</p> <p>"Redevelopment of the site should provide a mixed use residential and commercial scheme with at least a 25% increase in the amount of economic floorspace..."</p> <p>This is considered too onerous particularly in the context of the challenges being faced by town centres, not least as a result of the pandemic. To protect the longevity of this policy, this part of the draft allocation should be revised to include an ambition to retain economic/active ground floor uses as appropriate where it can add to a sustainable and viable mixed-use approach for the site to account for 'market conditions at the time of any application submission'.</p>	<p>Support for the continued allocation of the site is noted.</p> <p>This site is one of the few in Wandsworth town centre with capacity to provide a significant increase in economic floorspace, and consequentially was designated as an Economic Use Intensification Area (EUIA) in the Local Plan Employment and Industry Document (2018). These are areas that have the capacity to provide intensified industrial uses, increased business floorspace, and managed workspace for SME businesses. The Employment land and Premises Study (2020) confirms that Wandsworth still has a need for additional economic floorspace, including industrial space, and it is considered that this site has excellent potential to accommodate SME businesses in the cultural sector. This would bring vibrancy and vitality to the location without competing (indeed complementing) the provision of retail and leisure activities within the designated frontages in the town centre.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>This revision will stand a better chance of protecting an appropriate amount of economic floorspace at the site (in line with draft policy LP36: Promoting and Protecting Offices), but also protect against the creation of floorspace that cannot be occupied and that will fail to activate the ground floor frontages (contrary to draft policy LP1: Urban Design).</p> <p>It is noted that the site is located within but on the edge of the Town Centre boundary (as identified by the draft Policies Map). Rather than required the increased provision in edge of centre locations, it is prudent to target economic development towards the more central Town Centre locations with core shopping frontages (as defined by Map 19.1 of the draft Local Plan), such as The Ram Quarter and Southside Shopping Centre. The focused creation of economic floorspace in the centre of the Town Centre will boost vibrancy and activity within this central location.</p> <p>Secondly, the reference to tall buildings within this draft allocation is considered to be inconsistent with the NLP and NPPF policies in regard to optimising site capacity through a design-led approach. The NLP requires all development to make the best use of land to optimise the capacity of sites, including site allocations (policy D3). Whilst NLP policy D9 defines tall buildings as '6 storeys or 18 metres measured from ground to the floor level of the uppermost storey', the policy continues and outlines that tall buildings are appropriate in principle, taking account of:</p> <ul style="list-style-type: none"> <li>• The visual, functional, environmental and cumulative impacts of tall buildings;</li> <li>• Their potential contribution to new homes, economic growth and regeneration; and</li> <li>• The public transport connectivity of different locations.</li> </ul> <p>Given the site's location within the Town Centre boundary and the site's high PTAL range between 6a and 4, the draft allocation should reflect the NLP policy D3 and D9 with the site's identification as an appropriate location for a tall building. This is supported by draft policy LP45(E) and development in town centre locations and the criteria set out by the Urban Design Study (December 2020) (the Study), which states that in location G1: Wandsworth Town and Riverside, "tall buildings may be more suited to corner plots to response to the scale of adjacent junctions, which also including an active uses and frontages at ground level where appropriate".</p> <p>The scale of any redevelopment of the site should not be constrained by overly restrictive policy requirements that will adversely impact on viability and most likely deter any development proposals from coming forward. Instead, the scale of development should be optimised, given the site's central urban location, with the focus being on design quality and placemaking.</p> <p>In line with the above, Chelsea Cars seeks the amendment of the draft site allocation, removing the too restrictive reference to the increase in economic floorspace and the limitations proposed for building heights. Greater flexibility in the allocation would better reflect the positive contribution any redevelopment could have for the Wandsworth Town area through the delivery of a viable and well designed scheme.</p>		
	Wandsworth Cycling (London Cycling Campaign)			165	4.31	"with provision for a riverside walk" to read "with provision to accommodate both walking and cycling riverside"	Comment noted. PM2 People First D outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists. Measures to improve connectivity will be complemented by the provision of additional cycle parking in key locations and in association with development at growth locations including through the use of signage. This is considered sufficient as it covers all site allocations.	No change to the Local Plan required as a result of this representation.
Emma Broadbent	London Rivers Officer South East Rivers Trust			257	4.31	<p>Site Allocations: WT2 Ram Brewery/Capital Studios</p> <p>We welcome the acknowledgement that buildings adjoining the riverside walk should not cause unreasonable overshadowing of the river or harm to the existing biodiversity value but would strongly urge for the design requirements to include a defined distance between the development and the banks of the River Wandle to allow for ecological processes in the riparian zone.</p>	<p>LP60 explains that the biodiversity value of the borough's blue infrastructure assets will be protected and enhanced including that of the River Thames, River Wandle and Beverley Brook which will apply to all site allocations.</p> <p>LP12 Water and Flooding is considered to comprehensively account for all the riverside needs there the Wandle Catchment Plan will not be included.</p>	Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The design principles for this site do recognise the importance of improving its wildlife value but it is apparent that they do not take into account the importance of the zone of land bordering the River Wandle (the riparian zone), without which the biodiversity potential of the river will be limited. The plan recommends that 3m be left for a riverside walk but fails to realise that this land is also required for ecological function.</p> <p>We would recommend ideally requiring 30m for ecological functioning in all riverside development but acknowledge that this may not be feasible in such a built-up environment, in which case we recommend not less than 10 m be left between development and the river bank. The materials used for the riverside walk should be carefully selected so that they facilitate ecological interactions across the river bank buffer zone and do not present a barrier to wildlife.</p> <p>The design requirements note that substantial improvements to the river channel will be expected. We would like to see a requirement for the development and associated river enhancements to contribute to the delivery of the Wandle Catchment Plan, to ensure that there is no detrimental impact to the ecological functioning of the river and improvements to biodiversity value are maximised.</p> <p>We would encourage the incorporation of a Sustainable Urban Drainage System (SUDS) into the design requirements of the site this should include the use of permeable outdoor surfaces and green roofs to attenuate water flow from the site to the River Wandle. Particular consideration should be given to the pollutants that may arise from the site, both during its construction and operation, including the deposition of pollutants associated with road traffic which will be washed off surfaces during periods of rainfall, the urban pollutants reaching the River Wandle should be minimised through SUDS, e.g. passing runoff water through retention ponds to remove pollutants before it enters the river.</p>	Policy LP12 Water and Flooding provides detailed guidance with regards to Sustainable Urban Drainage Systems which applies to all site allocations.	
Josephine Vos	Transport for London			680	4.31	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme and that this has been included in planning permission reference: 2012/5286.If any revised applications are submitted for the site, the land required for the gyratory should be secured at nil cost to TfL.	Comment noted.	No change to the Local Plan required as a result of this representation.
Spencer Jefferies	Town Planner National Grid	Matt Verlander	Director Avison Young	1687	4.31	<p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p>Policy WT2: Ram Brewery/Capital Studios/ Former Dexion / Duvall site, Ram Street / Armoury Way,SW18</p> <p>0Kv Underground Cable route: KENSAL GREEN -WIMBLEDON 2</p> <p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p>	Comment noted. The attached plans do not appear to show National Grid assets in Wandsworth.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			167	4.39	"should be 3m" revise with "is required to be a minimum of 3m and to accommodate both walking and cycling"	Policy LP54 Public Transport and Infrastructure (B) provides additional detail for all riverside walks which set the 3m requirement as a minimum and where possible allow for provision of cycling, ensuring pedestrian safety.	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1027	4.43	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p>	Comment agreed.	<p>The site allocation name and site cluster name have been changed to reflect the comment.</p> <p>Amend to read: •WT4 Gasworks Site, Armoury Way, SW18</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>WT4 Hunts Trucks/Gasholder Cluster – OBJECT</p> <p>Site name - It is unclear why Gasworks site is referred to as "Hunts Trucks". This name is personal</p> <p>to a previous occupier, who no longer is in situ and has not been for many years. The term "Hunts Trucks" should be removed from the Reg 18 Plan.</p>		
Emma Broadbent	London Rivers Officer South East Rivers Trust			258	4.44	<p>Site Allocations: Hunts Trucks/ Gasholder Cluster</p> <p>As above, consideration needs to be given to the importance of the riparian zone and we would recommend not less than 10m is left between the development and the river bank. The materials used for the riverside walk should be carefully selected so that they facilitate ecological interactions across the river bank buffer zone and do not present a barrier to wildlife.</p> <p>The new bridge to Dormay Street and the new footbridge further north near the railway should be designed and constructed in such a way that minimises shading of the river and does not negatively impact the ecological functioning of the river.</p> <p>We would encourage SUDS to be listed within the design requirements, as detailed for the Ram Brewery.</p> <p>We would like to see a requirement for the development and associated river enhancements to contribute to the delivery of the Wandle Catchment Plan.</p>	<p>Policy LP12 Water and Flooding provides detailed guidance with regards to Sustainable Urban Drainage Systems which applies to all site allocations.</p> <p>LP12 Water and Flooding is considered to comprehensively account for all the riverside needs there the Wandle Catchment Plan will not be included.</p>	<p>Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.</p> <p>The site allocations movement requirements have been amended.</p>
Josephine Vos	Transport for London			681	4.44	<p>TfL welcomes the reference to land being required for the Wandsworth gyratory scheme and that development should not prejudice its delivery. The land in question should be excluded from any built form and secured at nil cost to TfL as part of any relevant planning permissions on the site. Any access for vehicles and servicing should be from Smugglers Way. TfL welcomes the requirement for the site to be car free.</p>	<p>The costs of the project are not considered to be a Local Plan matter.</p> <p>This is already captured by LP53 Parking, Servicing and Car Free Development.</p>	<p>Paragraph 4.52 has been amended to remove the requirement for a development to be car free in terms of parking.</p>
Kin Development		Ben Ford	Director Quod	1028	4.44	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p>Site Allocation - Gasworks sites form an integral part of London Plan Policy H1 (LPH1) Increasing housing supply. To ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans and planning decisions, especially through 6 sources of capacity – surplus utility sites are specifically referenced at part (d). Footnote 59 of the London Plan explicitly recognises that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. Due to these abnormal costs, the London Plan promotes an adjusted affordable Fastrack approach of 35%.</p> <p>The London Plan also recognises that the principle of no net loss of floorspace capacity (the Secretary of State has removed this strategic test) does not apply to sites used for utilities infrastructure which are no longer required. This is because of the challenges of delivery due to the abnormal costs. There is no expectation of industrial capacity from Gasworks sites.</p> <p>The approach to industrial floorspace is also explicit within the Wandsworth's adopted Local Plan (2018) (Site Allocation Hunts) which allocates the site for mixed use development including residential and economic uses. It confirms that the gas holder itself and the supporting infrastructure should be excluded from the calculation of industrial floorspace provision.</p> <p>The requirement to increase the amount of floorspace on site should refer to the 'existing' floorspace on site to make the policy effective. The Reg 18 Plan now includes office floorspace within the 25% uplift which we consider unnecessary, especially as the Economic Use Intensification Area (EUIA) designation requires net replacement.</p>	<p>The potential contribution of this site to meeting the housing target and providing affordable housing is not disputed.</p> <p>As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of 8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers. The requirement for the protection and intensification of industrial uses in designated policy areas such as Economic Use Intensification Areas (EUIAs) is therefore considered appropriate.</p> <p>The site allocation within both the adopted Local Plan (LPEID) and the draft new Local Plan identifies that "In calculating the floorspace to be replaced, the gas holder itself and the supporting infrastructure should be excluded". The former requires "at least a 25% increase in the existing amount of industrial (use B1c/B2/B8/SG) and office floorspace (use class B1a)". This is consistent with the adopted and proposed policy approach to Economic Use Intensification Areas (EUIAs). It is agreed that the site allocation should refer to existing floorspace, notwithstanding the comments noted above regarding the need to provide additional economic capacity and the analysis of the Wandle Delta Masterplan SPD.</p>	<p>Amend the site allocation to refer to an increase in the quantum of 'existing' floorspace.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Redevelopment of the site should provide at least a 25% increase in the amount of existing industrial (use classes E/B2/B8/SG) and office (use class E) floorspace		
Ian Harrison	Director Downing	Mrs Jan Donovan	Director Rolfe Judd Planning	1371	4.44	<p><b>See attachment for representation with site boundary and context.</b></p> <p><b>W4 Site Allocation</b></p> <p>Downing is encouraged by the Council's approach to the redevelopment of the wider Site (W4), acknowledging that a masterplan for the site allocation will enable each of the landowners to develop their sites individually whilst delivering the overall aims of the site allocation.</p> <p>Downing are committed to working with the Council and the adjoining landowners in developing a masterplan that can be delivered.</p> <p>With regard to the W4 allocation the Council is seeking considerable public benefits to be delivered via the redevelopment of these sites, notably</p> <ul style="list-style-type: none"> <li>at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) and office (use class E) floorspace, meeting the requirements of the Economic Use Intensification Area (EUIA) designation (excluding the gasholder site and supporting infrastructure).</li> <li>A linear park that incorporates the riverside walk</li> <li>A substantial quantity of housing</li> <li>Innovative use of yard spaces incorporating public-facing elements is encouraged.</li> <li>Some smaller scale town centre uses falling within the E Class uses</li> <li>Reconfiguration of the Wandsworth Gyratory</li> </ul> <p>The draft site allocation whilst noting the site constraints of existing utilities goes on to make recommendations on the site regarding layout and plots of buildings, public access including a riverside walk, permeability through the site, as well as a new footbridge over the Wandle.</p> <p>We note that the Urban Design Study and the tall buildings maps in Appendix 2 identifies W4 allocation as located in an area which has opportunities for tall buildings within town centres and along strategic routes, and the height at which buildings will be considered as 'tall' is 5 storeys.</p> <p>Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.</p> <p>Whilst the allocation includes reference to supporting tall buildings, the height reference is unduly conservative and restrictive to support the redevelopment proposals being sought.</p> <p>Paragraph 123.a) of the NPPF 2020 notes that 'plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant</p>	<p>The development considerations have been updated to consider the impact of contamination on a proposal.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The definition of a tall building has been developed in accordance with the London Plan.</p>	<p>The context development consideration has been amended to reference decontamination and enable and remediation works.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>uplift in the average density of residential development within these areas, unless it can be</p> <p>shown that there are strong reasons why this would be inappropriate...'</p> <p>And</p> <p>Paragraph 127 e) 'optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks'</p>		
Spencer Jefferies	Town Planner National Grid	Matt Verlander	Director Avison Young	1688	4.44	<p><b>See attachment for full context</b></p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p>Policy WT4: Hunts Trucks, adjoining sites including Gasholder, Armoury Way, SW18</p> <p>Electrical Substation: WANDSWORTH HEAD HOUSE0Kv Underground Cable route: KENSAL GREEN -WIMBLEDON 2</p> <p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p>	Comment noted. The attached plans do not appear to show National Grid assets in Wandsworth.	No changes to the Local Plan are considered necessary.
Kin Development		Ben Ford	Director Quod	1029	4.47	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Development Considerations</b></p> <p>The following amendments are proposed to make the site allocation sound.</p> <p><b>Uses</b> [sic] - Proposals on this site <u>must</u> should be brought forward in such a manner as to achieve a comprehensive and integrated approach that supports the urban design, active travel, open space and public realm objectives for the Area Strategy.</p> <p><b>Uses – The site will be optimised for residential uses.</b> The replacement (or additional) economic floorspace should include light industrial workspace for cultural SMEs and office floorspace. <b>Smaller scale town centre uses falling within the E Class use may be acceptable.</b></p>	<p>The Council considers that the requirements set out in 4.47 must come forward and are integral to the success of the site.</p> <p>Agreed. This intention of the second 'Use' clause was to provide further detail on the requirement for cultural SME workspace as part of the light industrial provision on site, however it is recognised that the site allocation identifies that the site is suitable for 'a substantial quantity of housing' and that 'smaller scale town centre uses' and it is appropriate for purposes of clarity to reflect this in the further detail on uses too.</p>	The second 'Use' under development considerations has been amended to identify other uses appropriate on site.
Kin Development		Ben Ford	Director Quod	1030	4.52	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Parking</b> - The site is suitable for the development of a car-free development <b>unless it can be robustly demonstrated otherwise.</b> Car Club provision to support the residential and commercial uses on the site and the surrounding area should be provided.</p>	Comment noted	Paragraph 4.52 has been amended to remove the requirement for a development to be car free in terms of parking. This is already captured by LP53 Parking, Servicing and Car Free Development.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Kin Development		Ben Ford	Director Quod	1031	4.54	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Active Travel</b> - <u>The feasibility of providing a pedestrian and cycle bridge link across Smugglers Way</u></p> <p><u>to the Ferrier Street Cluster should be considered.</u> New connections to the River Wandle riverside walk, including a bridge crossing to The Causeway, will be <b>required desirable</b>. Walking/cycling route links to Wandsworth Town Centre will also be required.</p> <p>Due to the costs of bringing forward a Gasworks site, it is not sound to test unnecessary feasibility studies relating to new bridges across Smugglers Way. The gradient and level change including DDA compliance would result in an undeliverable design which would impair the public realm in this location.</p>	Comment agreed.	References to pedestrian and cycle bridge link across Smugglers Way to the Ferrier Street Cluster have been removed.
Kin Development		Ben Ford	Director Quod	1032	4.55	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Design Requirements</b></p> <p><b>Built Form</b> – Proposals should help create of a more legible series of safe and secure streets and blocks. The proposed riverside walks and frontage to Armoury Way, Smugglers Way and Swandon Way must be defined by active building frontages. <u>Development should reflect the cheek-by-jowl urban form of Wandsworth; yet imbue its own distinctive townscape to create a strong sense of place.</u> Legible elements to the built form should be created to include a rationale that underpins a location, though the junction of Ram Street and Armoury Way, for a new north-south street. A view through the site to Ferrier Street along the axis of a new street is <b>required encouraged</b>. Residential <b>use should be avoided</b> <u>will not be appropriate</u> at ground floor level along these frontages.</p>	<p>It is agreed that there is no need to include a reference to the 'cheek-by-jowl urban form of Wandsworth'.</p> <p>No evidence has been provided to demonstrate that residential use should be avoided will not be appropriate at ground floor level. No changes are therefore proposed to this part of the site allocation.</p>	Reference to the 'cheek-by-jowl urban form of Wandsworth' removed from Site Allocation WT4.
	Wandsworth Cycling (London Cycling Campaign)			169	4.56	<p>There needs to be a requirement for safe provision for walking and cycling ("friendlier" too vague, especially given how unsafe the area is today for active travel)</p>	LP51 Sustainable Transport requires all new developments to meet the Healthy Streets Objectives which include the need for neighbourhood environments to be made safer, including reducing road danger and improving personal security.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			170	4.57	<p>All new connections and routes to include safe provision for both walking and cycling</p>	LP51 Sustainable Transport requires all new developments to meet the Healthy Streets Objectives which include the need for neighbourhood environments to be made safer, including reducing road danger and improving personal security.	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1033	4.57	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Movement</b> - The layout of buildings must allow for new connections providing public access through the site <b>broadly</b> aligned with Ferrier Street from Swandon Way west through to the riverside walk; and also further south linking Swandon Way west through to the riverside walk; from Armoury Way</p> <p>opposite Ram Street north through the site; and <b>(subject to site ownerships and deliverability)</b> a connection to Smugglers Way by a new access passing under the rail track; a new bridge over the</p>	Comment noted. The wording has been reviewed to align it with the SPD.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Wandle to <b>The Causeway Dormay Street area and a new footbridge over the Wandle</b> further north near the railway. This proposal conflicts with the <u>Wandle Delta Masterplan</u> .		
Kin Development		Ben Ford	Director Quod	1034	4.58	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Context</b> - <u>Proposals should respond to constraints associated with existing utilities restrictions,</u></p> <p><u>easements or Health and Safety Executive (HSE) guidance. The site contains a former gas holder</u></p> <p><u>and significant infrastructure that supported its former use, including a gas mains and gas 'governor'.</u></p> <p><u>Development will need to carefully consider the impact this infrastructure will have on any proposal.</u></p> <p><b>The site contains existing utilities restrictions, easements; a Hazardous Substances Consent; a former gas holder and significant infrastructure that supported its former use, including a gas mains and gas 'governor'. This area, along with others in the cluster may be subject to substantial decontamination, enabling and remediation costs which may have an impact on deliverability and viability. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring the site forward for residential led mixed-use development (in accordance with LPH1, LP Footnote 59 and the site allocation) then the Council may apply flexibility to the policies set out in the Reg 18 Plan.</b></p>	Comment noted.	Agreed that the subject of decontamination should be added to the development consideration however it is not considered a requirement to include a reference to flexibility in the site allocation.
Kin Development		Ben Ford	Director Quod	1038	4.60	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Site Layout</b> - The site should be broken down into a number of small urban blocks to create a</p> <p>distinctive neighbourhood that promotes permeability and legible connections to the wider area.</p> <p>Proposals should <u>incorporate lower elements allowing allow daylight into spaces between blocks perimeter block courtyards</u>. Economic uses should <b>ideally</b> be clustered together in order to create a distinctive hub of businesses and to help minimise potential conflicts with residential uses. Cultural creative industries workspace should include yard space and should be public-facing in order to enliven the public realm. The potential for a public-facing commercial aspect (such as communal gallery space or individual micro-sized retail units) should be explored. All new development will be required to have frontages on to the existing streets and new streets with entrances.</p>	The Council considers the existing language to be sufficient.	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1039	4.61	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Massing</b> - Proposals should include buildings with varied height, scale and massing and <u>with a focus on courtyard typologies should be considered. Low-rise buildings to can</u> make an inner spine route to provide a human scale, as well as low-rise buildings facing railway arches to achieve the same effect should be proposed. There is potential for towers marking prominent/ gateway locations <b>across the site in north-west and south-east corners of site. Buildings</b></p>	Comment noted. The wording has been reviewed to align it with the SPD.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><u>should rise along Swandon Way to a gateway location in the southeast corner.</u> Massing along the Wandle riverfront can be varied.</p> <p>The massing approach suggested does not reflect the orientation of the site and the path of the sun.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1625	4.62	<p>See attachments on 1615 for more detail</p> <p>WT4 Hunts Trucks/Gasholder Cluster</p> <p>Nature - The development must deliver a biodiversity net gain to the river corridor by providing a minimum of a 10metre wide buffer habitat to the River Wandle, where feasible to ensure an ecologically functioning corridor as part of essential green-blue infrastructure. This must include a restored natural bank to the River Wandle with native species.</p>	<p>Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.</p> <p>Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.</p> <p>The Biodiversity Strategy and the Biodiversity Action Plan provide more detail as to how the Council will address the River Wandle and its native species.</p>	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			171	4.66	<p>...and the provision of a riverside walk <b>[add] for use both walking and cycling</b> along the River Wandle and Bell Lane Creek <b>should be [ADD] are required</b> provided with new bridge crossings to Causeway Island and the Gas Holder Site (WT4). Improvements to The Causeway to provide a safe and attractive walking and cycling environment connecting with the wider area <b>will the expected [Please clarify this - should read 'are required']</b></p>	Comment noted	Paragraph 4.66 has been amended to clarify that both walking and cycling will be required along the riverside walk. The other requirements will not be changed to ensure sufficient flexibility is included.
	Wandsworth Cycling (London Cycling Campaign)			172	4.66	<p>...and the provision of a riverside walk <b>[add] for use both walking and cycling</b> along the River Wandle and Bell Lane Creek <b>should be [ADD] are required</b> provided with new bridge crossings to Causeway Island and the Gas Holder Site (WT4). Improvements to The Causeway to provide a safe and attractive walking and cycling environment connecting with the wider area <b>will the expected [Please clarify this - should read 'are required']</b></p>	Comments noted.	Paragraph 4.66 has been amended to clarify that both walking and cycling will be required along the riverside walk. The other requirements will not be changed to ensure sufficient flexibility is included.
Emma Broadbent	London Rivers Officer South East Rivers Trust			259	4.66	<p>Site Allocations Frogmore Cluster:</p> <p>We welcome the recognition that the open area adjacent to the River Wandle on Causeway Island should remain undeveloped and be enhanced to contribute to the biodiversity of the river and we support plans for the area west of The Causeway to be considered for public open space.</p> <p>As with our recommendations for other sites, no less than 10m should be left between the development and the riverbank, taking into account the importance of the riparian zone in enhancing the biodiversity of the site. The materials used for the riverside walk should be carefully selected so that they facilitate ecological interactions across the river bank buffer zone and do not present a barrier to wildlife.</p> <p>Within the Nature section of the design requirements, this site allocation refers to the potential for significant contribution to the aims of the Wandle Valley Regional Park. We welcome this inclusion but, as with all riverside developments listed within this document, we would like to see reference to the Wandle Catchment Plan also included.</p>	<p>Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.</p> <p>LP12 Water and Flooding is considered to comprehensively account for all the riverside needs there the Wandle Catchment Plan will not be included.</p>	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1627	4.66	<p>See attachments on 1615 for more detail</p> <p>WT5, WT6 &amp; WT7, Frogmore cluster</p> <p>Whilst the information mentioned riverbank improvements to enhance biodiversity. It needs to be clearer that a Biodiversity Net Gain must be achieved, including a wide buffer area between the river and new development. The buffer habitat should include providing estuary edge habitats, and integrate these around the public access improvements. Terrestrial biodiversity improvements within the buffer zone should be in addition to restoring more natural margins to the watercourse.</p>	Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			682	4.67	TfL would like to see a requirement for all of these sites to be car free.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Wandsworth Cycling (London Cycling Campaign)			175	4.74	... with a new bridge <b>[ADD] to accommodate walking and cycling</b> linking this to the proposed open space on Causeway Island.	The site allocation already requires improvements to The Causeway to provide a safe and attractive walking and cycling environment connecting with the wider area will be expected.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			174	4.77	... <del>would be beneficial</del> <b>[ADD] is required [note: not a 'nice to have']</b> to the site layout for the Frogmore Depot site (WT6) to potentially provide vehicular access routes off Frogmore to serve the area as well as accommodating improved <b>[ADD] high quality</b> walking and cycling links to Putney Bridge Road	LP1 Urban Design and the Walking and Cycling Strategy will provide additional guidance on how the walking and cycling links should come forward in terms of design and quality.	Paragraph 4.77 has been amended to reflect the comments.
	Wandsworth Cycling (London Cycling Campaign)			177	4.81	(i) These should all be requirements  (ii) they should all accommodate both walking and cycling	The Council are sufficiently happy with the flexible language used in this site allocation.	Paragraph 4.81 has been updated to reflect the need for walking and cycling infrastructure.
	Wandsworth Cycling (London Cycling Campaign)			178	4.83	(i) This needs to be a requirement  (ii) the new route must accommodate both walking and cycling	The Council are sufficiently happy with the flexible language used in this site allocation.	Paragraph 4.83 has been amended to reflect the need for active travel infrastructure:
	Wandsworth Cycling (London Cycling Campaign)			179	4.92	Future provision <del>should</del> <b>[ADD] is required</b> to be made at the western edge of the site to allow for a future installation of a new pedestrian/ cycle connection across Swandon Way - new pedestrian/cycle bridge connecting over Swandon Way to the Hunts Trucks/Gas Holder site (ref WT4)	It is considered that a pedestrian cycle bridge over Swandon Way would not be feasible and has been removed.	References to pedestrian and cycle bridge link across Smugglers Way to the Ferrier Street Cluster have been removed.
Josephine Vos	Transport for London			684	4.92	TfL would like to see a requirement for the site to be car free. TfL welcomes the requirement for contributions towards improved public transport. The design and location of the proposed pedestrian crossing of Swandon Way should be discussed with TfL at the earliest opportunity.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.	No change to the Local Plan required as a result of this representation.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1138	4.92	<b>Ferrier Street Cluster Site Allocation</b>  The Morie Street Studios site is located within the Ferrier Street Cluster site allocation, which carries forward the previous site allocation (ref 42C) from the adopted Local Plan: Employment and Industry Document 2018.  The draft site allocation is supported in principle and Workspace can confirm that the site is deliverable in the short to medium term as confirmed through pre-application discussions held with the LBW.  Notwithstanding this, a number of suggested amendments to the proposed wording of the site allocation are included below to ensure that the site can provide the maximum quantum of sustainable development.  The below comments are made following the structure of the draft allocation. The proposed revisions to the text are highlighted on a tracked change version of the draft site allocation which is included at Appendix I.	Comments noted. Detailed responses are provided against each of the suggested amendments, which are recorded as separate representations.	No change to the Local Plan required as a result of this representation.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1139	4.92	The site allocation description makes reference to a new pedestrian/cycle bridge connecting over Swandon Way to the Hunts Trucks/Gas Holder site (ref WT4). it is not feasible, deliverable nor beneficial to provide a bridge in this location due to the gradients required to make a bridge accessible, and therefore this wording should be deleted.  Indeed, this was previously been demonstrated as not being feasible through pre-application discussions with LBW. further evidence in this regard is provided as part of this representation in the form of a Feasibility Report prepared by Steer, which is included at Appendix II.  In summary, this report demonstrates that a bridge in this location is not feasible and would preclude the redevelopment of the site, which was ac	Comments regarding the new pedestrian/ cycle bridge connecting over Swandon Way to the Hunts Truck/ Gas holder site are agreed.  The site allocation identifies the presence of food and drinks businesses within the location. The built form of the western part of the site on Ferrier Street, Morie Street and Edgel Street, should reflect the business and industrial character of the area, and this is identified as a design requirement within the site allocation. To support the development of a food and drinks sector or cluster, food and drinks uses are considered appropriate in these locations where they are ancillary to a related industrial use. These should not impact upon the servicing requirements of other industrial uses within the area.	References to pedestrian and cycle bridge link across Smugglers Way to the Ferrier Street Cluster have been removed.  Amend the site allocation to permit ancillary food and beverage uses, where these are related to the primary economic use of the site, and do not impact upon servicing requirements of that or adjacent businesses.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>cepted by officers. Further comments are made in relation to the potential provision of a new pedestrian/ cyclist crossing that would provide a direct and safe connection to Old York Road and Wandsworth Town rail station in the 'Movement' section below.</p> <p>As set out in detail below, following a robust testing in terms of design, transport, noise and air quality it is clear that a route through the site is not feasible. However, there is potential to provide a route to the south of the site and the allocation should be updated to reflect these findings to ensure that it is deliverable and therefore meets the relevant tests.</p> <p>The description notes that there is some capacity for food and drink businesses to the east of the site where it adjoins Old York Road. It is suggested that further flexibility is provided in this regard to enable ancillary food and drink uses to come forward on sites in the west to provide active frontages and contribute towards the vitality of the area as a whole.</p>		
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1140	4.92	<p>The allocation notes that redevelopment of the site should provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) and office (use class E). This requirement is not consistent with the Publication London Plan, which was updated following modifications proposed by the Secretary of State to remove a requirement to ensure "no net loss of industrial uses" on the basis that it may not be realistic and would therefore fail the "effective" test of soundness. On this basis, it is proposed that further flexibility is introduced to ensure that the plan is consistent with the Publication London Plan and the NPPF. Furthermore, the allocation should be updated to make it clear that the target provision of industrial floorspace should be across the wider site rather than on a site by site basis to enable better placemaking.</p> <p>The use of 'Class E' here should be more specific, referring to the relevant sub uses within the use class to avoid the unnecessary protection of a broader range of uses.</p> <p>Notwithstanding the above comments, the requirement should also be to provide at least a 25% increase in the amount of industrial (use classes E/B2/B8/SG) or office (use class E) to provide greater flexibility and avoid precluding the redevelopment of the site.</p> <p>The site allocation requires consolidation and increases in industrial floorspace, with additional floorspace for SME businesses, as well as contributing to public realm uses around Wandsworth Town railway station should also be provided. This should be broadened to include E(gi) office floorspace on the basis that it doesn't fall under the definition of industrial uses but is included within the list of uses which should be increased by 25% as noted above.</p>	<p>As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of 8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers. As such, successful industrial areas, such as within the Central Wandsworth Economic Use Intensification Area (EUJA), within which the Ferrier Street area is located, are identified within the Plan as holding the potential to realise this need. This is considered to be consistent with the NPPF's requirement, set out in paragraph 82, that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" and to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period".</p> <p>Through the Wandle Delta Masterplan SPD, the Council has outlined a strategic framework for the redevelopment of this area. This documents sets out how the 25% uplift required by the EUJA designation might be achieved across the sites as a whole, which - as suggested in the representation - is considered appropriate to support better placemaking. Rather than this being stated within the individual site allocations, it is considered clearer that Policy LP38 (Mixed Use Development on Economic Land) should be amended to clarify the requirement for a 25% uplift (in the Wandle Delta sub-area), and to support applications that come forward in line with the Masterplan SPD, which sets out a strategic approach for how this can be delivered.</p> <p>It is agreed that the site allocation should be more specific with reference to Class E with appropriate uses for the site, which is consistent with LP 37 (Managing Land for Industry and Distribution) and LP 38 (Mixed Use Development on Economic Land).</p> <p>The site allocation (WT 8) covers the Ferrier Street Industrial Estate, the majority of which provides a series of purpose-built industrial units. The re-provision and intensification of the industrial floorspace is required in order for the borough to meet its identified industrial floorspace need (as above), and therefore it is not appropriate for the required 25% increase to be provided as industrial or office floorspace.</p> <p>The provision of intensified office floorspace is permitted, which is identified within the site allocation, however the focus for this site should be on industrial re-provision and intensification, which is clarified by the statement that "Consolidation and increases in industrial floorspace, with additional floorspace for SME businesses, as well as contributing to public realm SME around Wandsworth Town railway station should also be provided".</p>	<p>Amend the policy wording to state the required percentage uplift in economic floorspace within the Bendon Valley EUJA and the EUJAs in the Wandle Delta sub-area. It should be stated that in the latter, a strategic approach has been taken through the area masterplan which cumulatively realises this goal across the different sites, and consequentially, schemes that conform with this approach will be supported.</p> <p>Amend the reference to Class E to be more specific, referring to the relevant sub uses relating to office and industrial uses within the broader commercial, business and service uses class.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
TR Property Investment Trust PLC	TR Property Investment Trust PLC	Mr Chris Brown	Rolfe Judd Ltd	1377	4.92	<p><b>See attached the full representation with context</b></p> <p><u>Site Allocation WT8 and Policy PM2</u></p> <p>The draft Wandsworth Local Plan has been reviewed with specific reference to the Ferrier Street Industrial Estate site, which our client owns and is currently planning to build out in accordance with the approved planning permission 2018/5669 once the S106 is agreed.</p> <p>Our client acknowledges that their site falls within the proposed Area Strategy for Wandsworth Town which will be managed through the introduction of proposed Policy PM2 (Wandsworth Town Place Based Policy). Policy PM2(B) highlights six 'key clusters' which include Ferrier Street (Cluster 5). Each cluster brings together a logical geographical grouping of sites. The policy requires emerging proposals to demonstrate how they realise the various area-wide and site-specific priorities and principles within this Area Strategy, with a particular focus on public realm, connectivity and environmental elements of the proposals which must be balanced with new homes and workspace. Our client welcomes the allocation of their site within these key clusters.</p> <p>The Industrial estate itself is also an allocated site (WT8) within the Wandsworth Town Growth Location. Page 67-68 of the document outlines the expectations and aspirations for the site in further detail. It is clear that allocation is reflective of our client's approved scheme for the majority of elements, including land use, open space, access, built form and connectivity. This welcomed by our client. However it is noted that 'Massing' section acknowledges the following:</p> <p>'Massing - A taller element would be appropriate in the north-western corner of the site adjacent to the railway line'.</p> <p>Further to this, the 'Tall Buildings' section states that:</p> <p>'the height at which buildings will be considered as 'tall' is 5 storeys'.</p> <p>The property which is located in the north west corner of the allocation is outside of our client's ownership, however our client would like further clarification as to whether this 'north western corner' would also include their own properties at immediately east of this corner building. The current proposals for our client's approved scheme in this location are 6 storeys, however it is felt that this could be increased by virtue of the building being situated away from the conservation area and residential streets, therefore making it very unlikely to detrimentally impact residents or local heritage assets through the addition of more height in this location.</p> <p>It is understood that the appropriate height for all tall buildings will be determined through Policy LP4 of the emerging plan. This policy has been assessed in greater detail below.</p> <p>It is also noted that the eastern corner of the site allocation has not been explicitly recognised as a location for a taller element, despite a 10 storey building being approved next to the station within our client's planning application (2018/5669). Our client would like to ensure that the acceptability of this taller element on the eastern corner of the site is acceptable in principle. This has been firmly established through the planning application process and signed off by planning, design and conservation officers, as well as members of the planning committee so the inclusion of this principle is not considered to be controversial.</p>	<p>Support for the allocation is noted.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The definition of a tall building has been developed in accordance with the London Plan. The Plan adopts a design-led approach to development, and thus the identified tall building zones and appropriate height ranges are not always aligned with the height of consented schemes (e.g. when the consented height is not justified based on a design-led approach or solely on design grounds).</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Tony Burton	Wandle Valley Forum			1740	PM2	<p>We welcome recognition of the central contribution played by the Wandle in defining the character and identity of this part of the Borough and the contribution it can play in building physical and other connections that support the vitality and viability of Wandsworth Town Centre. We agree with the view that "its potential remains underutilised" (paragraph 4.14).</p>	<p>Support welcomed. Similar comments were made and taken into account as part of the Wandle Delta Masterplan SPD and the Plan has been developed alongside the SPD to align the Area Strategies.</p> <p>The Area Strategy contains policy to support new open space and parklets, as well as LP49 Sustainable Transport which supports the introduction of parklets to</p>	<p>Changes made to LP12 regarding deculverting where possible.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>We have identified the following principles as part of the masterplanning process for the Wandle Delta and note that in the outcome of public engagement over the Masterplan the “most frequently made comment was to deliver the Wandle Trail” (paragraph 1.5.5).</p> <p>Our principles and this support could be more emphatically supported in Policy PM2. We recognise and welcome Policy PM2’s statement that “the Council will promote.... a series of pocket and linear parks and more natural green spaces focused along the River Wandle and Bell Lane Creek. These should support nature through encouraging biodiversity and providing appropriate habitat, as well as making animated riverside spaces which encourage users ‘to dwell’” but this could go further. For example, just as “development proposals for sites within the Wandle Delta area should create opportunities to embrace the Wandsworth Gyrotory proposals in terms of connectivity” so they should create opportunities to extend and enhance the Wandle Trail. These should not be left only to Wandsworth Council to support. There should also be specific policy support for a “parklet” on the east bank of the Wandle where it meets the Thames to re-enforce its inclusion in the Key Diagram for Wandsworth Town Centre. Both the Policy and the Key Diagram should also explicitly reference the need to enhance The Spit.</p> <p>We support the intentions in site allocations WT2, WT3, WT4, WT5, WT6 and WT7 for the Wandle, improvements to the river channel and new access to, along and across it. Site allocation WT10 should prioritise strengthening the relationship of the Switch House to the Wandle’s historic and wildlife value. We warmly welcome the expectation set in site allocation WT9 for extension of the Wandle Trail to the confluence with the Thames and for this to incorporate a generous open space. We also welcome the expectation of creating new public routes to the high level bridge for the riverside walk (also included in site allocation WT11) while noting this is to the east and not the west of the Wandle. These two elements should not be mutually dependent and be capable of being advanced independently of each other. We support the expectation of significant tree planting along Swandon Way in site allocations WT12 and WT13.</p> <p>It is essential that all new and existing routes along and across the river are designed and surfaced to minimise conflict between different users, especially between those on bike and on foot. This also needs to be addressed in Policy LP54. We commend the pedestrian priority and approach developed for towpaths by the Canal and River Trust.</p> <p>Site allocation WT20 references the relationship between Southside Shopping Centre and the Wandle and this could be significantly strengthened. Currently the river runs for c400m beneath the existing building and this is the longest covered stretch along its course. There are opportunities to daylight the Wandle as part of any redevelopment and for the presence of the river to lead the design of any new scheme. We ask that this is addressed more assertively in a revised site allocation. This would be consistent with London Plan Policy SI 17.</p> <p>Although physically located in Hammersmith and Fulham the Wandle Vista of the Wandle Delta should be recognised in the Area Strategy. The Vista is not addressed in paragraph 4.14 or in Policy PM2 which is limited to views in Wandsworth’s Urban Design Study (2020). Nor is it included in the Key Diagram of Wandsworth’s Riverside (page 180) or directly addressed in Policy LP61. There is a strong evidence base supporting identification of this Wandle Vista from the Wandle Vistas report prepared for Wandle Valley Regional Park Trust and Wandle Valley Forum with funding from the Living Wandle Landscape Partnership. This work has been recognised with the RTP’s Excellence in Plan Making Practice award and the Landscape Institute’s Award for Landscape Policy and Research</p>	<p>enhance the public realm. The Masterplan SPD also details enhancements of the Spit and Site Allocation WT9 includes the requirement for open space.</p> <p>Support welcomed.</p> <p>Comment noted. LP49 Sustainable Transport promotes safe, sustainable and accessible transport solutions for all users.</p> <p>LP12 Water and Flooding has been amended to encourage deculverting wherever possible. Site Allocation WT20 also states that opportunities to open up access to the river should be explored.</p> <p>The Placemaking policies for the Wandle River have been developed in accordance with the UDS 2021 which has considered this view in the development of the Area Strategy and the Wandle Delta Masterplan SPD.</p>	
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1141	4.96	<p><b>Open Spaces</b></p> <p>This section suggests that public realm improvements around the station ‘will’ be required. This should be amended to ‘may’ be required to ensure that any future oblig</p>	<p>Comment noted. The Local Plan has set this out as an requirement and would be subject to meeting the relevant lawful tests at the time of an application.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						ations will meet the relevant lawful tests i.e. a suitable scheme may not be identifiable or deliverable at the time of any future application being submitted.		
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1142	4.98	<b>Public Transport</b>  The allocation requests contributions to public transport infrastructure and services. As highlighted above, the wording that redevelopment 'should' be provided should be amended to 'may' to avoid any potential issues with meeting the relevant lawful tests.	Comment noted. The Local Plan has set this out as an requirement and would be subject to meeting the relevant lawful tests at the time of an application.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			180	4.102	Required - not 'should'	It is considered that a pedestrian cycle bridge over Swandon Way would not be feasible and has been removed.	References to pedestrian and cycle bridge link across Smugglers Way to the Ferrier Street Cluster have been removed.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1143	4.102	<b>Movement</b>  As highlighted above, this representation is supported by a feasibility study prepared by Steer, included at Appendix II. The feasibility study demonstrates that a connection through the Morie Street Studios site is not feasible and would risk precluding the future redevelopment of the site.  The feasibility study provides a review of four different potential routes through the site and assesses their suitability in terms of design, viability, acoustics, light, air quality, safety, and service of desire lines.  As a result of the significant level changes between the site and Swandon Way at the centre and the north of the site, any link through the site will take up a disproportionate quantum of ground floorspace which would have significant adverse impacts on both design and viability. There are also issues in relation to noise and security, leading to low quality routes with any potential options through the centre of the site.  There is, however, potential to provide a route to the south of the site. This represents the best option when considered in the round as demonstrated by the diagram included at Appendix III and for the following reasons:  <ul style="list-style-type: none"> <li>• It would minimise the impacts upon the Morie Street studio site's ground floor layout by allowing one building to be provided and not splitting the site into two buildings. The route makes natural use of the desire to have a building that is set back from the southern boundary to facilitate windows along the elevation.</li> <li>• Would be less disruptive to the building entrances and common facilities.</li> <li>• Would make best use of available natural daylight compared to other options, with no building on the neighbouring boundary.</li> <li>• The configuration of the building and the adjacent ground floor units would promote natural surveillance.</li> <li>• Although the Metropolitan Police would prefer to see no new route, the southernmost route would be the most acceptable to them as it would be less likely to result in creating conditions which would encourage criminal activity.</li> <li>• It would provide a direct and gently-graded step-free route, with no ramps or stairs required.</li> <li>• It could be designed to a high quality incorporating soft landscaping and street furniture.</li> </ul> It is strongly recommended that the proposed site allocation is updated to reflect this to avoid precluding the future redevelopment of the site and ensure that the site allocation is deliverable and therefore meets the relevant tests set out in the NPPF.	Comments agreed.	References to pedestrian and cycle bridge link across Smugglers Way to the Ferrier Street Cluster have been removed.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1144	4.106	<p><b>Tall Buildings</b></p> <p>This notes that in accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within town centres and along strategic routes, and the height at which buildings will be considered as 'tall' is 5 storeys.</p> <p>However, as identified in below, a review of tall buildings maps in Appendix 2 of the draft Plan suggests that the site is not located within the relevant area where there are opportunities for tall buildings.</p> <p><b>(See attachment in comment 1137 for the relevant map.)</b></p> <p>The relevant map should be revised to include the site within a location where there are opportunities, however, the wording of the allocation should also be updated to clearly demonstrate that the site is suitable for a tall building in any event. This is critical given the changes to the Publication London Plan Policy D9 which requires that tall buildings are located in locations identified as being suitable within a development plan.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1443	4.106	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p><b>Area Strategy for Wandsworth Town</b></p> <p>The safeguarded Smugglers Way and Pier wharves are referred to in paragraph 4.5 of this section and are both listed as site allocations alongside Feathers Wharf, located directly to the west of Smugglers Way. These are discussed in further detail below.</p> <p><b>Feathers Wharf / Smugglers Way Cluster:</b></p> <p>Welcomed that for this cluster there is reference to the safeguarded wharf at Smugglers Way and its importance for the sustainable movement of freight, waste and aggregates and the need for the site to be retained and its continued operation not negatively affected by any development located in close proximity.</p> <p>- Allocation WT9: Feathers Wharf.</p> <p>This site is located directly adjacent to the safeguarded Smugglers Way and is proposed for potential mixed use redevelopment including potential residential, industrial and/or office uses. For allocation WT9 specifically the allocation states that the area at the northern end of the site (WT9) by the Wandle mouth should be specifically designed to provide a generous open space and include measures that contribute towards enhancement of the riverbanks. To note it is important to also note that there has been previous interest at this site for operations related to waterborne freight cargo handling and this must be considered and promoted as a potential use for this allocation.</p> <p>It is welcomed that the allocation includes reference to the need for any development to not be prejudiced by any development on this site due to its safeguarding and continued operation, in line with the Agent of Change principle. It must be ensured as part of any future development that any proposals are designed to minimise the potential for conflicts of use and disturbance, including during day and night time periods, as the wharf can operate for up to 24 hours a day in line with the tides.</p> <p>Also welcomed that reference has been given to the need to consider the Wandle and Thames riverbanks as part of any future development, which have particularly sensitive ecological and wildlife habitats. With any proposed development along the riverside consideration should be given to the Estuary Edges guidance coordinated by the Thames Estuary Partnership which contains guidance on features that support wildlife and improve access when</p>	As the site is not a safeguarded wharf it won't be promoted for waterborne freight cargo handling above other uses. No the site is not a safeguard wharf.  LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.	The site allocation has been amended to state that any opportunities to make use of the river as part of future development should be explored.  References to riparian lifesaving equipment have been added to LP 61 Riverside Uses, Including River-dependent, River-related and River Adjacent Uses

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>reconstructing or refurbishing the banks of the estuary. (<a href="https://www.estuaryedges.co.uk">https://www.estuaryedges.co.uk</a> ).</p> <p>Noted that the allocation states proposals will be expected to contribute towards the cost of providing improved security to the pedestrian and cycle link through the Western Riverside Waste Transfer Station to link to the Riverside walk, and that there should be there should be provision for a riverside walk adjoining the River Thames and Wandle in this area. As part of any new of enhanced riverside walkways there must be consideration of appropriate Riparian Life Saving Equipment (such as life buoys, grab chains and escape ladders) provided alongside these areas, in line with the PLAs guidance for development on and alongside the Tidal Thames.</p> <p>In addition to note the PLA's Thames Vision has identified the River Wandle / Bell Lane Creek area as a potential residential mooring opportunity zone. Across the tidal Thames the PLA considers that there is potential for more residential moorings in appropriate locations, particularly for visitor moorings, and the Local Plan should reflect and support this in any relevant policies/allocations.</p>		
Emma Broadbent	London Rivers Officer South East Rivers Trust			260	4.108	<p>Site Allocations: Feathers Wharf/ smugglers way Cluster:</p> <p>Within the Open Space section of this Site Allocation we welcome the requirement that development must include measures that contribute to the enhancement of the river banks and removal of the redundant pipe/cable bridge. As with recommendations for other Site Allocations, we would welcome the requirement for the development to contribute towards the delivery of the Wandle Catchment Plan.</p> <p>We recommend leaving no less than 10m left between the development and the riverbank and the materials used for the riverside walk should be carefully selected so that they facilitate ecological interactions across the river bank buffer zone and do not present a barrier to wildlife.</p> <p>We would encourage SUDS to be listed within the design requirements, as detailed for the Ram Brewery.</p>	<p>LP12 Water and Flooding is considered to comprehensively account for all the riverside needs there the Wandle Catchment Plan will not be included.</p> <p>Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.</p> <p>Policy LP12 Water and Flooding provides detailed guidance with regards to Sustainable Urban Drainage Systems which applies to all site allocations.</p>	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			685	4.108	<p>TfL welcomes the requirement that continued operation of the safeguarded wharf should not be prejudiced by development. TfL would also support a requirement for contributions to improve public transport and facilities for active travel.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1628	4.108	<p>See attachments on 1615 for more detail</p> <p>WT9, WT10, Feather's Wharf/ Smugglers Way cluster</p> <p>The space for ecological features to restore the edge of the river bank has not been specified, but reasonable space for river edge (estuary edge) habitats and terrestrial habitats along the river corridor needs to be provided in order to establish meaningful biodiverse habitats, that will be sustainable and provide the much needed benefits.</p>	Comment agreed.	LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.
Spencer Jefferies	Town Planner National Grid	Matt Verlander	Director Avison Young	1686	4.108	<p><b>See attachment for full context</b></p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p>Policy WT9: Feather's Wharf, The Causeway, SW18</p> <p>0Kv Underground Cable route: KENSAL GREEN - WIMBLEDON 2</p>	Comment noted. The attached plans do not appear to show National Grid assets in Wandsworth.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p>		
Spencer Jefferies	Town Planner National Grid	Matt Verlander	Director Avison Young	1689	4.108	<p><b>See attachment for full context</b></p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets.</p> <p>Policy WT10:Land at the Causeway, SW180Kv Underground Cable route: KENSAL GREEN -WIMBLEDON 2</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p>A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.</p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p>	Comment noted. The attached plans do not appear to show National Grid assets in Wandsworth.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			182	4.120	<p>(i) All need to be requirements</p> <p>(ii) the unobstructed connections need to accommodate both walking and cycling</p>	The Council are sufficiently happy with the flexible language used in this site allocation.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			183	4.121	required (not should). Bridge must provide sufficient space for both walking and cycling	The Council are sufficiently happy with the flexible language used in this site allocation. PM2 People First D outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists. Measures to improve connectivity will be complemented by the provision of additional cycle parking in key locations and in association with development at growth locations including through the use of signage. This is considered sufficient as it covers all site allocations.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			184	4.123	Required. Width to be sufficient to accommodate both walking and cycling	The Council are sufficiently happy with the flexible language used in this site allocation. PM2 People First D outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists. Measures to improve connectivity will be complemented by the provision of additional cycle parking in key locations and in association with development at growth locations including through the use of signage. This is considered sufficient as it covers all site allocations.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			185	4.124	this shall be sufficient to accommodate a safe cycling corridor, to the extent a traffic free cycle path is not already provided on the road itself	The Council are sufficiently happy with the flexible language used in this site allocation. PM2 People First D outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists. Measures to improve connectivity will be complemented by the provision of additional cycle parking in key locations and in association with development at growth locations including through the use of signage. This is considered sufficient as it covers all site allocations.	No change to the Local Plan required as a result of this representation.
	Western Riverside Waste Authority (WRWA)	Mr Christopher Collett	Carter Jonas LLP	1071	4.132	<p><b>See attachment for full representation.</b></p> <p><b>Site Allocations –Feather's Wharf/Smugglers Way Cluster / WT11 Western Riverside Waste Transfer Station, SW12.</b></p> <p>WRWA own half of the Feather's Wharf site that is identified as draft site allocation WT9 and included within the Feather's Wharf/Smugglers Way Cluster and have a development agreement in place with Wandsworth Council that owns the other half of the site.</p> <p>WRWA also own the Western Riverside Waste Transfer Station(WRWTS)(identified as site allocation WT11 in the draft plan) and the</p>	<p>Comments noted. The Western Riverside Waste Transfer Station will remain allocated as a safeguarded wharf as that is its primary function but there is scope for it to be redeveloped with residential uses.</p> <p>The inclusion of the Household Waste and Recycling Centre as a mixed use development would diminish the safeguarded wharf designation and will not be made a site allocation.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Household Waste and Recycling Centre (HWRC), which lie adjacent to the east boundary of the WT9 site.</p> <p>The extent of the WRWA land ownership is shown on the map at Appendix 1.</p> <p>The draft plan proposes the mixed use development of the cluster, including residential, industrial and office uses, with at least the full replacement of existing economic floorspace, with the provision of a riverside walk and improvements to the Wandle riverbank.</p> <p>WRWA strongly supports the inclusion of the Feather's Wharf site allocation (WT9) within the Feather's Wharf/Smugglers Way Cluster and is fully committed to working with the other landowners within the cluster, to help bring forward the mixed-use redevelopment of the area.</p> <p>As identified above, WRWA owns the adjacent WRWTS site (draft site allocation WT11) and the HWRC site. The WRWTS site is allocated as a Safeguarded Wharf within the draft plan. The Council consider that there is potential for the redevelopment of the site which is arranged perpendicular to the River Thames. The facility could be provided in a similar location with potential addition of residential uses above a waste facility. This would offer an opportunity to better address the Waterside Path and the Riverside West development to the east.</p> <p>It is considered that both the WRWTS and HWRC sites should be allocated for mixed use development. The HWRC site is immediately adjacent to the WRWTS and as identified above both sites are owned by WRWA. Both sites together offer an excellent opportunity to play a pivotal role in a more comprehensive redevelopment of the area, than that currently proposed. It is considered that these sites should also be included within the Feather's Wharf/Smugglers Way Cluster and it is not clear why they have been excluded from the cluster in the draft plan.</p> <p>Whilst the wharf is safeguarded and WRWA has a statutory duty to provide waste disposal services for Wandsworth, the site has the potential to play a key part of the redevelopment of the cluster, whilst allowing the WRWA to fulfil its statutory duty. The waste facilities can be provided at an enclosed ground floor level with mixed use development (residential/employment uses) above. There is strong potential for WRWA to continue to fulfil its statutory duty to provide waste disposal services at the site and for the site to play an important role in the wider redevelopment of the area. This is exactly the approach that has been taken with the proposed redevelopment of the facility at Cringle Dock.</p> <p>If some of the current waste transfer activities on the site are relocated, it may provide even greater potential for the redevelopment of the site and open up further opportunities for the cluster.</p> <p>WRWA is aware that the cluster area is included within the draft Wandle Delta Masterplan SPD, which the Council is currently consulting on. The development opportunities for the WRWA sites, detailed above should feed into this emerging SPD and WRWA will be making appropriate representations to consultation on the SPD.</p>		
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1363	4.132	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p>Overall, we strongly support Site Allocation WT11 and recognition from the Council that the site possesses a significant development opportunity for the borough. Notwithstanding this, we strongly recommend that the red line boundary be amended to include Smugglers Way Household Waste &amp; Recycling Centre which immediately abuts the existing red line boundary to the east. Both Western Riverside and the Household Waste &amp; Recycling Centre are operated by Cory and whilst their operational capacity and use is separate (household and commercial) it is imperative they are viewed as one site under Site Allocation WT11. The inclusion of Smugglers Way Household Waste &amp; Recycling Centre within the red line boundary will allow for a holistic</p>	<p>Comment noted. The red line boundary reflects the boundary line of the Safeguarded Wharf only. However it is acknowledged that there are benefits for any future redevelopment to include the recycling centre land whilst continuing to protect the status of the Safeguarded Wharf.</p> <p>The inclusion of the Household Waste and Recycling Centre as a mixed use development would diminish the safeguarded wharf designation and will not be made a site allocation.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						approach towards waste management and future development of both sites for Cory.		
Michael Atkins	Senior Planning Officer Port of London Authority			1442	4.132	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Allocation WT11: Western Riverside Waste Transfer Station.</p> <p>The allocation states that there is potential for the redevelopment of the Western Riverside Waste Authority facility noting that the facility could be reprovided in a similar location with potential addition of residential uses above a waste facility, however no further context is given with regard to a suitable alternative location and it is considered that further information must be provided on this or this reference removed. Furthermore, under the design requirements section it is stated that should the safeguarded wharf be decommissioned then a mixed use residential scheme could come forward with built frontages on to the River Thames and The Causeway. The PLA considers that given the sites safeguarded status, and the recent confirmation of Ministerial Safeguarding Directions for this wharf, the site allocation must be focused on the protection and maximisation of use of the site as a safeguarded wharf during the plan period rather than as a potential housing allocation. As noted in the allocation site description, the current use of the site provides an important strategic role for London, it must therefore be made clear in this allocation that the site will continue to be safeguarded as an operational wharf.</p>	Site Allocations focus on development opportunities whereas policies such as LP43 Protected Wharves provides protections. They should be read together as part of any application for development.	The site allocation has been amended to clarify that reprovion would not be provided on an entirely new site but be reprovion on the same site.
Rachel Holmes	Planning Advisor Environment Agency			1629	4.132	<p>See attachments on 1615 for more detail</p> <p>WT11 Western Riverside Waste Transfer Station</p> <p>Any redevelopment of the site should consider alternative wharf frontage designs that allow for naturalisation of the edge of the river Thames whilst continuing to provide river access.</p>	Comments agreed.	LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the Environment Agency.
	Western Riverside Waste Authority (WRWA)	Mr Christopher Collett	Carter Jonas LLP	1076	4.133	<p>See attachments on comment 1071 for full context</p> <p>Page 72 – Suggested Correction: Site Description The site lies to the north of Smugglers Way adjacent to the bank of the River Thames. To the west of the site is Feather's Wharf and to the east a civic-amenity-site Household Waste Recycling Centre.</p>	Comments noted	The site description has been amended.
	Wandsworth Cycling (London Cycling Campaign)			186	4.138	for the avoidance of doubt both routes are to enable use by walking and cycling	Comments noted.	Paragraph 4.138 has been updated.
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1364	4.140	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p>The design requirements of Site Allocation WT11 and the Kirtling Street Cluster outlines that tall building Tall Building Maps in Appendix 2 of the draft Local Plan. We consider that splitting areas into sub-areas and applying references is granular and does not recognise the nature or appearance of areas within the Borough as a whole nor surrounding areas which are un-allocated within the Local Plan. We consider that Wandsworth Policy should be amended to ensure each site is assessed on its own merits, taking into consideration viability and land constraints.</p> <p>In addition, Appendix 2 of the draft Local Plan states that the tall building definition for Site Allocation WT11 is 5 storeys and 8 storeys for Kirtling Street. In the case of WT11 this is contrary to Publication London Plan Policy D9 (Tall Buildings) Part A which states that Development Plans should define what is considered a tall building for specific localities, the height of which should not be less than 6 storeys or 18 metres. More importantly, the low bar on what is considered tall fails to give weight to the level of development required in these opportunity areas for the Council to meet its own targets.</p> <p>While it is appreciated that the New London Plan provides board guidance for wider London given that site allocations are the key strategic reservoir for new</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The definition of a tall building has been developed in accordance with the London Plan.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						homes within the Borough we would question the logic of placing restrictions on their capacity without undertaking detailed design development through the planning process. We strongly suggest that the Council amend the approach in relation to Allocated Sites to ensure alignment with the New London Plan.		
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1537	4.143	<p><b>See attachment in representation 1534 for context</b></p> <p>Site Allocation – Swandon Way Cluster</p> <p>WT12 Homebase, Swandon Way, SW18 (Ref: WT12) &amp; WT13 B&amp;Q, Smugglers Way, SW18 (Ref: WT13)</p> <p>L&amp;G support the allocation of the Homebase (WT12) and B&amp;Q (WT13) sites within the draft Local Plan which recognises the site(s) as having capacity for higher density development; and are considered suitable for residential use and employment floorspace.</p> <p>The following amendments are proposed to make the site allocation sound. Development Considerations</p>	Comments noted. Detailed responses are provided against the specific parts of the Site Allocations identified within the representation.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			686	4.144	TfL welcomes the requirement for modelling to assess the impact on the TLRN and the requirement for public transport improvements. The most effective means to limit impacts on the road network is to require car free development for any revised planning applications, and TfL would like to see this included in the site allocations.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1448	4.144	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>Swandon Way Cluster</p> <p>- Allocation WT13: B&amp;Q, Smugglers Way.</p> <p>Welcomed that consideration is given to the need to ensure that any residential accommodation within WT13 overlooking, or in close proximity to, the Western Riverside Waste Transfer Station and refuse processing site on Smugglers Way is designed in such a way that ensures that safeguarded wharf operations are not negatively affected. In order to make this stronger within the Local Plan the Agent of Change principle should be specifically highlighted here as an important consideration.</p>	London Plan Policy D13 Agent of Change captures this principle and will be a requirement of all developments, including site allocations.	No change to the Local Plan required as a result of this representation.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1536	4.148	<p><b>See attachment in representation 1534 for context</b></p> <p><del>Access - Relocation of access to the existing car park should be considered to allow possible closure of Smugglers Way as a through route with the majority of commercial traffic using the western section to the west of Waterside Path and the remaining traffic using the eastern section of Smugglers Way.</del></p> <p>The B&amp;Q retail warehouse has been demolished, and therefore this comment regarding access to the existing car park is irrelevant in relation to the proposed residential use of the site. This comment on Access should therefore be removed or updated to reflect the recent planning permissions.</p>	Agreed.	Reference to the access development consideration has been removed from the Site Allocation.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial)	Neil Wells	Quod	1538	4.150	<p><b>See attachment in representation 1534 for context</b></p> <p>Planning Permissions – The Homebase site (WT12) has planning permission for the demolition of existing retail warehouse building and erection of three residential buildings. For more information see planning application reference: 2016/7356 <u>2020/0011</u>.</p>	Comment noted.	References to planning permissions are to be removed from all site allocations in the Local Plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Nominees Limited							
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1539	4.151	<p><b>See attachment in representation 1534 for context</b></p> <p>Design Requirements</p> <p>Built Form - Development on the frontages to Swandon Way, Old York Road and both frontages to Smugglers Way should be active at ground level and include windows and entrance doors. Residential accommodation at ground floor level on the Swandon Way frontage <u>should be avoided</u>. <del>would not be acceptable and above ground floor level a convincing case would need to be made that any residential accommodation as it would need to enjoy a high level of amenity to mitigate the impact of traffic and railway noise and traffic related air pollution.</del></p> <p><u>The planning permissions have demonstrated that residential is an acceptable use at these locations and therefore the text should be removed.</u></p>	The approved schemes demonstrated that residential accommodation above ground floor is acceptable. However, the proposals do not include residential accommodation at ground floor level.	No changes to the Local Plan are considered necessary as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			187	4.153	<p>this needs to</p> <p>(i) be a requirement</p> <p>(ii) accommodate both walking and cycling</p>	Comments noted.	The language has been amended to clarify the uses required of any new routes.
	Wandsworth Cycling (London Cycling Campaign)			189	4.154	<p>(i) these must be requirements</p> <p>(ii) the safe bridge must accommodate both walking and cycling. Note - all A3 and South Circular traffic will be re-routed along Swandon Way under the current plans for Wandsworth Town Centre</p>	Comment agreed.	The site allocations movement consideration has been amended.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1540	4.154	<p><b>See attachment in representation 1534 for context</b></p> <p>Movement - Proposal should show improved access to the northern part of Wandsworth Town to enhance accessibility and reduce walking times from the northern part of the Wandle Delta area. The feasibility of providing <del>an elevated footway linking the upgraded station entrance at</del> to the Homebase site (WT12) and <del>access</del> to future developments on the north side of Swandon Way should be considered <u>(subject to site &amp; land ownerships and deliverability)</u>.</p> <p><u>The planning permission has demonstrated that an elevated foot way link cannot be achieved at this location and therefore the text should be removed.</u></p>	Comment noted. The elevated footway will remain in the site allocation in the event any future schemes were brought forward which could feasibly include it.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			190	4.156	Requirement. Must also provide sufficient space for safe cycle storage	Comment agreed.	The site allocations site layout consideration has been amended.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1541	4.156	<p><b>See attachment in representation 1534 for context</b></p> <p>Site Layout - As part of the improvements within WT12 to create a northern access to Wandsworth Town Station, a significant up-grade in the public realm of the Old York Road frontage would be expected with improved public transport infrastructure and provision of a car club <u>(subject to site &amp; land ownerships and deliverability)</u>.</p>	Comments noted.	No change to the Local Plan required as a result of this representation.
Legal and General	Legal & General Property	Neil Wells	Quod	1542	4.158	<b>See attachment in representation 1534 for context</b>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Property Partners	Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited					<p>Tall Buildings - In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for 'tall building clusters and/or landmarks' (Site WT13) and opportunities for 'tall buildings within town centres and along strategic routes' (Site WT12), and the height at which buildings will be considered as 'tall' is 5 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.</p> <p>The two sites currently have planning permission for residential buildings ranging from 8 to 17 storeys (Homebase ref. WT12), and 8 to 15 storeys (B&amp;Q ref. WT13). It would seem appropriate to make reference to this in the policy.</p>	<p>accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	
Michael Atkins	Senior Planning Officer Port of London Authority			1449	4.160	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>Wandsworth Bridge Cluster</p> <p>- Allocation WT15: Mercedes Benz &amp; Bemco and WT17:</p> <p>Wandsworth Bus Garage. Welcomed under the context section that the importance of the adjacent safeguarded Pier wharf (WT22) is recognised. As with allocation WT13 above, it is considered that the Agent of Change principle must be specifically referred to emphasise the importance that development taking place on these allocations must be designed to minimise the potential for conflicts of use and disturbance from neighbouring sites, including the safeguarded wharf.</p> <p>- Allocation WT22: Pier Wharf.</p> <p>It is welcomed that the allocation recognises that the site is a safeguarded wharf currently used as concrete batching, which provides an important strategic role. As noted above with regard to allocation WT11 (Smugglers Way) The PLA considers that given the sites safeguarded status, and the recent confirmation of Ministerial Safeguarding Directions for this wharf, the site allocation should be focused on the protection and maximisation of use of the site as a Safeguarded Wharf during the plan period rather than as a potential housing allocation if the wharf is de-designated.</p>	<p>London Plan Policy D13 Agent of Change captures this principle and will be a requirement of all developments, including site allocations.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Josephine Vos	Transport for London			687	4.161	<p>TfL supports the requirement for all three sites to be car free. WT17 contains an operational bus garage. Although it does not provide services for the TfL network, it is still an operational transport use and so the provisions of T3 in the London Plan on safeguarding and retaining land in transport use would still apply. We welcome the requirement that continued operation of the safeguarded wharf should not be prejudiced by development.</p>	<p>LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Audrey Julienn	RATPDev	John Cutler		1154	4.161	<p>See attachment for full representation for WT17</p> <p>Dear Sirs,</p> <p><b>Wandsworth Local Plan Review (Regulation 18)</b></p> <p><b>Representations submitted on behalf of The Original Tour – Wandsworth Bus Garage</b></p> <p>We write to submit Representations on behalf of The Original Tour ('TOT') and RATPDev in response to the Council's Local Plan Review (Regulation 18). TOT/RATPDev supports the Council's intention to review its Local Plan in order to deliver the development needs of the borough and welcomes the opportunity to constructively comment on the process. TOT/RATPDev welcomes the inclusion of a site allocation for Wandsworth Bus Garage (Draft Site Allocation WT17), however we highlight a number of points of concern within the detail and recommend alterations accordingly.</p> <p><b><u>BACKGROUND</u></b></p>	<p>Comments noted.</p> <p>See also Comment 1710 -</p> <p>It is agreed that the reference to 'two storeys of accommodation' is unnecessary. The height of proposals on this site will be determined having regard to policies LP3 and LP4. The remaining parts of the 'Design Requirement' are considered appropriate.</p>	<p>LP54 Public Transport and Infrastructure has been amended to clarify that the sites transport uses are protected from development out with certain circumstances.</p> <p>Reference 'two storeys of accommodation' removed from the WANDSWORTH BRIDGE CLUSTER Site Allocation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>Land Ownership</b></p> <p>TOT is a bus operator and a subsidiary of RATPDev, a transportation company based in France but operating across Europe and beyond. TOT operates its Central London sightseeing tours from Wandsworth Bus Garage ('WBG').</p> <p>The Covid-19 pandemic has had significant implications on the operations at WBG given the change in tourist activities over the last year. Therefore, TOT and RATPDev are in the process of reviewing the operation at WBG and are considering options for the site. However, given the central location, the bus garage provides an opportunity for the relocation of other potential RATPDev bus services, or indeed for the withdrawal of the transport use, freeing up the site for mixed use development.</p> <p><b>Grade II Listing</b></p> <p>WBG is grade II listed, and the Historic England listing is included at Appendix 1 for reference. As identified on the Historic England website:</p> <p>'The <b>Details section</b> within the List entry Description describes the asset's form, materials, development, style, design and layout, as relevant to that type of building, monument or landscape. It is not an exhaustive description, but a <b>summary of the main features of the building</b> or site....</p> <p>'The description may be a useful starting point for understanding the claims to special interest, but it will not be the last word. Originally, list entries were brief and intended to help with identification. In recent decades, particularly <b>since the start of post-war listing</b>, greater efforts have been made to explain the history of a building and to <b>outline its claims to special interest</b>'. (our emphasis)</p> <p>The building was first listed in 1983. Whilst listings do not provide detailed assessments of listed buildings, given the above it is clear that broadly speaking, the listing would highlight the main physical features of the building to which its special historic interest relates. In that respect it is salient that the 'Details' element of the listing focusses on materials, fenestration, and detailed architectural details on the southern, eastern and northern elevations. There is recognition that the entrance (southern) elevation has been altered. Significantly, there is no mention of the roof form or roof materials.</p> <p><b>Existing Site Allocation</b></p> <p>The site is allocated in the Wandsworth Local Plan (Site Specific Allocations Document 2016), potentially for a mixed-use development with residential use if a suitable alternative bus garage site could be provided. Alternatively, if the bus garage use remains unaffected, some residential development may be considered appropriate at the upper levels. The site allocation infers that the addition of new build floorspace would be acceptable in conjunction with the reinstatement of the south elevation potentially to its original position (circa 8 metres towards Marl Road). To finance this, a roof extension would be appropriate if 'limited to perhaps 2 storeys of accommodation'. The site allocation also sets out other design principles.</p> <p><b>London Borough of Wandsworth Aspirations</b></p> <p>Before setting out our proposed alterations to site allocation WT17, it is important to highlight the London Borough of Wandsworth ('LBW') aspirations for the WBG site and the surrounding area. As indicated in the draft Wandle Delta Supplementary Planning Document ('WDSPP') (January 2020), within which the site sits, 'The Wandle Delta will be a place that puts people first - strengthened as a mixed urban neighbourhood, a focus for living and working, and a local destination for visitors' (4.1.2).</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>It is clear from the draft WDSPD document that significant change is proposed within the Wandle Delta Area, with a focus on residential-led mixed use development. It is clear that the strategy for the area seeks to move away from the domination of vehicles within the area (2.2.9). Within the Urban Design Study (2020), the site is identified within character area G1 Wandsworth Town and Riverside. Within this character area, WBG is highlighted as a 'valued feature.' At the same time, the 'negative qualities' of this area include the:</p> <p>'Dominance of large industrial buildings is unwelcome, including palisade fencing, blank façades and the presence of heavy good vehicles/waste trucks with smell, noise and pollution. These combine to make a harsh pedestrian environment and poor legibility...'</p> <p>It is clear from reviewing the Council's documents that the Council's ambitions seek the removal of the existing transport use to provide for other uses, and for a high degree of change to the bus garage itself and the immediate surrounds. Indeed, Figures 25, 29 and 30 of the SPD shows a proposed major green space/urban space/local play space within the existing forecourt area of the garage.</p> <p>Figure 33 of the SPD shows the entire perimeter of WBG as 'indicative ground floor frontages', and the supporting text at 5.4.9 and 5.9.19 reinforces this. Presently the building features blank frontages to the north, east and west elevations (with the exception of some minor side doors) at ground floor level, with the bus entrances to the south elevation.</p> <p>Figure 34 shows leisure/workspace as the 'indicative land use character' for WBG. As indicated in the existing and emerging site allocations, the Council also provide scope to incorporate residential use at the site.</p> <p>We have previously sought to engage with LBW Officers in respect of the emerging planning policy position and remain open to discussing the matter in detail.</p> <p><b><u>POTENTIAL MIXED-USE REDEVELOPMENT OF WBG</u></b></p> <p>We enclose with these representations an Outline Development Proposals document produced by TP Bennett on behalf of TOT/RATPDev.</p> <p>The study assessed the development opportunity based on a two-phase process – firstly, it assumes an initial reduction in the scale of the bus operation, and a reduction in buildings used for that purpose. A second phase then considered the withdrawal of all of the bus garage operations from the site, enabling the repurpose the building into a new use.</p> <p>This initial design approach has sought to largely follow the design principles set out in the adopted and emerging planning policy context, to enable residential development as part of the phased withdrawal of the transportation use. However, it is important to highlight that this is only one potential design solution, and there are various potential architectural approaches could be adopted.</p> <p>Given the rapidly evolving implications of the Covid-19 pandemic on the existing bus operations, TOT/RATPDev has since indicated that its preference would be for either the retention of the garage in its entirety, for use by either TOT/RATPDev (potentially with some residential floorspace above the western part of the site, in accordance with the existing allocation), or the sale of the site to provide mixed use redevelopment in one phase. This latter scenario would in our view widen the potential development opportunities as the bus garage use presents physical constraints to development opportunities.</p> <p><b><u>PLANNING POLICY CONTEXT</u></b></p>		



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>National Planning Policy Framework (2019)</b></p> <p><u>Sustainable Development</u></p> <p>The purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). Paragraph 11 sets out that for plan-making, the application of the presumption in favour of sustainable development means that:</p> <p>'a) plans should <b>positively seek opportunities</b> to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.</p> <p>1. b) strategic policies should, as a minimum, <b>provide for objectively assessed needs for housing</b> and other uses, as well as any needs that cannot be met within neighbouring areas...' (our emphasis).</p> <p><u>Efficient Use of Land</u></p> <p>Paragraph 117 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses. Paragraph 118 goes on to state that planning policies should (inter alia) encourage multiple benefits from both urban and rural land, <b>including through mixed use schemes...</b>; and <b>support the development of under-utilised land and buildings</b>, especially if this would help to meet identified needs for housing where land supply is constrained and <b>available sites could be used more effectively</b>' (our emphasis).</p> <p><u>Heritage</u></p> <p>Section 16 of the NPPF provides the policy framework for heritage assets. Paragraph 185 states:</p> <p>'Plans should set out a <b>positive strategy</b> for the <b>conservation and enjoyment of the historic environment</b>, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ol style="list-style-type: none"> <li>1. a) the desirability of sustaining and enhancing the significance of heritage assets, and <b>putting them to viable uses</b> consistent with their conservation;</li> <li>2. b) the wider <b>social, cultural, economic and environmental benefits</b> that conservation of the historic environment can bring;</li> <li>3. c) <b>the desirability of new development making a positive contribution to local character and distinctiveness</b>; and</li> <li>4. d) <b>opportunities to draw on the contribution made by the historic environment to the character of a place.</b>' (our emphasis). <p>The NPPF provides a robust policy context for considering the potential impacts of development proposals on heritage assets in the decision-making process. In particular:</p> <ul style="list-style-type: none"> <li>• Paragraph 189 states that in determining applications, local planning authorities should <b>require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting</b>. As a minimum the relevant historic environment record should have been consulted and <b>the heritage assets assessed using appropriate expertise where necessary</b>. (our emphasis).</li> <li>• Paragraph 190 states that local <b>planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal</b> (taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. (our emphasis).</li> </ul> </li></ol>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>• Paragraph 192 states that in determining applications, local planning authorities should take account of:               <ol style="list-style-type: none"> <li>1. a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</li> <li>2. b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and</li> <li>3. c) the desirability of new development making a positive contribution to local character and distinctiveness.' (our emphasis).</li> </ol> </li> </ul> <p>Paragraphs 193 to 196 then provide a detailed framework for considering the potential impacts of a development on heritage assets through the decision-making process.</p> <p><b>New London Plan (2021)</b></p> <p>The New London Plan has been subject to its Examination in Public, and following intervention from the Secretary of State, the Mayor of London issued a Publication version New London Plan in December 2020. On 29 January 2021 the Secretary of State confirmed that the Mayor can publish the New London Plan, with no further changes to be made. It is therefore anticipated that the New London Plan will be adopted imminently.</p> <p><u>Optimisation of Previously Developed Land for Housing</u></p> <p>Policy H1 of the New London Plan states that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans, especially on sources of capacity including (inter alia):</p> <ol style="list-style-type: none"> <li>1. a) 'sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary; and</li> <li>2. c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.'</li> </ol> <p>In this respect, WBG site is around 200m from Wandsworth Town Station, and 600m from Wandsworth Town Centre, it has a PTAL of 4, and comprises low-density transport infrastructure land.</p> <p><u>Tall Buildings</u></p> <p>Policy D9 of the New London Plan states that Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p> <p><u>Heritage</u></p> <p>Policy HC1 of the New London Plan states that:</p> <p>'B) Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>1) setting out a clear vision that recognises and embeds the role of heritage in place-making</p> <p>2) utilising the heritage significance of a site or area in the planning and design process</p> <p>3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.</p> <p>C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and <b>identify enhancement opportunities</b> by integrating heritage considerations early on in the design process.' (our emphasis).</p>		
Audrey Julienn	RATPDev	John Cutler		1710	4.164	<p>See attachment on comment 1154 for full representation for WT17</p> <p><b><u>PROPOSED ALTERATIONS TO DRAFT SITE ALLOCATION WT17</u></b></p> <p>The Council has recognised that the principle of alterations to WBG is acceptable, and that the site has a significant role to play in the vitality of the new neighbourhood around Wandle Delta and specifically Wandsworth Bridge. Indeed, TOT/RATPDev welcome the inclusion of a site allocation and the inclusion of the site within the WDSPD. However, TOT/RATPDev has concerns in respect of the draft site allocation, and proposes a number of alterations in 'tracked changes' style accordingly.</p> <p><b>Loss of Existing Transport Use</b></p> <p>The site is located within a Draft Economic Use Protection Areas, where the draft new Local Plan sets out a robust policy position to protect existing employment uses (Policies LP 36 Promoting and Protecting Offices; LP 37 Managing Land for Industry and Distribution; LP 38 Mixed Use Development on Economic Land; LP 46 Out of Centre Development). Such policies already provide sufficient protection for the existing employment uses, and requiring the relocation of the bus garage to an alternative site is unjustified, particularly given the current circumstances when TOT/RATPDev business model is significantly affected by the Covid-19 pandemic.</p> <p>In any case, it is unclear why the site allocation only states that mixed use proposals for the site 'may be considered', when the Council appear to actively support the removal of the transport use and the mixed use re-use of the site, as set out earlier in this letter. An explicit indication of support should be set out in the site allocation.</p> <p><b>Proposed Alteration 1:</b></p> <p>'At the Wandsworth Bus Garage site (WT17), proposals for mixed use with residential development <del>may be considered if a suitable alternative site for the bus garage could be provided.</del> <u>will be supported.</u></p> <p>Alternatively, if it can be demonstrated that the requirements of the a existing transport use can remain in-situ unaffected, some residential development may be considered appropriate <del>would be supported above the transport use if the development can protect and enhance the grade II listed building.</del></p>	Comments noted.	LP54 Public Transport and Infrastructure has been amended to clarify that the sites transport uses are protected from development out with certain circumstances.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Audrey Julienn	RATPDev	John Cutler		1712	4.168	<p>See attachment on comment 1154 for full representation for WT17</p> <p><b>Residential Development Fronting Marl Road</b></p> <p>The Draft Site Allocation States that 'On... Marl Road... residential accommodation at ground floor level would not be acceptable and residential accommodation above ground floor level would require a convincing case to demonstrate that any such use would enjoy a satisfactory level of amenity.'</p> <p>It is unclear why such a restrictive text is provided, as there is potential for residential floorspace at the upper floors of both WBG and at the McDonalds site (WT14) to the south either side of Marl Road – the draft site allocation itself highlights that residential use is acceptable on those land parcels. It is considered that the main 'noisy' use fronting onto Marl Road is the transport use itself. Therefore, the loss of the transport use would presumably release the potential for residential use where fronting onto Marl Road.</p> <p>Proposed Alteration 3</p> <p>'On Swandon Way, the Wandsworth Bridge Roundabout, Marl Road and Normans Passage residential accommodation at ground floor level would not be acceptable and residential accommodation above ground floor level would require a convincing case to demonstrate that any such use would enjoy a satisfactory level of amenity. <u>On Marl Road, residential accommodation at ground floor level would not be acceptable and residential accommodation above ground floor level would require a convincing case to demonstrate that any such use would enjoy a satisfactory level of amenity, unless the transport use at Wandsworth Bus Garage is removed and replaced with a use compatible with residential.</u></p> <p><b>Infill Development</b></p> <p>The WBG site is located in a highly sustainable location and includes areas of under-developed land adjacent to the listed building structure, which could be developed to contribute to land use needs and enhance the local built environment. For instance, there is scope to potentially redevelop the existing office space to the south west of the site as shown in the TP Bennett Design Document. Accordingly, TOT/RATPDev welcome the recognition that sensitive infill development and intensification adjacent to the listed building could be possible</p>	<p>Comments noted. The Wandsworth Bus Garage is a single storey building albeit the ground floor is a double height space. It would be inappropriate to convert the building to residential as this would compartmentalise the space to the detriment of the architectural integrity of the building. Moreover, there would need to be a range of physical interventions in the structure that would be untenable.</p> <p>All uses in the locality require non-residential uses to ground floor in policy terms and also it is in a flood zone.</p>	No changes to the Local Plan are considered necessary
Audrey Julienn	RATPDev	John Cutler		1711	4.169	<p>See attachment on comment 1154 for full representation for WT17</p> <p><b>Constraints to Development</b></p> <p>1. Overly prescriptive Design Guidelines</p> <p>TOT/RATPDev has concern that the site allocation constrains future development opportunities at the site. In particular, the draft Site Allocation WT17 retains reference to a limit of two storeys (although the existing allocation states 'perhaps' two storeys, and an indication that any development should be limited to the western part of the garage. It is not clear from the Council's evidence as to why such design guidance is proposed - there does not appear to be any detailed heritage assessment in respect of the WBG which has led the Council to indicate that only the western part of the site would be appropriate for development, or why only two storeys would be appropriate. Although the eastern part of the roof is the least altered, that does not necessarily indicate that there should be no alterations made to the other parts of the roof - as previously highlighted, the Historic England listing does not highlight any part of the roof as a main feature of the building.</p> <p>Indeed, the draft WDSPD indicates a high level of change to the fabric of the building, including the potential for active frontages at ground floor level along the southern, eastern and western elevations, which have been highlighted by Historic England as the main features of the building. It is our view that were the</p>	<p>It is agreed that the reference to 'two storeys of accommodation' is unnecessary. The height of proposals on this site will be determined having regard to policies LP3 and LP4. The remain parts of the 'Design Requirement' are considered appropriate.</p>	Reference 'two storeys of accommodation' removed from the WANDSWORTH BRIDGE CLUSTER Site Allocation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>transport use to be removed from the site, there would be a greater level of justification for alterations to the building.</p> <p>In this instance, the Local Plan allocations should not unnecessarily constrain development by placing an arbitrary limitation on height. The allocation as currently worded places a significant level of restriction on development potential, which would in any case be subject to rigorous scrutiny at planning application and listed building consent stage. Indeed, Paragraphs 194 to 196 of the NPPF sets out the approach to balancing any harm to heritage assets against public benefits of development, and other considerations as relevant. Including over-prescribed design guidelines on a heritage asset within a site allocations document imposes a further layer of constraint to any future development proposal.</p> <p>This is particularly in light of NPPF Paragraph 185 which requires Local Plans allocations to provide a positive strategy for the conservation and enjoyment of the historic environment. This should take into account the desirability of new development making a positive contribution to local character and distinctiveness, and opportunities to draw on the contribution made by the historic environment to the character of a place.</p> <p>Such prescribed level of detail is not included within the other draft Site Allocations. For instance, for sites WT14 and WT15 there is no mention of specific design requirements or heights (other than the recognition that this area has opportunities for tall building clusters and/or landmarks), despite the fact that both buildings have a close relationship to the WBG and are intrinsic to its setting.</p> <p>1. Impacts on Development Viability</p> <p>The existing (2016) site allocation, with its restrictive design guidance does not present a financially viable development opportunity to the market. The fact that the landowner has not been approached by any developers in the intervening period would indicate that to be the case. Initial development appraisals carried indicate that the TP Bennett Phase 1 option i.e. the partial retention of the garage (assuming on-site affordable housing at 35%), is not viable, delivering a negative land value.</p> <p>The Phase 2 approach presented by TP Bennett would produce a positive land value. However, that scheme proposes some elements which would not currently accord with the stringent design parameters set on the building within the proposed and existing allocations. In any case, the landowner would need to consider whether the land value received from any land sale would outweigh the value to the company as a bus garage. In this respect, RATPDev as a bus operator has various routes which could be serviced from the garage.</p> <p>As previously highlighted, it is held that the site allocation as existing, and as proposed seeks to unnecessarily restrict the development potential of the bus garage. The Council clearly has significant aspirations for the Wandsworth Bridge area to become a vibrant mixed-use area and identifies WBG as playing a key role in that. However, the restrictive policy position hamstring the opportunities for development at the bus garage, therefore reducing the chances of TOT/RATPDev vacating the site. Consequentially, if the draft site allocation is not amended, WBG is more likely to stay in use as a bus garage for the foreseeable future – this is not particularly compatible with the residential-led mixed use neighbourhood the Council aspires to for this location, within which the site is centrally positioned. A priority of the allocation should be ensuring a long-term future for the bus garage building, which would mean not allowing developments that could affect its potential to deliver a viable comprehensive scheme.</p> <p>Proposed Alteration 2</p> <p>'The Wandsworth Bus Garage site (WT17) could include some limited additional floorspace, limited to 2 storeys of accommodation, that could be added above the western range of the building – which is largely workshop</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>space <u>if a transport use is retained</u>. The proposal could be a clearly modern, simple rectilinear form, superimposed over the existing structure and broadly mirroring an element of the north-south multiple roof array over the bus garage proper.</p> <p>'It would be beneficial to restore the architectural integrity of the Wandsworth Bus Garage (WT17) building, i.e. the original building front on the south side that was unsympathetically altered. Proposals could achieve this by reinstating this principal elevation to match the quality of the surviving north and east elevations. <u>There is potential to reinstate the frontage elevation some 8 metres to the south.</u></p> <p><u>If the transport use is removed, there could be scope for wider development above the central and eastern ranges of the building subject to a robust assessment of heritage considerations at planning application and listed building consent stage.'</u></p>		
	Wandsworth Cycling (London Cycling Campaign)			191	4.171	for the avoidance of doubt this will accommodate both walking and cycling	Comment noted.	No changes to the Local Plan are considered necessary.
Audrey Julienn	RATPDev	John Cutler		1713	4.178	<p>See attachment on comment 1154 for full representation for WT17</p> <p><b>Tall Buildings</b></p> <p>Given the highly sustainable nature of the site (PTAL 4), and noting the high degree of change within the immediate locality, it is important that the New Local Plan recognises this area as an area where tall buildings are appropriate (subject to detailed design and technical considerations). Therefore, we welcome the 'Opportunities for Tall Buildings' designation which covers the site (Policy G1d) but would welcome further parameters around this. We note nearby consents nearby for heights of between 7 and 15 storeys at the former Homebase site at Swandon Way (LPA ref: 2016/7356) and 8 to 15 storeys at the former B&amp;Q site on Smugglers Way (2017/0580). In our view a similar range of heights would be appropriate in this area.</p> <p><b>CLOSINGS</b></p> <p>We would be grateful if you could please confirm safe receipt of these representations and for the above comments to be considered before the New Local Plan Publication (Regulation 19) document is finalised.</p> <p>Please do not hesitate to contact us should you wish to discuss any of the above further. We would be pleased to meet to discuss the matter in detail.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			689	4.179	TfL supports the requirement that parts of the site may be required for highways and/or access improvements and that improvements to public transport would be required. As stated, there will need to be early engagement with TfL and account taken of the proposals for the gyratory. Improvements to walking and cycling access will be essential but the form these take should be flexible to take account of the proposed development and its relationship to other sites.	Comment noted.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			193	4.184	This would become a requirement in the event of any restriction / reduction to the current walking and cycling provision through the roundabout	Comment noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			690	4.192	TfL would like to see a requirement for the site to be car free.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			692	4.201	TfL would like to see a requirement for the site to be car free and welcomes the recommendation that on-site car parking should be removed.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Wandsworth Cycling (London Cycling Campaign)			195	4.209	(i) must be requirements  (ii) access, links, and the new public space must all accommodate both walking and cycling	Comment noted. PM2 People First D outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists. Measures to improve connectivity will be complemented by the provision of additional cycle parking in key locations and in association with development at growth locations including through the use of signage. This is considered sufficient as it covers all site allocations.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			693	4.213	a requirement for the any additional development to be car free and for existing to be reduced.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.  Existing car parking will be considered on a case by case basis.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1188	4.213	<p><b>Consultation on the 'Pre-Publication' Draft Local Plan (Regulation 18)</b></p> <p><b>Landsec/Invesco: Southside Shopping Centre</b></p> <p><b>Introduction</b></p> <p>We are instructed by our client, Southside Limited Partnership, a Joint Venture between Landsec and Invesco, to formally submit representations to the London Borough of Wandsworth ('LBW') consultation on the 'Pre-Publication' Draft Local Plan (Regulation 18).</p> <p>Our client has a long leasehold interest in the Southside Shopping Centre ('Southside') in Wandsworth Town Centre. The Freehold is held by the London Borough of Wandsworth.</p> <p>Southside was originally constructed in the late 1960s and launched as the Wandsworth Arndale in 1971. At the time, it was the largest indoor shopping space in Europe. Since then, the Centre has been expanded and the most recent major redevelopment was completed in October 2015, creating an additional 100,000 sq ft of retail and leisure space and delivering 14 modern double-height retail and restaurant units, a Debenhams department store, a new multiplex cinema and a second gym along Garratt Lane and Wandsworth High Street. Planning permission was granted in 2020 for the conversion of the now vacant Debenhams into leisure and entertainment use.</p> <p>Southside occupies 5.78 hectares of the Town Centre, fronting Garratt Lane and Wandsworth High Street. It sits above the culverted River Wandle and adjacent to St Georges Park. The centre itself consists of over 600,000 sq ft of retail and leisure space across 90 units, including a large Waitrose and Cineworld. There are four residential towers located around the perimeter of the site. There is also a medium-rise residential building (known as Eliot and Wentworth Court) running along the spine of the centre, which contains approximately 200 residential homes which are all leased back to the London Borough of Wandsworth.</p> <p><b>Priorities &amp; Objectives</b></p> <p>Our primary objective is to ensure that Southside remains fit-for-purpose in the short, medium and long-term and can continue to thrive as Wandsworth's Town Centre, as well as remaining an asset to the local community and wider Borough. In doing so, there will be an opportunity to deliver significant long-term, local community benefits.</p> <p>Adapting to the changing market is key to the long-term success of Southside as a retail destination. This change is being driven by a number of key macro trends, such as: urbanisation, climate change and the rapid rise of e-commerce. The pace of change, further accelerated by the Covid-19 pandemic, means that physical retail spaces need to adapt to remain relevant</p>	Comments noted. Detailed responses are provided against the specific parts of the Site Allocation and Local Plan Policies identified within the representation.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>as attractive places for people to spend time. Planning policy must allow sufficient flexibility to respond to these changing market conditions.</p> <p>In addition to the above, given Southside's highly accessible, sustainable and urban location, it is considered that the site may have the potential to strengthen the Town Centre environment, with the provision of new homes, flexible retail, leisure and other town centre uses which are capable of responding to the changing nature of retailing and working. We are keen to explore the opportunity to open up the River Wandle, create new parkland, provide new pedestrian routes through the site to improve connectivity and better integrate Southside into the existing community.</p> <p>Therefore, we welcome the opportunity to comment on the 'Pre-Publication' Draft Local Plan (Regulation 18) as a key stakeholder within the area. We welcome the positive tone of the draft document, particularly with regard to supporting smart growth and redevelopment within Wandsworth Town Centre. The Draft Local Plan acknowledges the significant opportunities for transformation in the Town Centre and we agree with this approach. We wish to see greater flexibility and support for continued growth and adaptation in this location.</p> <p>These representations begin by focusing on the Site Allocation for Southside, as set out on Page 82 of the Draft Local Plan. They then comment on some of the more general policies set out in the Draft Local Plan.</p> <p>We welcome the opportunity to comment on the 'Pre-Publication' Draft Local Plan (Regulation 18) as a key stakeholder within the area.</p> <p>Southside's highly accessible, sustainable and urban location offers the potential to deliver new homes, flexible retail, leisure and other town centre uses which are capable of responding to the changing nature of retailing and working. The amendments to the allocation within this Regulation 18 Local Plan proposed are considered critical to the successful future of Southside and there by the continued economic growth and long-term sustainability of Wandsworth Town. The comments and amendments proposed are considered to be in accordance with the NPPF in terms of ensuring prosperous and viable town centre environments.</p> <p>We would be happy to discuss these representations in more detail with the Council at an appropriate time.</p> <p>We would also be grateful if you could keep us informed with regard to any future consultations or updates on the emerging planning policies. In the meantime, if you have any queries please do not hesitate to contact me on 020 7399 5409 or my colleague Louisa Smith on 0207 399 5850.</p>		
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1190	4.213	<p><b>Site Allocation</b></p> <p>Improvements to the shopping centre, including through its redevelopment, to provide improved and additional floorspace, that allows for flexible retail, leisure, and other town centre uses which are capable of responding to the changing nature of retailing and working. Improvements to the existing residential environment should be explored. Improvements to the leisure offer including a more coherent leisure, food and beverage offer to secure an improved evening and night-time economy. Improve social infrastructure and community facilities to support the local community. Whilst we support the principle of the proposed allocation together with its extended boundary, we request some minor changes to the wording of the overarching site allocation.</p> <p>We are supportive of the allowance for flexible retail, leisure and other town centre uses. However, it is also important that residential use is</p>	It is agreed that, in accordance with the references to residential uses within the development considerations section, this should be more clearly identified within the site allocation itself. The allocation could also benefit from being simplified.	Amend the site allocation for WT20 to make reference to residential uses, and simplify the language so that it is focused more clearly on acceptable uses.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>specifically referenced at this stage. This is already recognised as an appropriate use in the 'Development Considerations' section below.</p> <p>It is requested that the above wording be simplified and replaced by the following for ease of understanding:</p> <p><b>"Improvements to the shopping centre, including through its redevelopment, to provide improved and additional floorspace that allows for mixed-use development including residential, retail, leisure supporting the evening and night-time economy and other town centre uses."</b></p>		
Terence Brown	Coordinator Wandsworth Friends of the Earth			1698	4.213	In the event that the Southside shopping complex is redeveloped, there should be a requirement to 'release' the river Wandle from culverting.	Deculverting of this section of the River Wandle would be explored through the application of Policy LP 12 E.6.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1630	4.213	<p>See attachments on 1615 for more detail</p> <p>WT20 Southside Shopping Centre, Wandsworth High Street</p> <p>Any substantial redevelopment of this site must include the de-culverting of the River Wandle as a fundamental part of any scheme. The Environment Agency would object to any proposal that would prevent future restoration of the channel, and would like to see any re - design proposals fully consider the potentially hugely positive outcomes that could be achieved through any development that integrates the river thoughtfully into new urban spaces.</p>	Deculverting of this section of the River Wandle would be explored through the application of Policy LP 12 E.6.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1191	4.214	<p><b>Site Description</b></p> <p>The site lies to the east of King George's Park and west of Garratt Lane. It is bounded to the north by Wandsworth High Street and the south by Mapleton Crescent. It is currently used as a shopping centre with a component of leisure and food and beverage uses, together with residential uses above and adjacent to the shopping centre to the west and north of the site.</p> <p>We are supportive of the proposed extension to the site allocation boundary (Policies Map reference number 37) to include the southern portion of Southside. This is appropriate and accurately reflects the land title ownership.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1192	4.216	<p>Development Considerations</p> <p><b>Uses</b>—Enhancing Southside's retail and leisure offer through appropriate adaptation and/or through its inclusive redevelopment. Flexible retail, leisure and other town centre uses should be supported to ensure the town centre is capable of responding to the changing nature of retailing and working. A flexible approach will be applied to allowing for responding to the changing nature of retail use where this is required for the sustainable growth of Southside, and where it can be demonstrated that a proposal will not negatively impact the vitality and viability of the town centre.</p> <p>We are supportive of this development consideration and feel the land uses identified will assist in ensuring the long-term success of Southside. We request that the development consideration is also accepting of the comprehensive redevelopment of the site, should this be required in order to facilitate development opportunities in the long-term.</p> <p>It is also important that, should it be required, alternative flexible town centre uses may be considered where it can be demonstrated that alternative uses at ground floor are required in order to support the long-term success of the Town Centre.</p>	Support noted. It is agreed that the appropriate for the site allocation to be accepting of the comprehensive redevelopment of the site, should it be required in order to facilitate development opportunities.	Amend this development consideration to exclude the wording 'inclusive'. Further revisions should be made to avoid repetition.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1194	4.217	<p><b>Uses</b>– Improvements to the existing leisure offer including food, beverage and entertainment uses, supporting the evening and night-time economy should be supported.</p> <p>We are supportive of this development consideration.</p>	Support noted	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1195	4.218	<p><b>Uses</b>–Improvements to the existing residential environment should be explored. Opportunities for additional residential accommodation of a high density is appropriate within this sustainable town centre location.</p> <p>Given the sustainable, town centre location, with a PTAL of up to 6a, we are supportive of the principle of additional residential accommodation in this location. In accordance with national planning policy, new development should seek to maximise the scale, form and density of the site given its location. Therefore, we request that 'high density' be added to the policy wording to reflect this context(see proposed change to the wording above).</p> <p>The National Planning Policy Frameworks states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourages residential development on appropriate sites.</p>	In accordance with the London Plan, all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity. These considerations will determine whether the site has capacity for high-density residential development.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1196	4.219	<p><b>Uses</b>–Improve social infrastructure and community facilities to support the local community.</p> <p>We are supportive of this development consideration.</p>	Support noted	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1198	4.220	<p>Design Requirements</p> <p><b>Built Form</b>–<del>Comprehensive</del> redevelopment of Southside should respond positively to the site's proximity to King George's Park through improved public realm and creation of active ground floor uses. A new public square to the north of the site should be provided, which will build off the opportunities presented by the proposed improvements to the Wandsworth Gyrotory system and the regeneration of the Ram Quarter. This public space will provide a key focal point for the town centre.</p> <p>We are supportive of this design requirement and would seek to provide enhanced public realm, active ground floor uses and a new public space as part of any comprehensive redevelopment proposal. Please note, the proposed insertion of the word 'comprehensive' into the wording above.</p> <p>It should be clear that the above design requirements would only be expected where it is appropriate to the scale of development proposed.</p>	It is considered that the existing wording is appropriate and sufficiently flexible. The proposed wording seeks to promote a comprehensive redevelopment of the site.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1199	4.221	<p><b>Built Form</b>–Development should respond to the need to maintain and strengthen active town centre frontages along Garratt Lane and Wandsworth High Street and the important role of the shopping centre as an important retail to support the local community and the wider area.</p> <p>Alternative flexible town centre uses to replace surplus retail floorspace may be acceptable where it can be demonstrated that alternative uses at ground floor are required in order to support the long-term viability of the Town Centre.</p> <p>Active frontages are vital to successful placemaking and we are supportive of the principle of this design requirement. A distinction should be made between the primary frontages of Garratt Lane and Wandsworth High Street, and the existing internal frontages of the Shopping Centre. It is important that this policy does not stifle the potential future redevelopment of Southside, to provide alternative active, outward facing town centre uses across the site.</p>	Agreed. The clarification of the valuable role that town centre frontages play in successful placemaking is a helpful addition, and that it is useful to distinguish between the primary frontages of Garratt Lane and Wandsworth High Street, and the internal frontages of the shopping centre. Reference to the important contemporary role of Southside Shopping Centre should be retained.	Amend the design requirement to emphasise the role of the Garratt Lane and Wandsworth High Street frontages; however reference to Southside's existing retail function as a shopping centre should be retained.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Proposed amendments to the policy wording are set out above.		
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1201	4.222	<p><b>Built Form-</b> New development should ensure that a balance is achieved between maximising the use of the site and minimising its visual dominance including for pedestrians using Garratt Lane. This includes giving careful consideration to building heights across the site and ensuring that street frontages are articulated to minimise its bulk, scale and massing.</p> <p>In accordance with national planning policy, new development should seek to maximise the scale, form and density of the site given the town centre location. There are already tall buildings in this location, so the introduction of further tall buildings here will not fundamentally change the character of the area, or detrimentally impact the townscape.</p> <p>We recognise that a balance should be achieved between the introduction of further tall buildings and minimising visual disturbance on the surrounding Conservation Area. This includes giving careful consideration to building heights across the site and ensuring that street frontages are articulated to minimise bulk, scale and massing.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			196	4.223	<p>(i) This is a requirement. Improved routes include safe cycling space along Neville Gill CI (this is currently a missing link in the Wandle trail) to connect the cycle path in King George's Park to the Ram Quarter</p> <p>(ii) The "new pedestrian routes" need to accommodate both walking and cycling</p>	Comments noted. The site allocation considers redevelopment and improvements which is why the wording does not specify that only comprehensive redevelopment would need to respond positively to the sites proximity to King Georges Park through improved public realm and creation of active ground floor uses.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1202	4.223	<p><b>Movement</b>—Development should improve permeability through the site to strengthen links and integration with the locality including east-west between King George's Park and Garratt Lane including to the Old Burial Ground, and north-south to integrate the site with the Ram Quarter. The Wandle is a natural asset which should be conserved, improved and enjoyed. Opportunities to use design solutions that articulate the location of the culverted River Wandle through the site and open up access, or provide a connection, to the river should be explored. New pedestrian routes at grade level should be provided.</p> <p>We are supportive of this requirement and would relish the opportunity to further strengthen links across the site and improve the relationship with the River Wandle, where possible. Public realm and permeability through the site should be considered imperative to any emerging development proposals and should be considered on a site by site basis.</p>	Comments noted.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			198	4.224	<p>(i) The pavement width increased needs to be a requirement, together with separate traffic free cycle lanes both northbound and southbound on Garratt Lane (if not already in situ at the time of construction)</p> <p>(ii) The improved links must be requirements, and must accommodate both walking and cycling</p>	Comment agreed.	The site allocations design requirements have been amended.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1205	4.224	<p><b>Movement</b>—Where possible, an increase in the width of the pavement widths along Garratt Lane will be sought in order to provide for an improved pedestrian environment and support opportunities for street planting. Improved links to Wandsworth High Street, Garratt Lane, Buckhold Road, Mapleton Crescent and Neville Gill Close should be provided as part of any scheme.</p> <p>We are largely supportive of this requirement; however, some slight adjustments are proposed in the wording above to ensure the practical implementation of the proposed requirement.</p>	Comment noted. The wording is considered appropriate.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1204	4.225	<p><b>Context</b>— Development should maximise opportunities to enhance the living conditions of existing and future residents within and adjacent to the site. This could include opportunities to make better use of roof areas for amenity space designed for all year-round use. Opportunities to provide some publicly</p>	Comments noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>accessible space that allows views across the area to be enjoyed by local people will be supported if such uses do not cause harm to the living conditions of residents through noise and disturbance.</p> <p>We are supportive of this requirement and would seek to improve the living conditions of existing residents as part of any future comprehensive redevelopment proposal; this would include the appropriate provision of both private and public amenity space.</p>		
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1206	4.226	<p><b>Massing</b>– The scale, form and density of development should embrace its sustainable town centre location. Development should minimise its visual dominance from the surrounding Wandsworth Town Conservation Area. This includes giving careful consideration of building heights across the site and ensuring that street frontages are articulated to minimise its bulk, scale and massing. New development should carefully consider the site's location adjacent to the Conservation Area including the uses, location of entrances and contribution to the adjacent street scene.</p> <p>This requirement largely repeats that of the Built Form requirement, and we suggest could be combined. We recognise that a balance should be achieved between embracing the site's town centre location and minimising its visual dominance from the surrounding Conservation Area, through careful and considered design.</p>	It is agreed that this requirement largely repeats that of the Built Form requirement.	Built Form and Massing requirements merged into a more concise Built Form requirement.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1207	4.227	<p><b>Tall Buildings</b>- In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 part of the site is located in an area which has opportunities for 'tall buildings within town centres and along strategic routes' or 'tall building clusters and/or landmarks', and the height at which buildings will be considered as 'tall' is 6 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.</p> <p>We are supportive of Southside being identified as an area with opportunities for tall buildings.</p> <p>We note that the 6-storey reference in this policy is simply the threshold at which tall buildings will be subject to the assessments set out in Policy LP4. Whilst this is flexible and does not preclude taller buildings where justified, the suitability of the 6-storey threshold is questioned given the highly sustainable location and the existing tall buildings on the site, which extend up to a maximum of 23 storeys. Further, there are a number of tall buildings in the vicinity ranging up to 40 storeys (the Ram Brewery). Therefore, the introduction of further tall buildings here will not introduce new elements that fundamentally change the character this area. Further information regarding the methodology and conclusions of the Urban Design Study are therefore requested.</p> <p>Further commentary on this policy is provided below in respect of Policy LP4.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The definition of a tall building has been developed in accordance with the London Plan.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			694	4.228	TfL welcomes the suggestion that the number of access points should be rationalised and reduced. We would like to see a requirement for the site to be car free.	LP53 Parking, Servicing and Car-Free Development sets out the Council's car free parking requirements which will apply to all site allocations.	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1709	4.235	<p>- Allocation WT22: Pier Wharf.</p> <p>It is welcomed that the allocation recognises that the site is a safeguarded wharf currently used as concrete batching, which provides an important strategic role. As noted above with regard to allocation WT11 (Smugglers Way) The PLA considers that given the sites safeguarded status, and the recent confirmation of Ministerial Safeguarding Directions for this wharf, the site allocation should be focused on the protection and maximisation of use of the site as a Safeguarded Wharf during the plan period rather than as a potential housing allocation if the wharf is de-designated.</p>	LP43 Protected Wharves is considered to sufficiently protect the sites use as a safeguarded wharf.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor			1626	4.235	See attachments on 1615 for more detail	LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Environment Agency					WT22 Pier Wharf  Any redevelopment of this site, whilst retaining river dependent uses of the wharf should include options that allow an enhancement to the estuary edges and/or provide suitable enhancement to the terrestrial ecology of the river corridor, to provide a Biodiversity Net Gain.	Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.	
	Wandsworth Cycling (London Cycling Campaign)			200	4.239	Development must contribute to ensuring a continuous safe route must continue to be provided for walking and cycling along the length of Pier Terrace into Jews Row to re-join the Thames Path	Comment noted. PM2 People First D outlines that the Council will seek to improve connectivity and permeability for pedestrians and cyclists. Measures to improve connectivity will be complemented by the provision of additional cycle parking in key locations and in association with development at growth locations including through the use of signage. This is considered sufficient as it covers all site allocations.	No change to the Local Plan required as a result of this representation.
Jane Aliband				54	Map 4.14	I am particularly interested in the plans for Southside and the gyratory system as that is my local area.  I can see a large amount of research on the current area and maps showing current layout. However, I can't find maps showing proposed traffic flow; pedestrian flow; shops etc. Am I looking in the wrong place?	Comment noted. This type of information has not been provided but would be expected of any application for redevelopment of the site. For more information on the Wandsworth gyratory system please see TfL's webpage Wandsworth Town Centre <a href="https://consultations.tfl.gov.uk/roads/wandsworth-town-centre/">https://consultations.tfl.gov.uk/roads/wandsworth-town-centre/</a>	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			161	Policy PM2	G. "pedestrian routes" should read "and safe walking and safe cycling routes"	Comment agreed.	Placemaking policy has been amended.
Josephine Vos	Transport for London			677	Policy PM2	TfL welcomes the strong support given in the accompanying text to the Wandsworth gyratory project and we look forward to continuing to work with the borough to secure its delivery. The date for implementation should be updated to 2025. To reinforce the importance of the gyratory to place-making, a general requirement for developments in the area to provide funding, land or complementary measures towards the project should be clearly stated in PolicyPM2.A few sites in the sub-area are identified as being suitable for car free development which is welcomed. However, TfL would want to see car free development encouraged more widely. All sites in Wandsworth sub-area that have a PTAL of 4 or above should be car free and on all other sites parking should be minimised. For clarity, this approach should be included in policy PM2.We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible. TfL would not want any new vehicle access or servicing from roads which forms part of the TLRN. Where possible existing access points direct from the TLRN should be rationalised or closed when sites are redeveloped.	The references to car free developments in site allocations with a PTAL 4 or higher have been removed as LP53 Parking, Servicing and Car Free Development already includes it as a requirement. It would also be unnecessary to include this provision in PM2 as LP53 is considered sufficient.  The rationalisation or closure of existing points direct from the TLRN will be considered on a site by site basis.	Updated date the IDP to show that the Gyratory will not be implemented until 2025.  Placemaking policy has been amended.  References to car free development in Wandsworth Site Allocations has been removed.  Reference to electric vans in Placemaking Policy has been removed.
Martin Bonham				848	Policy PM2	I would like to make a contribution towards the consultation process on the New Local Plan. The Law defines a Conservation Area as an 'Area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'. I am disappointed that the Tonsley's are not a designated Conservation Area within the New Local Plan. I understand that the reason for this is that the Council do not believe 'The Tonsley's' meet this criteria. I would like to make the point that the area is of considerable historic interest as the estate was owned by Young's Brewery and it is therefore a legacy of that Company's presence in Wandsworth for the last 190 years. In addition to this, I do feel that the Council have done a fantastic job in making sure that all house extensions over the last 75 years have had to comply with planning approval. This has benefited the character and appearance of Wandsworth and in particular 'The Tonsley's'. With the advent of Permitted Development, I feel that this could well change to the detriment of the Tonsley's and wider Wandsworth. I would be grateful if you will consider including 'The Tonsley's' as a conservation area in the New Local Plan	The designation of a conservation is a formal process which is separate from the Local Plan review.	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1026	Policy PM2	Background and Wandle Delta SPD comments are included in the attachment in comment 1025  <u>Underlined is text which should be removed. In bold is new suggested text.</u>	Agreed. Policy LP 46 Out of Centre Development sets out the policy position for the provision of office (and other identified main town centre uses) in out of centre locations, which includes various exceptions such as on allocated sites. It is therefore not necessary to reiterate this position within the Area Strategy for Wandsworth Town.	Remove PM2, Smart Growth Part E, which specifies that "Proposals for office space, including the provision of managed or 'touchdown' space, outside of the town centre boundary will need to demonstrate that it would not undermine the role and function of the town centre".

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Chapter 4 Area Strategy for Wandsworth Town</p> <p>PM2 Wandsworth Town Place Based Policy – OBJECT</p> <p>NPPF para 89 does not require an impact assessment for Class B1 office provision. It requires it only</p> <p>for "retail and leisure development outside town centres, which are not in accordance with an up-to date plan". PM2(E) should therefore be amended to remain in conformity with the national policy and remove this requirement, or at least confirm that the requirement to demonstrate that it would not undermine the role and function of the town centre does not apply to site allocations where Class B1 is promoted as a land use.</p> <p>Smart Growth - E. Proposals for office space, including the provision of managed or 'touchdown' space, outside of the town centre boundary (<b>excluding allocated sites</b>) will need to demonstrate that it would not undermine the role and function of the town centre unless.</p>		
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1209	Policy PM2	<p><b>Policy PM2 Wandsworth Town Based Policy</b></p> <p>We are broadly supportive of Policy PM2 which sets out the Wandsworth Town based policy. We are supportive of future linkages between King Georges Park, Garratt Lane and the Ram Brewery, as well as the overall enhancement of the pedestrian environment at Southside.</p> <p>Policy PM2 states:</p> <p>"B The Council will support proposals which add to the vitality and viability of Wandsworth Town, allowing for change and flexibility while retaining retail in key areas where appropriate and viable, and where the Council has powers to do so. To promote this:</p> <p>1. proposals for larger format retail and leisure should be prioritised in Southside"</p> <p>We support the flexibility of this policy. However, we wish to see greater flexibility and support for growth and adaptation in this location and request alternative flexible town centre uses may be considered where it can be demonstrated that alternative uses at ground floor are required in order to support the long-term success of the Town Centre.</p> <p>Policy PM2 also states:</p> <p>"A. The Council will continue to work with TfL, including through contributions towards its cost, to secure the early implementation of the Wandsworth Gyatory System and its supporting public realm improvements.</p> <ol style="list-style-type: none"> <li>The Council will work with Network Rail and TfL to bring forward the opening of a northern access to Wandsworth Town Station.</li> <li>In conjunction with development opportunities, the Council will promote the development of a new public square and pedestrian access routes within the Wandsworth Town Hall proposals, together with a series of pocket and linear parks and more natural green spaces focused along the River Wandle and Bell Lane Creek. These should support nature through encouraging biodiversity and providing appropriate habitat, as well as making animated riverside spaces which encourage users 'to dwell'.</li> </ol>	Support noted. Policy PM2, Smart Growth Part B states that "The Council will support proposals which add to the vitality and viability of Wandsworth Town, allowing for change and flexibility while retaining retail in key areas where appropriate". Adding a second reference to "and viable" is therefore not considered necessary; however, the policy could be clarified by the addition of reference to town centre uses with respect to 'change and flexibility'. Reference to 'where the Council has powers to do so' is unnecessary as it is implicit.	Amend PM2, Smart Growth Part B to refer to 'change and flexibility of town centre uses' and remove reference to 'where the Council has powers to do so'.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						" We are highly supportive of the Council's ambitions to work with TFL and other infrastructure providers to improve the overall pedestrian environment surrounding Wandsworth Town Centre and particularly the proposed implementation of the Wandsworth Gyratory System, and supporting public realm improvements.		
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1362	Policy PM2	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p>Cory Comments</p> <p>We are encouraged by the Council's recognition that Wandsworth Town plays a key role in delivering sustainable development for the borough and strongly support the emphasis on mixed use redevelopment for sites in this location, subject to existing waste sites (and their associated functions) being recognised in any emerging development proposals. It is noted in Policy PM2 (Smart Growth) that new residential accommodation in Wandsworth Town will help meet the borough's housing target, expected to provide at least 4,199 homes by 2037/38.</p> <p>Whilst we support opportunities to improve connectivity and in turn pedestrian / road safety in the Wandle Delta area, the existing road network must be taken into consideration and fully reviewed in the Wandsworth Gyratory proposals.</p> <p>We understand that TFL and LB Wandsworth are consulting on the improvements and that as part of these improvements a new southbound exit on Smugglers Way is proposed. We strongly encourage that full traffic analysis is undertaken assessing this new southbound exit given the number and frequency of commercial waste vehicles which use Smugglers Way and the surrounding roads. We would highlight that a two-way street and new southbound exit would narrow the road network for commercial waste trucks and would likely require widening of the road. We are concerned that the proposed improvements would lead to Smugglers Way becoming a rat run and therefore recommend this new Southbound exit is heavily examined in all future Wandsworth Gyratory consultations.</p>	Comments noted. These concerns are not within the remit of the Local Plan, but they will be passed on to transport planners within the Council.	No change to the Local Plan required as a result of this representation.
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1517	Policy PM2	<p>PM2 Wandsworth Town Place Based Policy</p> <p>We note that under People First Clause H the policy refers to 'significant' residential accommodation (3,490 homes in the next 10 years). This figure doesn't tally with the table under Policy LP24. We would welcome the opportunity to assess health infrastructure requirements in this growth location.</p> <p>We note that there is a separate consultation on a Masterplan Supplementary Planning Document for the Wandle Delta. The Council and HUDU on behalf of the CCG have been assessing the healthcare impact of individual proposals in the area but would welcome the opportunity to assess the overall impact of development in the Wandsworth Town Place. We note that the development of Ram Brewery (site WT2) is underway and the health and care implications of the increased local population should be considered. We note that the two site allocations contain provision for social infrastructure and community facilities (WT1 Chelsea Cars and KwikFit, Armoury Way, SW18 and WT20 Southside Shopping Centre, Wandsworth High Street SW18) and we would welcome the opportunity to discuss options for additional healthcare capacity in the town centre.</p>	Comment agreed.	Comment noted. Paragraph A (Smart growth) has been modified to reflect the latest housing supply figures which now reflect Policy LP 24.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial)	Neil Wells	Quod	1535	Policy PM2	<p><b>See attachment in representation 1534 for context</b></p> <p>Chapter 4 Area Strategy for Wandsworth Town PM2 Wandsworth Town Place Based Policy – OBJECT</p> <p>NPPF para 89 does not require an impact assessment for Class B1 office provision. It requires it only for "retail and leisure development outside town centres, which are not in accordance with an up-to date plan". PM2(E) should therefore be amended to remain in conformity with the national policy and remove this requirement, or at least confirm that the requirement to demonstrate that it would not undermine the role and function of the town</p>	Agreed. Policy LP 46 Out of Centre Development sets out the policy position for the provision of office (and other identified main town centre uses) in out of centre locations, which includes various exceptions such as on allocated sites. It is therefore not necessary to reiterate this position within the Area Strategy for Wandsworth Town.	Remove PM2, Smart Growth Part E, which specifies that "Proposals for office space, including the provision of managed or 'touchdown' space, outside of the town centre boundary will need to demonstrate that it would not undermine the role and function of the town centre".

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Nominees Limited					<p>centre does not apply to site allocations where Class B1 is promoted as a land use.</p> <p>Smart Growth – E. Proposals for office space, including the provision of managed or 'touchdown' space, outside of the town centre boundary <u>and allocated sites</u> will need to demonstrate that it would not undermine the role and function of the town centre unless.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1623	Policy PM2	<p>See attachments on 1615 for more detail</p> <p>PM2 Wandsworth Town Place Based Policy Placemaking A7.</p> <p>Should be clearer, that any proposals to rebuild or significantly alter the shopping centre should include the restoration of the River Wandle through the site to restore the corridor for wildlife and people as part of the green and blue infrastructure. Unless this is promoted as an aspiration the potential to make the biggest ecological contribution to the River Wandle in Wandsworth will not be considered.</p>	Deculverting of this section of the River Wandle would be explored through the application of Policy LP 12 E.6.	No change to the Local Plan required as a result of this representation.



## Chapter 5 - Area Strategy for Nine Elms

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
May Hale				485	5.1	<p>Please find attached a written objection from Robert Tipping from Nine Elms Pier with regard to the Nine Elms Pimlico Bridge proposal in Pre-Publication Draft Local Plan.</p> <p>I am forwarding his objection on his behalf due to him having computer problems.</p> <p>Robert Tipping is copied into the email for future correspondence.</p> <p>Kind regards</p> <p>May Hale</p> <p>Dear Sir/ Madam</p> <p>I write to object to the proposed bridge between Pimlico and Nine Elms. Especially for the proposed plan 4c. I am the owner of a houseboat at Nine Elms and have been resident there for over 25 years. I am also a Director of and a shareholder in Nine Elms Pier Limited. This plan as proposed, will lead to a capital loss to the value of my houseboat and will undermine the mooring rights that Nine Elms Pier Limited has on the riverbed. Indeed, it may lead to one or more of the houseboats having to be removed. This proposal will cause an increase in noise and light pollution, again affecting the capital value of most or all of the houseboats at Nine Elms Pier. I ask you to reconsider.</p> <p>Yours faithfully</p> <p>ROBERT TIPPING</p> <p>Director, Nine Elms Pier Limited</p>	<p>Before being constructed the Bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the southern landing zone and a location can be finalised.</p> <p>Including the preferred site in the Local Plan will provide greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensure that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.</p> <p>There will be of course, further consultation with residents and businesses, Londoners more widely and other key stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.</p> <p>There is also a dedicated website at this address: <a href="http://www.nineelmpimlicobridge.co.uk/">http://www.nineelmpimlicobridge.co.uk/</a></p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			751	5.1	<p>5 AREA STRATEGY FOR NINE ELMS</p> <p>Our overall concerns with the strategy as presented are the treatment of liveability, density, provision of affordable housing, lack of daylight, transport capacity and need to separate pedestrians and cyclists within the linear park and along the Riverside.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Ms Angela Maxwell				154	5.8	Dedicated road which connects Wandsworth road and Battersea park road going through the SIL should be made available to the HGV/concrete lorries/coaches etc as these vehicles are competing with active travel users such as pedestrians and cyclists on Queenstown road. We have had too many deaths and accidents caused by these HGVs. It would improve the feel and utility of the area and reduce pollution, noise and damage to Queenstown road.	Figure 5.1 identifies several routes which will seek active travel enhancements from Wandsworth Road to the direction of Battersea Park. The Council does stress in the Local Implementation Plan that there will be a focus on reducing vulnerable road user casualties, through street design and reduction of danger from vehicles, especially HGVs including by ensuring the council's fleet meets FORS standards and council drivers have appropriate levels of training including Safer Urban Driver training, aimed at HGV drivers.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			752	5.9	5.9:b Should include reference to the fact that the Parkfield Industrial estate is part of Strategic Industrial Land (SIL) although technically outside the Opportunity Area (OA) as uses complement others in SIL.	Agreed; Parkfield is a well-performing industrial area that forms part of the borough's strategic industrial reservoir.	Amend paragraph 5.8, on the area's industrial provision, to include reference to the Parkfields Industrial Estate.
Ms Angela Maxwell				156	5.10	Build a road HGV/coaches/concrete lorries use only. This heavy traffic on Queenstown road and through the conservation area is dangerous, creates noise, pollution and is not suited to the conservation area. It is socially unjust. A road HGV use only could be built between Wandsworth road and Battersea Park road/ Nine Elms lane and this would also service the New Convent Garden market.	Comments noted	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr Asif Din				245	5.10	The impact on the community of the pier needs to be fully considered with the proximity of the bridge proposed.	Comment noted.	No change to the Local Plan required as a result of this representation.
Mr Christopher Buck				409	5.10	Adding a bridge under the intention to increase open space is an insipid argument. Attempts to build an open space bridge, such as the infamous failed Thames garden bridge project, would have costed £50 million.	Comment noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			753	5.10	5.10 We welcome the designation of Kirtling Street/ Cringle Street as 'an emerging neighbourhood' rather than a collection of sites.	Comments noted.	No change to the Local Plan required as a result of this representation.
Cllr Aydin Dikerdem, Cllr Maurice Mcleod, Cllr Paula Walker				919	5.10	As ward councillors we would like to raise our concerns about the funding of the Nine Elms Pimlico Bridge in the Area Strategy for Nine Elms. 5.10 & Vision in the Draft is obviously supportive in line with the Councils position but we are against this.  We would argue that given the austerity placed on Councils, the already huge Wandsworth Council tax-payer subsidy on the Northern Line (at the cost of affordable housing), and the criminally low 14% affordability criteria on viability for the VNEB Opportunity Area; spending millions more on a footbridge is not a fair or equal use of resources currently. There are much more pressing transport and infrastructure needs.  All the best,  Cllr Aydin Dikerdem, Cllr Maurice Mcleod, Cllr Paula Walker Labour Councillors for Queenstown Ward	It remains the Council's aspiration to build the bridge - the Project is aligned with the stated policy objectives of the Council, GLA and others to encourage healthier travel and support zero emission targets. It responds to forecast demand for increased connectivity due to development in Nine Elms and seeks to do this by encouraging active travel.  New cycle and pedestrian links will help to meet rising transport demand and encourage sustainable, zero-emission forms of travel.  WBC has not instructed the next phases of design work that would lead to a formal planning application for the bridge; this reflects the considerable investment required to progress to the next stage and the current uncertainty about how people's rapidly changing travel choices affect the case for the bridge.	No change to the Local Plan required as a result of this representation.
Tony Hambro	St George's Sq Residents' Association			1083	5.10	Approx Page 88  Para 5.10 "The plans for the Kirtling Street area are among the least developed of the whole VNEB OA; whilst a number of these sites have outline planning permission, none have fixed and developed permissions in place for their future use as a result of the ongoing occupation of the area by the Thames Tideway Tunnel Kirtling Street works. As such, there is significant scope to shape this area through a place-based approach (a what?) , which envisages the area as an emergent neighbourhood rather than a collection of individual sites. A key component in the realisation of this, is that the location has been selected as the preferred landing site for the Nine Elms Pimlico Bridge, (not in Pimlico it hasn't) which would connect the community on the north bank of the Thames in Pimlico with the wider area, and presents the opportunity to establish a world-class public realm / open space as part of the bridge approach." Delete please	The wording is considered appropriate.	No change to the Local Plan required as a result of this representation.
Dr Asif Din				244	5.11	No evaluation on the impact of proposed bridge has been considered on the Nine Elms Pier boat community which has been in recent flux with Riverlight and Thames Tunnel impacting conditions.	The council is keenly aware of the disruption the bridge would cause to the residents of Nine Elms Pier. The design of the bridge is not yet confirmed and within the stage 2 report multiple designs are visualised. One design includes using a linear ramp on the southern landing site which will reduce the impact on the residents of Nine Elms Pier. The Kirtling Street Masterplan provides more details on what this could look like.	No change to the Local Plan required as a result of this representation.
Mr Christopher Buck				408	5.11	Any projected increases of expected bicycle traffic are tenuous at best. Any data captured to generate this projection is now invalid due to the impact of the pandemic. Indeed, many businesses are reconsidering the need for staff to commute to central office locations.  The recent multi-month closure of Vauxhall bridge with the addition of dedicated cycle lanes around Vauxhall station and on Vauxhall bridge is adequate for	The vision for Nine Elms envisages 20,000 new homes in addition to the 10,00 households already there and 25,000 new jobs and so it is reasonable to assume that this increase in people living and working in the Nine Elms area will result in a greater demand for journeys putting increasing pressure on the existing transport network.  The vision for Nine Elms includes the aim to pave the way for improvements in active travel which is why these changes are being brought forward.  It remains the Council's aspiration to build the bridge - the Project is aligned with	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>commuters. You see infinitely more cyclists travelling east west on Grosvenor road to and from Chelsea than those cycling over Vauxhall Bridge.</p> <p>Traffic congestion has increase due to the extra provision made for cyclists. Many roads along the Thames in Pimlico are accessible only via few routes as many "no left/right turn" signs have been posted. Additionally, previous two-lane roads (in each direction) have be converted to single lane due to the doubling of cycle lanes. Journey times along Grosvenor Road were shorter prior to the pandemic and prior to the supposedly temporary "bollards" which were added to the roads overnight.</p>	<p>the stated policy objectives of the Council, GLA and others to encourage healthier travel and support zero emission targets. It responds to forecast demand for increased connectivity due to development in Nine Elms and seeks to do this by encouraging active travel.</p> <p>New cycle and pedestrian links will help to meet rising transport demand and encourage sustainable, zero-emission forms of travel.</p> <p>As paragraph 5.11 notes, the proposed Nine Elms Pimlico Bridge will help to reduce traffic congestion from cyclists and pedestrians.</p> <p>The cycling provision in Pimlico and along Grosvenor Road is outside the remit of this Local Plan.</p>	
Mr Christopher Buck				410	5.11	<p>Any projected increases of expected bicycle traffic are tenuous at best. Any data captured to generate this projection is now invalid due to the impact of the pandemic. Indeed, many businesses are reconsidering the need for staff to commute to central office locations.</p> <p>The recent multi-month closure of Vauxhall bridge with the addition of dedicated cycle lanes around Vauxhall station and on Vauxhall bridge is adequate for commuters. You see infinitely more cyclists travelling east west on Grosvenor road to and from Chelsea than those cycling over Vauxhall Bridge.</p> <p>Traffic congestion has increase due to the extra provision made for cyclists. Many roads along the Thames in Pimlico are accessible only via few routes as many "no left/right turn" signs have been posted. Additionally, previous two-lane roads (in each direction) have be converted to single lane due to the doubling of cycle lanes. Journey times along Grosvenor Road were shorter prior to the pandemic and prior to the supposedly temporary "bollards" which were added to the roads overnight.</p>	<p>The London Plan envisages 18,500 new homes and 18,500 new jobs in the VNEB area and so it is reasonable to assume this increase in people will produce more active transport journeys, particularly in lieu of LP 51 Sustainable Transport.</p> <p>The Vision for Nine Elms includes an aim to pave the way for improvements in active travel which is why these changes are being brought forward.</p> <p>As paragraph 5.11 notes, the proposed Nine Elms - Pimlico bridge will help to reduce traffic congestion from cyclists and pedestrians. The cycling provision in Pimlico and along Grosvenor Road is outside the remit of this Local Plan.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			754	5.11	<p>5.11: Should refer to bus routes through Nine Elms and their importance for linking Battersea to Vauxhall and the City. Capacity is likely to be a concern as building is completed. No mention is made of the importance of Vauxhall Bus Station as an entry point. There is only one bus route (344) which runs from Vauxhall along the whole length of Battersea Park Road and no direct route to the York Road area.</p>	<p>Paragraph 5.11 is primarily focused on active travel context for Nine Elms but it does mention that the improved infrastructure for cyclists also has potential to contribute to alleviating traffic congestion along the A3205 Battersea Park Road/Nine Elms Lane, a major route that is integral for the movement of residents, commuters, goods and services. The Vauxhall Bus Station is not mentioned here as it is within Lambeth.</p>	No change to the Local Plan required as a result of this representation.
Tony Hambro	St George's Sq Residents' Association			1084	5.11	<p>Approx Page 88</p> <p>Para 5.11 "Improving permeability through Nine Elms, in particular across train tracks, (eh?) will be important to encouraging active travel. This also applies to the potential Nine Elms Pimlico Bridge, which provides a huge opportunity for improved active and public transport options, as well as potentially relieving demand for walking and cycling on the neighbouring Vauxhall and Chelsea Bridges. The improved infrastructure for cyclists also has potential to contribute to alleviating traffic congestion along the A3205 Battersea Park Road/Nine Elms Lane, a major route that is integral for the movement of residents, commuters, goods and services." Delete please</p>	<p>The wording is considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Dr Asif Din				246	5.12	<p>More consideration is required on the impact of development and proposed links to existing communities including Nine Elms Pier.</p>	<p>Planning policies contained in the Local Plan set out a holistic framework for managing impacts of development.</p> <p>As set out in policy PM3, the continuity of the Thames Path along the riverside is key to enhancing active travel in the area and ease of movement. Development proposals will be expected to contribute to that achieving that objective. Furthermore, the Council will seek to improve connectivity and permeability for pedestrians and cyclists. This will be achieved by delivering additional cycle routes, in line with the Cycling Strategy for Nine Elms. Future development will therefore improve links within the area.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			755	5.15	<p>5.15: place performance: We understand the scores presented in Figure 5.1 were a result of internal discussion. Overall, they appear very low compared with those for other parts of the borough. They do not differentiate between different parts of the OA (e.g. Vauxhall/Embassy area and Power Station/Battersea Exchange) which we consider would result in a contrasting range of perceptions about living and working in Nine Elms.</p>	<p>The proposed approach is considered appropriate. The diagram shows the performance of the area as a whole. The results have been informed by an online consultation survey conducted as part of the Urban Design Study and internal consultations with key stakeholders</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr Asif Din				247	5.17	I object to the bridge at Nine Elms Pier due to the impact this will have on the residential community there.	Comment noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			757	5.18	General point: The new site allocations entries refer to the need for high quality and distinctive design for frontages onto Battersea Park Road. We suggest some form of Urban Design Guide is prepared for this and other major frontages (e.g. York Road, parts of Clapham Junction)	It is considered that the guidance contained under 'Design Requirements' coupled with policies LP1 and LP4 is sufficient to ensure that future schemes deliver high quality and distinctive design for frontages.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			696	5.20	TfL would like to see a requirement for these sites to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.	No change to the Local Plan required as a result of this representation.
	Western Riverside Waste Authority (WRWA)	Mr Christopher Collett	Carter Jonas LLP	1075	5.20	<p>See attachments on comment 1071 for full context</p> <p><b>Site Allocations –Kirtling Street Cluster</b></p> <p>WRWA owns the Cringle Dock site that is identified as site allocation NE11 and included within the Kirtling Street Cluster.</p> <p>The draft site allocation proposes mixed use development in the cluster with business uses on the ground floor and residential use on the upper floors. The WRWA supports the principle of mixed-use development, but it is imperative that the design process has full regard to the current and future operation of the safeguarded wharfs, including maintaining appropriate access arrangements and hours of operation. For example, areas of open space and balconies will have to be carefully considered for residential uses.</p> <p>The draft allocation goes on to state that proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites will be required to provide open space that connects to the proposed Nine Elms-Pimlico Footbridge and the open space above the Thames Tideway access shaft.</p> <p>The policy does not acknowledge the fact that the WRWA has a statutory duty to provide waste disposal services to four London Boroughs and Cringle Dock is an operational waste transfer station. Located at the eastern end of Cringle Street, it has frontage onto the River Thames to the north, adjoins the Battersea Power Station site to the west and industrial land to the west. There are no opportunities for riverside access at this point.</p> <p>The principle of the redevelopment of the facility at Cringle Dock has been established by the planning permission (reference: 2015/6357)for the demolition, redevelopment and replacement of the existing waste transfer station with residential above. The residential above the new waste transfer station fully complies with the WRWA's operational requirements and is an example to be followed by other mixed-use schemes that are proposed.</p> <p>Temporary planning permission was also granted (reference:2015/6358), for the relocation of all buildings and structures on site and the construction of a temporary waste transfer station comprising a single storey (double-height) structure to accommodate the waste unloading and compaction facilities. This was necessary to allow the WRWA to maintain a waste transfer facility at Cringle Dock.</p> <p>WRWA strongly supports the inclusion of the Cringle Dock site allocation within the Kirtling Street Cluster and is fully committed to working with the adjacent landowners within the cluster, to help bring forward the comprehensive mixed-use redevelopment of the area. The commitment to the Cringle Dock site and Kirtling Street Cluster is demonstrated by the extant planning permissions and the continued dialogue with neighbouring landowners. WRWA considers that the draft allocation needs to provide greater flexibility in the mix of uses that</p>	<p>Comments noted. Urban Logistics Hubs are referenced in PM3 Smart Growth.</p> <p>The site allocation wording is considered sufficient as the open space to the north is considered necessary to link into the development of the Thames Path, the Nine Elms Pimlico Bridge, and the Thames Tunnel access shaft.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>might be suitable and which could make best use of the riverfront access, such as last mile logistics. The policy should not prescribe or fix the uses, rather it should provide support for them.</p> <p>The wording of the draft Kirtling Street Cluster allocation should be revised as follows:</p> <p>The final sentence of the 'site allocation' currently reads as follows:</p> <p>Open space will be required to the north of the cluster, maximising the space created by the access required to the Thames Tideway shaft. This sentence should be deleted and replaced by the following wording:</p> <p>Development of the cluster should incorporate access to the Thames Tideway Shaft and appropriate open space.</p> <p>With regards to Open Space, the draft policy currently reads as follows:</p> <p>Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites will be required to provide open space that connects to the proposed Nine Elms-Pimlico Footbridge and the open space above the Thames Tideway Tunnel access shaft.</p> <p>This wording should be revised to the following:</p> <p>Development proposals should incorporate appropriate open space and connectivity to the proposed Nine Elms-Pimlico Footbridge.</p>		
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1314	5.20	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p>Kirtling Street Cluster Site Allocation</p> <p>We strongly support the proposed allocation of the Kirtling Street Cluster in seeking to bring forward development following the completion of the Thames Tideway Tunnel. The proposed area has the potential to contribute to a key part of the wider Nine Elms Masterplan delivering high quality public realm adjacent to key buildings such as Battersea Power Station.</p> <p>In order to support the delivery of the key benefits associated with this space we have the following observations to make regarding the site allocation requirements.</p> <ul style="list-style-type: none"> <li>• Design Requirements – While guidance is provided, we strongly believe that any development, which comes forward, must be in collaboration with the surrounding landowners to ensure a coherent and optimal design for the site. This is most relevant given that the site is the proposed location of the new River Thames Crossing Bridge and is therefore an important gateway to the area.</li> <li>• Buffer Zone – The above masterplan approach will also provide the necessary assurances that appropriate buffers to the surrounding industrial character can be provided. Cringle Dock is located in the western boundary of the site allocation and while there is a planning permission for its encapsulation, this is yet to be implemented and expires in Mid-2021. It is therefore imperative that the correct boundary conditions are provided in these key areas, addressing the existing condition of the transfer station and protecting new homes delivered towards to the centre and east of the allocation.</li> <li>• Safeguarded Wharf – As discussed above we support the potential consolidation of Safeguarded Wharf sites to release land for other uses. In the case of Kirtling Wharf, we consider it a prime example of a constrained site that could be released for other uses. The wharf will be impacted by both the Thames Tideway Tunnel and the emerging proposals for the River Thames Bridge; we would therefore</li> </ul>	<p>Support for the allocation is noted.</p> <p>The site allocations have been clustered together to ensure that there is collaboration with the surrounding landowners to ensure a coherent and optimal design.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>be supportive of its proposed relocation / consolidation with other wharfs. Notwithstanding this comment as discussed above we also consider the potential retention of the wharf to be further justification for a consolidated approach to the site as credence will need to be given under the Agent of Change principles.</p> <p>In conclusion, we support the principle of the site allocation on site; however, we are concerned that the optimal development may not come forward if it is done through fragmented land parcels. We would encourage officers to engage with the relevant landowners for the site to ensure comprehensive proposals are considered which optimise the site allocation potential.</p>		
Michael Atkins	Senior Planning Officer Port of London Authority			1451	5.20	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>Kirtling Street Cluster</p> <p>- Allocation NE9 Kirtling Wharf and NE11: Cringle Dock.</p> <p>The site allocation for this cluster states that any proposals for mixed use development will need to ensure that they do not have a negative impact on the operation of the safeguarded wharfs including maintaining appropriate access arrangements and ensuring that the operational capacity of the wharves is retained or enhanced, and it is noted that discussions with relevant parties, in particular the PLA and the GLA are required for any such proposals. This is in principle supported.</p> <p>The allocation states that proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites will be required to provide open space that connects to the proposed Nine Elms-Pimlico Footbridge and the open space above the Thames Tideway Tunnel access shaft. As noted above the PLA objects to the proposed change of use at these safeguarded wharves, which would be contrary to London Plan policy including emerging policy SI15 as well as existing Local Plan policy PL9. These sites are safeguarded by Ministerial Direction and should only be used for waterborne freight handling use. The PLA requests further information on these proposals and any proposed implications on the safeguarded wharves. Under the movement section under the design requirements, to note the PLA must be involved in discussions with regard to the proposed Nine Elms – Pimlico crossing and on the public realm and walking and cycling connections to the bridge, particularly on any proposals affecting the adjacent safeguarded wharves.</p> <p>Noted with regard to access that any improvements to the Kirtling Street or Cringle Street junction should maintain appropriate highway access for commercial vehicles to the safeguarded wharves which is welcomed. The reference to the potential for increased usage of the river Thames via the wharves for the transferring of further quantities of aggregates is also supported.</p> <p>In addition, in this section reference is also given to the potential for a high-level walkway over a boxed-in wharf as a potential option for a riverside walkway. The PLA must be involved in any such discussions involving any potential development at the safeguarded wharves here at an early stage. In line with London Plan policy SI15 development proposals that include the provision of a water freight use, with other land uses above or alongside must ensure that the development is designed so that there are no conflicts of use and that the freight handling capacity of the wharf, is not reduced, including to ensure that there is appropriate flexibility for a range of potential wharf operators to ensure the safeguarded wharves are protected and enhanced and continue to be viable over the plan period.</p>	Any proposals for open space would be expected to not interfere with the safeguarded wharves in line with the policies that have been set out to protect them.	Design Requirements Movement (3) has been amended to require the Port of London Authority to be consulted.
Rachel Holmes	Planning Advisor Environment Agency			1632	5.20	<p>See attachments on 1615 for more detail</p> <p>NE9, NE11 Kirtling Street Cluster</p> <p>Development along the Thames riverside must establish a Biodiversity Net Gain and should aim to enhance the banks of the Thames to provide estuary edge</p>	<p>LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.</p> <p>Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						habitats. Where safe guarded wharfs prevent enhancement as part of the scheme, proposals should consider terrestrial improvements and offsite enhancements that could provide net gains for the River Thames.		
Tony Hambro	St George's Sq Residents' Association			1086	5.21	<p>Approx. page 99</p> <p>Site description</p> <p>"The site is north of the junction where Kirtling Street meets Nine Elms Lane. It is east of Battersea Power Station and west of the Riverlight Apartments. The site is bounded by Kirtling Street and Cringle Street to the west and the site includes the Thames Waterfront and part of the river where the new Pimlico Footbridge is expected to land on the Wandsworth side. The site is used as a Thames Tideway Tunnel worksite (until 2024), a waste transfer station, and has commercial uses. The land in the north of this site will become open space to facilitate the ongoing maintenance access to the Thames Tideway shaft" Delete please.</p>	The wording is considered appropriate.	No change to the Local Plan required as a result of this representation.
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1365	5.23	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p><u>Development Consideration: Uses</u></p> <p>The Kirtling Street Cluster contains five site allocations including Site Allocation NE11 (Cringle Dock) operated by Cory. Cringle Dock Waste Transfer Site became operational in 1972 and now predominately handles waste from four London Boroughs (Wandsworth, Kensington &amp; Chelsea, Lambeth and Hammersmith &amp; Fulham). The site's strategic location on the river Thames allows for waste to be transferred onto barges then shipped to the Energy for Waste facility Belvedere in the London Borough of Bexley, also operated by Cory. The Waste Transfer Site is essential to future waste management for London.</p> <p>Considering the above it is a significant concern that the Site Allocation makes little reference to the Wharf designations or waste uses of either Cringle Dock or neighbouring Kirtling Wharf (Site Allocation NE9). Whilst policy states future mixed use development will need to ensure that it does not have a negative impact on the operation of the safeguarded wharfs we consider the allocation does not go far enough to fully address the operation and infrastructure requirements of the wharves. This is contrary to subsequent Policy LP43 (Protected Wharves) specifically part C which emphasises development proposals on sites adjacent or in close proximity to safeguarded wharves should be designed to minimise the potential conflicts of use and disturbance, in line with the Agent of Change Principle. We strongly recommend that the wording of the Site Allocation is reviewed, and emphasis added that future mixed-use development within the Kirtling Street Cluster be assessed in line with Protected Wharf Policy LP43.</p> <p>Further, whilst the Site Allocation aspiration recommends mixed-use development the intensification of the Safeguarded Wharves for the transshipment of freight, waterborne freight handling use, and freight-related activities should be recognised. There are clear opportunities to co-ordinate development between the existing waste site of Cringle Dock and adjacent Kirtling Wharf. Both sites are in industrial use and have established road and river access suitable for riparian freight transport.</p> <p>Viability must also be viewed as a key constraint for any future development and significantly restricts the opportunity for mixed use development on the safeguarded wharf sites. This is exemplified in the approval of permission 2015/6357 granted in July 2016 for a new enclosed waste transfer unit at Cringle Dock with residential uses above. This scheme has not been implemented on site and given its imminent expiry it is considered unlikely to be implemented in the future. On this basis and in line with publication London Plan safeguarded wharf policy and waste management strategies the intensification of the site for waste purposes should be supported within the Site Allocation. This would not prejudice the delivery of mixed-use</p>	Comments noted. The Local Plan should be read as a whole; however, it is considered to be appropriate to include reference to LP 43 (Safeguarded Wharves) within the text of the site allocation to ensure compliance.	<p>Amend the Development Considerations (Uses) within the Kirtling Street Cluster Site Allocation to clarify that development proposals must adhere to LP 43 and to recognise the important function of the safeguarded wharf sites for the transshipment of freight, waterborne freight handling use and freight-related activities.</p> <p>Amend Policy LP 43 (Safeguarded Wharves), Part B, to clarify that development which supports the intensification of the operational capacity of the safeguarded wharves for existing uses, such as waste management, will be supported.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						development within the area with the Thames Tideway site a buffer to residential accommodation further along the Thames.		
Tony Hambro	St George's Sq Residents' Association			1087	5.24	Approx. page 99  Open Space "Proposals to the north of the cluster in the Kirtling Wharf and Cringle Dock sites will be required to provide open space that connects to the proposed Nine Elms-Pimlico Footbridge (now it's a "footbridge"?) and the open space above the Thames Tideway Tunnel access shaft." delete please	Comment noted.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			201	5.29	Must be a requirement	Comment noted. Wording is considered sufficient.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			203	5.32	"need to consider" replace with "be required to make improvements to"	Comment noted. Wording is considered sufficient.	No change to the Local Plan required as a result of this representation.
Tony Hambro	St George's Sq Residents' Association			1088	5.32	Approx. page 100  Movement – "This site will be adjacent to the proposed Nine Elms - Pimlico Footbridge landing site and will need to consider the public realm and walking and cycling connections to the bridge, the riverside walk and street frontages, as well as onward connections to Nine Elms Lane." Delete please	Comment noted.	No change to the Local Plan required as a result of this representation.
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1370	5.32	<b>See attachment on comment 1361 for full representation and context.</b>  <u>Development Consideration: Movement</u>  We recognise the Council's desire to improve the public realm and pedestrian / cycling infrastructure in this location linking with the proposed Pimlico to Nine Elms Pedestrian and Cyclist Bridge (Nine Elms Pimlico Bridge). The proximity of the proposed bridge and new active travel zone to the immediate north east of Kirtling Wharf is likely to have an impact on future river and road vehicle movements and operations that should be considered within the context of the existing safeguarded waste sites. Whilst we support the principle of the bridge and improved connectivity, it is imperative that a coordinated approach is adopted during the consultation and design process in order to avoid any potential conflict with the existing use of Cringle dock and potential future upgrades.  Any intensification or enhancement of Kirtling Wharf and Cringle Dock may result in additional commercial vehicle movements to and from the sites that should be taken into consideration in the traffic data analysis and public realm improvements for the Site Allocation.  We strongly encourage open consultation on access, the nature and number of waste and other vehicles linked to riparian freight movement and, future capacity of the sites. We would be happy to provide further details on this either via a meeting or in document form.	If the bridge goes ahead it will have to secure full planning permission via the creation of a site-specific design aimed at addressing the issues at the southern landing zone. Community consultation will be part of this process. There is also a dedicated website at this address: <a href="http://www.nineelmpimlicobridge.co.uk/">http://www.nineelmpimlicobridge.co.uk/</a>  There was an extensive consultation process throughout the creation of the Stage 1 and 2 reports with 783 feedback forms being collected for Stage 2 alone. However, given the project will still need to gain planning permission if it is to go ahead, there is plenty of scope for residents to influence the project.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			204	5.33	The riverside walk is required, and must accommodate walking and cycling	Comment noted.	No change to the Local Plan required as a result of this representation.
Tony Hambro	St George's Sq Residents' Association			1089	5.35	Approx page 101  "Identity and Architectural Expression - This site will be adjacent to the proposed Nine Elms - Pimlico Footbridge and would be appropriate for a landmark building to be located here as a gateway into Wandsworth."	The wording is considered appropriate.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Sectary to planning committee Battersea Society			758	5.39	NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8. This is potentially a key gateway site (see above). Any new proposal provides the opportunity for an iconic building, especially given links to the linear park.	Comment noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			697	5.39	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road- Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1453	5.39	<b>See the attachment on comment 1441 the representation for context</b>  - Allocation NE2: 41-49 Nine Elms Lane - 49-59 Battersea Park Road and allocation NE12 New Covent Garden Market - Entrance Site:  Support the reference in the Active Travel section for these allocations to enhance access routes toward riverside areas.	Comment noted.	No change to the Local Plan required as a result of this representation.
DTZ Investors		Neil Wells	Quod	1499	5.39	Site Allocation  NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8  DTZi support the allocation of the 41-49 Nine Elms Lane, and 49-59 Battersea Park Road within the Reg 18Plan. The following amendments are proposed to make the site allocation sound.  Site Allocation  The site allocation refers to "Mixed use development including residential and business uses ...".We consider that this suitable for student uses and this should be added to the site allocation as follows "Mixed use development including residential, student accommodation and business uses....".  There is existing demand for student housing across London, and specifically within the London Borough of Wandsworth and Nine Elms. London has the single largest student population with 16% of the UK's students. The London Plan (2020) recognises there is a London-wide target of 3,500 Purpose-Built Student Accommodation (PBSA)beds a year which boroughs collectively should contribute to.  We expect the Nine Elms and Battersea area of Wandsworth to be one of the key contributors as it is an Opportunity Area and within in the Central Activities Zone (CAZ). Furthermore, by virtue of its inner London location and high PTAL (which is set to improve further through the Northern Line Extension at Battersea in 2021), it is an attractive location for students as it is within a reasonable catchment for a number of Higher Education Institutions.  Under the existing public transport infrastructure, it is estimated that there are 50,740 students requiring a bed space within a commutable distance of the Site leading to a student to bed ratio need of 2.8 students to 1 bed. This highlights a significant undersupply of student accommodation. This is set to increase further once the Northern Line extension is operational as it opens up the Site to more Higher Education Providers. In this instance, the demand pool of students requiring a bed space is set to increase to 115,140 against a supply of 31,190 beds. This increases the student to bed ratio to 3.7 students to 1 bed.	Support for the allocation is noted.  Policy LP30 (now LP28) supports the provision of Purpose-Built Student Accommodation, subject to addressing all requirements set out in the policy. While it is not disputed that the site might be an appropriate location for the provision Purpose Built Student Accommodation, development proposals should be assessed on their own merits at the time when a planning application is submitted. The circumstances of the site might change over the plan period, and it is therefore not proposed to allocate the site for Purpose Built Student Accommodation.	No change to the Local Plan required as a result of this representation.
DTZ Investors		Neil Wells	Quod	1500	5.40	Site Description  Please note that the site no longer comprises BMW Nine Elms, and this should be removed.	Agreed.	Site description has been amended.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
DTZ Investors		Neil Wells	Quod	1501	5.41	Site Area—please note that the site area is 0.81ha as per planning application ref. 2015/6813, not 0.42ha.	Agreed.	Site Area has been amended.
	Wandsworth Cycling (London Cycling Campaign)			205	5.46	replace 2 x "should" with "are / is required to"	Comment noted.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			206	5.51	Proposals should also improve pedestrian connections between the new linear park and the existing residential estates to the south west.  And must incorporate provision for a safe cycling along the route	Comment noted.	No change to the Local Plan required as a result of this representation.
DTZ Investors		Neil Wells	Quod	1502	5.51	Design Requirements  Movement – Establish a wayfinding strategy, connecting and promoting active use of new public spaces through integrating facilities and events. Enhance the pedestrian crossing between Nine Elms Lane and on to the riverside. Proposal should also improve pedestrian connections between the new linear park and the existing residential estates to the south west, <u>subject to site ownerships and deliverability.</u>	Comments noted. The existing text is considered sufficient.	No change to the Local Plan required as a result of this representation.
DTZ Investors		Neil Wells	Quod	1503	5.52	Movement –This scheme will be expected to contribute to TfL's Nine Elms Corridor scheme which provides a holistic approach to transforming Nine Elms Lane.  We would welcome further discussion with the Council with regards to TfL's Nine Elms Corridor as we understand that Phase 1 (Duchess Railway Bridge and Sleaford Street) is subject to detail design and it would be more appropriate to specify specific works relevant to this site in the site allocation, rather than a generic reference to a strategy. This will aid the soundness of the allocation. This could also be included within the supporting text of PM3 Nine Elms, the overarching Policy which supports all of the Site Allocations within Nine Elms.	Comments noted.	The Site Allocation has been amended to provide additional detail.
DTZ Investors		Neil Wells	Quod	1504	5.55	Tall Buildings –In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall building clusters and/or landmarks, and the height at which buildings will be considered as 'tall' is 8 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP4.  The site currently has planning permission (ref. 2015/6813) for residential buildings ranging from 5 to 18storeys. It would seem appropriate to make reference to this in the policy.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			699	5.56	TfL would like to see a requirement for this site to be car free. Existing parking on the site should be removed, thus making better use of land and encouraging mode shift.	LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.  Existing car parking will be considered on a case by case basis.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			207	5.60	Both need to be requirements	Comment noted.	No change to the Local Plan required as a result of this representation.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1125	5.66	Battersea Design and Technology Quarter Site Allocation  The draft site allocation is supported in principle and Workspace can confirm that the site is deliverable in the short to medium term as confirmed through pre-application discussions held with the LBW.	The wording used for the Built Form design requirements is considered appropriate. The wording of Tall Buildings design requirement was amended as a result of changes to policy LP4.  The wording used for the Movement development consideration is considered appropriate.	Design Considerations Public Transport and Active Transport have been amended.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Notwithstanding this, a number of suggested amendments to the proposed wording of the site allocation are included below to ensure that the site can provide the maximum quantum of sustainable development in line with planning policy.</p> <p>The below comments are made following the structure of the draft allocation. The proposed revisions to the text are highlighted on a tracked change version of the draft site allocation which is included at Appendix I.</p>	Comments relating to the appropriateness of office uses above the ground floor are responded to in comment # 1126.	
Josephine Vos	Transport for London			701	5.68	<p>TfL strongly supports the requirement to retain and protect Battersea bus garage. The site is operated by Abellio and has a capacity of 245 vehicles, which provide TfL bus services. It is in an ideal location on designated Strategic Industrial Land and, as it is not surrounded by residential development, there are no issues relating to the unsocial operating hours. The garage has good access to strategic roads which is vital for the operation of a reliable and cost-effective bus network and public transport, which supports staff to get to and from work. The garage is a significant employer in the area. For everyone bus, generally three to four people are employed including bus drivers, engineers, cleaners and garage staff. The garage is required now and in the foreseeable future. If surrounding sites are redeveloped, our strong preference would be for it to stay where it is. If it were to be moved, it would need to be in the immediate vicinity. If the site were to be redeveloped or relocated, capacity must be maintained or increased. On top of additional capacity for future growth, the move to a zero-emission bus fleet means that capacity will be lost on site. As such, we would expect current capacity plus an additional 20per cent capacity for growth, and to accommodate the electrification of the fleet.</p> <p>Any proposals affecting the bus depot, such as mixed-use redevelopment incorporating bus garage facilities or finding alternative sites will need to ensure that capacity, operational efficiency and flexibility are maintained and enhanced, and that continuity of operation is secured.</p> <p>Battersea bus garage also provides parking facilities for National Express coaches between scheduled services. Some of these coaches have been displaced by the closure of the 24-hour facility at New Covent Garden Market. Layover facilities for coaches continue to be required and London Plan policy T3 should be followed if any changes are proposed.</p> <p>We welcome support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal or along Queenstown Road.</p>	Comment noted. The character of the area as an industrial zone will be maintained and the existing uses are explicitly protected within the plan. See LP 37.	No change to the Local Plan required as a result of this representation.
The Arch Company	The Arch Company	Alex Christopher	Director Turley Associates	1557	5.68	<p><b>See attachment on comment 1556 for full context and graphics</b></p> <p>However, it is considered that the emerging policy as well as Site Allocation NE8 are both flexible and ambitious and take account of the 'bigger picture'. In relation to the existing bus depot, the Draft Local Plan notes on page 105 that it "should be retained and protected, which can include [its] re-provision within SIL in order to provide more efficient site use and access". Whilst our client fully agrees that the bus depot may be re-provided and/or the land intensified to provide the existing amongst other, alternative uses, i.e. making most efficient use of SIL in line with Policies E5 and E7 of the Publication London Plan (2020), it should also be acknowledged that lease arrangements and/or need and demand for such a use and in this location may change in the future. As such, the policy and related site allocation should be flexible enough to allow for an intensification of the site whilst the bus depot use may be re-located, incorporated into a wider redevelopment and/or be surplus to requirements.</p> <p>Given the site's overall footprint (and low density in terms of built environment), it may become a key asset for intensification, potentially allowing other parts of the SIL to be released for alternative uses (in addition to those already set out in Draft Policy LP37 (Part B4)) in line (and to ensure compliance) with the requirements and approach towards intensification, co-location and substitution</p>	<p>Support for the site allocation noted. Should existing B2 industrial uses located within the SIL, such as the bus depot, become surplus to requirements it would be appropriate to provide the intensification of alternative industrial uses (in accordance with London Plan E5 and the ambitions of the BDTQ Economic Appraisal and Development Framework).</p> <p>It is not the Council's intention to pursue the release of the SIL within this location; instead, a local approach is taken to the intensification of industrial use to help meet demand, which builds upon the BDTQ EADF study and the previous Industrial Business Park designation.</p>	Amend the 'Uses' section of 'Development Considerations' for the Battersea Design and Technology Quarter Site Allocation cluster to note that, should the existing B2 uses, (including the Abellio site) become surplus to requirements, these should provide for intensified industrial uses.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						set out in Policy E7 of the Publication London Plan. This should also be reflected in Draft Policy LP37.		
The Arch Company	The Arch Company	Alex Christopher	Director Turley Associates	1558	Policy LP37	<p><b>See attachment on comment 1556 for full context and graphics</b></p> <p>Whilst the general approach to height within the BDTQ, and particularly in relation to the above site allocation (defined as 8 storeys on page 108) (this should be reflected as such in Appendix 2 of the Draft Local Plan), is seen positively, it should also be recognised that the wider area is –in certain parts –relatively free from heritage and/or environmental constraints and may allow for taller elements where this is subject to robust townscape testing and assessment against emerging Policy LP4 of the Plan (where it is considered that the definition of a 'tall building' should follow the approach of the Publication London Plan, i.e. be a minimum of six storeys, rather than five, as is proposed for certain parts of the borough).</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1126	5.71	<p>Development Considerations – Uses</p> <p>The text should clearly set out that office space (Use Class E) would be supported at above ground level. The current wording seeks to protect and provide industrial uses within ground floor units, however, there is no reference to the other uses which are supported within this location. It is therefore suggested that the text is strengthened to ensure that it is clear that office space can be delivered here.</p>	The 'Site allocation' sets out the principle of office uses in these, locations, and the 'Uses' section under 'Development Considerations' sets out relevant further information - in this instance that industrial uses are required on the ground floor of buildings, unless otherwise specified. That notwithstanding, it is considered appropriate to note for clarity that office and industrial uses will be appropriate on upper floors, given the unique approach to the BDTQ within the SIL.	Amend the 'Uses' section of 'Development Considerations' to include reference to the appropriateness of office and industrial uses on upper floors.
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1225	5.71	<p><b>See attachment for full context and associated images on comment 1224</b></p> <p>Area Strategy for Nine Elms (Battersea Design and Technology Quarter Site Allocation)</p> <p>The BDTQ is allocated in the Draft Local Plan as a key site to support the implementation of policies set out in the Draft Local Plan, as well as the vision and objectives of the Nine Elms Area Strategy (Policy PM3), which is one of the eleven Spatial Strategy Areas identified in the Draft Local Plan. The BDTQ is allocated for a mix of workshops and studio uses, office space for SMEs, open space and industrial uses, including yard space and amenity space. Battersea Studios falls within cluster 'NE8: Silverthorne Road, SW8.'</p> <p>As mentioned above, Schroders is supportive of the approach to BDTQ and its allocation within the Draft Local Plan for a mix of uses.</p> <p>However, Schroders proposes an amendment to be made under the proposed 'Uses' of this site allocation, to include reference to the suitability of office uses within the BDTQ. It suggests the following amendment to the first sentence: "industrial uses must be provided within ground floor units, unless specified within the BDTQ Framework (e.g. hub sites), with the opportunity for office floorspace on upper floors." This change would make the policy consistent with Section 6.3 'Mix of Uses and Scale of Development' of the BDTQ Framework and with draft Policy LP37.</p>	Support for the BDTQ is noted. The 'Site allocation' sets out the principle of office uses in these, locations, and the 'Uses' section under 'Development Considerations' sets out relevant further information - in this instance that industrial uses are required on the ground floor of buildings, unless otherwise specified. That notwithstanding, it is considered appropriate to note for clarity that office and industrial uses will be appropriate on upper floors, given the unique approach to the BDTQ within the SIL.	Amend the 'Uses' section of 'Development Considerations' to include reference to the appropriateness of office and industrial uses on upper floors.
Safestore		Matthew Lloyd Ruck	Planner Savills	1385	5.73	<p><b>See attached to comment 1382 the full representation for context</b></p> <p>NE7 – Ingate Place's Open Space</p> <p>The site allocation NE7 (Ingate Place) is discussed on page 105 and outlines the expectations of proposed development at Ingate Place, which includes a shared amenity yard.</p> <p>We recognise the opportunities for place-making through public realm improvements. However, we would suggest that these improvements are not prescribed as they currently are within the site-allocation. We consider it to be overly prescriptive to suggest what public realm improvements should be placed on private land and that a flexible approach should be taken to enable the most optimal use of a site to be brought forward.</p>	The open space will enhance the suggested/ proposed new vehicular route which connects to Havelock Terrace and is important for the improved amenity of the area. The existing wording is considered to be sufficiently flexible.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Safestore place huge value on the site as a self-contained, secure unit. Having an increased footfall through the site would be problematic to the operations of the Safestore. Thus, we consider that the open space described within the site allocation should be removed from the site allocation.		
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1127	5.74	Public Transport  The wording requires proposals within the Havelock Terrace site to provide road space with financial contributions towards TfL's Nine Elms Corridor proposal. It is suggested that more flexibility is added so that proposals "may" be required to provide road space to acknowledge that this may not be possible for all development proposals.	Comment noted. LP 51 makes clear the need for new developments to contribute towards 'safe, sustainable and accessible transport solutions'. Active transport as well as public transport is central to this aim. The wording on Havelock Terrace reflects this commitment.	No change to the Local Plan required as a result of this representation.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1128	5.75	Active Travel  This seeks contributions to upgrade pedestrian routes and improve accessibility, however, it is suggested that the wording should be updated to note that they 'may' be required on the basis that any obligation will need to meet the relevant lawful tests i.e. a suitable scheme may not be identifiable or deliverable at the time of any future application being submitted.	Comment noted. It is understood that all obligations will be required to meet relevant lawful tests and is not necessary to be included within the site allocation.	No change to the Local Plan required as a result of this representation.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1129	5.78	Design Requirements – Built Form  This suggests that building frontages should be provided on to Bradmead, Palmerston Way and Havelock Terrace, which is supported, however, greater flexibility should be provided where site constraints do not allow this. Therefore, "where possible" should be added to the wording to ensure that proposals can still be supported where it is not possible to provide frontages across the three roads.	The wording used for the design principles is considered appropriate.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			208	5.82	If the tunnel is feasible, it should be a requirement	Comment noted.	No changes to the Local Plan are considered necessary.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1130	5.82	Movement  The draft allocation wording states that connections to the Havelock Terrace site across Battersea Park Road should be enhanced. It is suggested that this wording should be amended slightly to ensure that opportunities to enhance connections are explored as it may not be possible for each site along Havelock Terrace to enhance connections across Battersea Park Road. Similarly, the requirement for future development to improve accessibility and connections to Queenstown Road Station should be more flexible, as there may not be opportunities to improve accessibility. Instead, it is suggested that the wording should encourage development to aim to improve accessibility, where appropriate.	Comment noted.	Design Requirement Movement has been amended to require developments to enhance accessibility to the site and where appropriate enhance connections across Battersea Park Road to the site.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1131	5.84	Tall Buildings  The wording of the allocation should be updated to clearly demonstrate that the site is suitable for a tall building. This is critical given the changes to the Publication London Plan Policy D9 which requires that tall buildings are located in locations identified as being suitable within a development plan.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1226	5.84	<b>See attachment for full context and associated images on comment 1224</b>  The Site Allocation also refers to Identity and Architectural Expression and Tall Buildings. Part A.2.9 and Figure 290 of the Council's Urban Design Study (December 2020), which forms part of the Draft Local Plan evidence base, identifies the potential for a taller building on the Battersea Studios site. Mention should therefore be made under 'Built Form' and/or 'Identity and Architectural Expression' for the	Design requirements set out whether the site has potential for tall buildings. It is not necessary to repeat that in other design requirements.  Comments noted regarding the economic contributions of Battersea Studios. Site Allocation NE8 deliberately clusters a number of different sites, including Battersea Studios, to help keep this concise. In line with this, it is not necessary to refer to the economic role Battersea Studios plays within the text of the Local Plan.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>opportunity to have a taller, distinctive and landmark building at Battersea Studios, within the NE8 Site Allocation.</p> <p>Finally, it is considered that the NE8 Site Allocation should mention the existing Battersea Studios site as an important campus for the economy of the area.</p>		
Josephine Vos	Transport for London			702	5.85	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1452	5.85	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Allocation NE10: Middle Wharf</p> <p>The proposed allocation is for an operational safeguarded wharf with potential for residential led mixed use development above including commercial/business uses, and that any proposals for mixed use development will need to ensure that they do not have a negative impact on the operation of the safeguarded wharf, including maintaining appropriate access arrangements and ensuring that the operational capacity of the wharf is retained or enhanced. As noted above it must be made clear as part of the allocation that the key part of any redevelopment is for the continued safeguarding of the site as an operational wharf for waterborne freight cargo handling. In addition, the allocation states that in order to maximise the potential for this site will require further discussions with relevant parties, in particular the PLA and the GLA, this is welcomed.</p> <p>With regard to other site allocations (ME1, NE3 &amp; NE5) in this cluster, it must be noted that the design of any proposals for these allocations ensure they take into consideration the proximity of the nearby safeguarded wharves.</p>	<p>Agree with this comment, see LP43.</p> <p>The site allocations NE1, NE3, and NE5 are in a separate cluster which NE10 is not apart of.</p>	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1633	5.85	<p>See attachments on 1615 for more detail</p> <p>NE10 Middle Wharf, Nine Elms</p> <p>Development along the Thames riverside must establish a Biodiversity Net Gain and should aim to enhance the banks of the Thames to provide estuary edge habitats. Where safe guarded wharfs prevent enhancement as part of the scheme, proposals should consider terrestrial improvements and offsite enhancements that could provide net gains for the River Thames.</p>	<p>LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.</p> <p>Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.</p>	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			209	5.91	It is <b>proposed required</b> that Nine Elms Lane <del>should be</del> enhanced to overcome the hostile environment for pedestrians and cyclists that currently exists	Comments noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			759	5.94	NE12 New Covent Garden Market - Entrance Site, SW8. We strongly support the proposal for this and NE2 to be considered as complementary sites. The general point about the importance of the design of this as a gateway site applies here.	Comments noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			703	5.94	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.	No change to the Local Plan required as a result of this representation.
	Covent Garden Market Authority	Mr Philip Robin	Consultant Jones Lang Lasalle	1099	5.94	<p>Site Allocation NE12</p> <p>CGMA supports Site Allocation NE12 that confirms access to the NCGM site from Battersea Park Road will be retained and should be integrated into a wider network of streets with scope for being made more pedestrian friendly, which would create a more attractive gateway into NCGM</p>	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Wandsworth Cycling (London Cycling Campaign)			210	5.99	Requirement to include safe walking and cycling access	Comments noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			704	5.109	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.	No change to the Local Plan required as a result of this representation.
May Hale				1606	Map 5.1	See attachment for full representation.	<p>The proposed Nine Elms-Pimlico Bridge shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. This is considered appropriate at this stage of the Local Plan.</p> <p>The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. The preferred location for the northern landing site is to the west of the boat house and Pimlico Gardens, so will not adversely affect these assets. See the stage 2 report for more detail. Whether discrepancies exist between the numbers reports during the study and consultation events is not a Local Plan matter. Consideration of a non-Bridge option is also not a Local Plan matter.</p> <p>Paragraph 31.8 of the newly adopted Westminster Local Plan states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.</p> <p>The theoretical numbers are intended as a guide to understand the need for the bridge and the actual number of users can never be understood and all assessments are predictive and not definitive.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.</p> <p>In order to refine the pedestrian and cycle demand forecasts at Stage 3 additional and updated data and information will be required. This is expected to include undertaking a new questionnaire survey on Vauxhall and Chelsea bridges and travel surveys of various Nine Elms developments which have recently been completed in order to provide updated information on existing desire lines and travel patterns in the local area. Additional pedestrian and cycle counts will also be undertaken in order to provide a better indication of current pedestrian and cycle demand in the local area</p>	No change to the Local Plan required as a result of this representation.
Mark Hale				1607	Map 5.1	See attachment for full representation	<p>The proposed Nine Elms-Pimlico Bridge shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. This is considered appropriate at this stage of the Local Plan.</p> <p>The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. The preferred location for the northern landing site is to the west of the boat house and Pimlico Gardens, so will not adversely affect these assets. See the stage 2 report for more detail. Whether discrepancies exist between the numbers reports during the study and consultation events is not a Local Plan matter. Consideration of a non-Bridge option is also not a Local Plan matter.</p> <p>Paragraph 31.8 of the newly adopted Westminster Local Plan states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.</p> <p>The theoretical numbers are intended as a guide to understand the need for the bridge and the actual number of users can never be understood and all</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>assessments are predictive and not definitive.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.</p> <p>In order to refine the pedestrian and cycle demand forecasts at Stage 3 additional and updated data and information will be required. This is expected to include undertaking a new questionnaire survey on Vauxhall and Chelsea bridges and travel surveys of various Nine Elms developments which have recently been completed in order to provide updated information on existing desire lines and travel patterns in the local area. Additional pedestrian and cycle counts will also be undertaken in order to provide a better indication of current pedestrian and cycle demand in the local area</p>	
Mr Christopher Buck				407	Map 5.2	<p>A bridge will land, on the Westminster side, at the only Thames river adjacent garden in the Pimlico area.</p> <p>The trees in Pimlico gardens have been granted listed status. Any engineering efforts to build a bridge will inevitably lead to environmental damage.</p>	<p>Before being constructed the Bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the southern landing zone and a location can be finalised.</p> <p>Including the preferred site in the Local Plan will provide greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.</p> <p>There will be further consultation with residents and businesses, Londoners more widely and other key stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.</p> <p>There is also a dedicated website at this address: <a href="http://www.nineelmspimlicobridge.co.uk/">http://www.nineelmspimlicobridge.co.uk/</a></p>	No change to the Local Plan required as a result of this representation.
Ms Sarah Wilson				625	Map 5.2	<p>I LIVE* ON HOUSEBOAT MARY. MORRED BY THE EMBANKMENT (TIDEWAY WALK) AT THE WESTERN END OF NINE ELMS PIER. HAVE ALREADY HAD TO ENDURE, THE NOISE, DIRT &amp; DISTRUPTION OF THE TIDEWAY TUNNEL PROJECT AND CANNOT WAIT FOR IT TO END SO THE TEMPORARY PIER &amp; CONNECTING BRIDGE WILL BE DISMANTLED &amp; THE CURRENTS THEY CAUSE WILL GO. SO THE IMMEDIATE CONSTRUCTION OF A PERMANENT PEDESTRIAN &amp; CYCLE BRIDGE ACROSS THE THAMES AT LOCATION 4C WILL BE VERY DETRIMENTAL TO MY LIFE FOR THE FOLLOWING REASONS:</p> <ul style="list-style-type: none"> <li>• NOISE POLLUTION – FROM THE SIGNIFICANT AMOUNT OF PEOPLE ON THE EMBANKMENT</li> <li>• LOSS OF PRIVACY, CAUSED BY THE SIGNIFICANT INCREASE OF PEOPLE ON THE BRIDGE &amp; TIDEWAY WALK (AND LITTER THROWN IN THE RIVER &amp; ON THE EMBANKMENT)</li> <li>• LESS SECURITY WHEN ACCESSING THE ENTRANCE TO NEP</li> </ul> <p>DISRUPTION DURING CONSTRUCTION – PROLONGED PILING &amp; RIVER TRAFFIC</p> <ul style="list-style-type: none"> <li>• LOSS OF RIVER VIEWS &amp; ASPECT (ESPECIALLY AT SUNSET)</li> <li>• DETRIMENTAL INCREASE OF RIVER TRAFFIC – ESPECIALLY WHEN NEP BOATS HAVE TO BE MOVED FOR ESSSENTIAL DRYDOCKING &amp; MAINTENANCE.</li> </ul> <p>*AND REGULARLY WORK AT HOME.</p>	<p>Before being constructed the Bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the southern landing zone and a location can be finalised.</p> <p>Including the preferred site in the Local Plan will provide greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.</p> <p>There will be further consultation with residents and businesses, Londoners more widely and other key stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.</p> <p>There is also a dedicated website at this address: <a href="http://www.nineelmspimlicobridge.co.uk/">http://www.nineelmspimlicobridge.co.uk/</a></p>	No change to the Local Plan required as a result of this representation.
Jamie Darke				851	Map 5.2	<p>I am both the owner of the three flat houseboat ZEB1 and the associated mooring right till 2053 (renewable), and a director-shareholder of Nine Elms Pier Ltd. I am retired and depend on the letting income from ZEB1. As director-shareholder, I have a responsibility for the welfare of the 40-60 people living in the marina, the value of assets and the viability of the company. Option 4C will</p>	<p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option and along with the Stage 1 and 2 reports, presents evidence of the predicted demand for the bridge. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be</p>	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>not only require the removal of one mooring, and the associated loss of income over 30 years, but will blight a further four boats at the upstream end, impacting adversely on their quality of life and the value of their assets. The same holds good for other residents, though less dramatically, and for NEP Ltd. Why?</p> <p>Light pollution due to lighting of the bridge at night; noise pollution due to the immense increase you predict of pedestrians and cyclists on Tideway Walk and the bridge; the associated loss of privacy, particularly from people looking down onto the boats from the bridge; litter; security due to increased numbers; loss of amenity, in particular river views and aspect, and tranquillity.</p> <p>Not to mention disruption. We have had to endure the Thames Tunnel works with 24/7 working either end and in front of our pier, with attendant noise, light and to a lesser extent dust pollution. No sooner is that finished, and people's lives return to normal than you propose more years of misery, with piling, river and land construction traffic, noise, light, dust all over again. Boat owners are prisoners in that they cannot either move to other moorings, which are scarce, or realise the value of their asset. Whereas TT and I imagine you, would compensate landlords for rent loss, people who have to realise their asset at a vastly reduced market value are uncompensated, and NEPL has not received any money for the loss of mooring income from moorings that have had to be removed. These will be issues we shall wish to negotiate, if needs be through the courts, if your project goes ahead.</p> <p>More generally, there is an adverse impact on river navigation due to the bridge. But I must also question whether the bridge is needed. There are ample crossings between the north and south banks in the vicinity. This smack of a vanity project where the costings have been estimated on build but with no figures on the affordability of maintaining the bridge in the future. Who pays? If it's the council then council taxes will have to be raised.</p> <p>Residents have not had any disclosure on this and so the choice you present them is skewed. The scandalous farce of Hammersmith Bridge is a case in point - which matters to me as it has caused me to wait longer than advisable to have my boat's hull maintained in the only yard capable of doing so, which is upstream of the bridge - where the council may have to contribute £64M of the £140M repair bill, and the dispute with the other parties over the amounts has put it out of action for years.</p> <p style="text-align: center;">For the above reasons I oppose 4C.</p>	<p>mitigated.</p> <p>The council is keenly aware of the disruption the bridge would cause to the residents of Nine Elms Pier. The design of the bridge is not yet confirmed and within the stage 2 report multiple designs are visualised. One design includes using a linear ramp on the southern landing site which will reduce the impact on the residents of Nine Elms Pier. The Kirtling Street Masterplan provides more details on what this could look like.</p> <p>If the bridge goes ahead it will have to secure full planning permission via the creation of a site-specific design aimed at addressing the issues at the southern landing zone. Community consultation will be part of this process. There is also a dedicated website at this address: <a href="http://www.nineelmpimlicobridge.co.uk/">http://www.nineelmpimlicobridge.co.uk/</a></p> <p>There was an extensive consultation process throughout the creation of the Stage 1 and 2 reports with 783 feedback forms being collected for Stage 2 alone. However, given the project will still need to gain planning permission if it is to go ahead, there is plenty of scope for residents to influence the project.</p>	
Mrs Celia Scott	Dolphin Square Preservation Society			997	Map 5.2	<p>These comments refer to the proposal to build a new bridge from Nine Elms to Pimlico. This was opposed widely in Westminster City Council and would you please remove the references to the Bridge in your Draft Plan. The objections remain as follows:</p> <ol style="list-style-type: none"> <li>1. It would not be acceptable to spend public money on a bridge of this location within a short distance from the already existing Chelsea and Vauxhall bridges.</li> <li>2. It would overwhelm and significantly damage one of the only remaining public green spaces in Pimlico where the gardens top of St George's Square is now listed Grade 2</li> <li>3. It would destroy the open views of the Thames at this location along the river forever.</li> <li>4. It would have a negative impact on the South Westminster community, casting heavy shade along the embankment overshadowing the area and ruining the ? and health enhancing gardens of Pimlico.</li> <li>5. Public money should in preference be used to support local Wandsworth services, leisure centres, parks road and public toilet facilities, particular in view of the financial difficulties caused by the pandemic.</li> </ol>	<p>Paragraph 31.8 of the newly adopted Westminster Local Plan states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.</p> <p>The Stage 1 and 2 reports address many of the concerns raised here. In brief:</p> <ul style="list-style-type: none"> <li>• the gap between Chelsea and Vauxhall bridges is one of the largest gaps between bridges in London and combining this with the modelled transport need, a bridge is deemed to be appropriate.</li> <li>• Although the design is not finalised, the proposed landing location on the north bank is to the west of St George's Square and would not alter the green space.</li> <li>• The bridge has the potential to compliment the current townscape, and enhance the setting of Battersea Power Station and post-war aesthetic of Churchill Gardens.</li> <li>• The funding of the bridge is not currently confirmed.</li> <li>• The bridge is specifically designed to increase active travel (walking and cycling) throughout London; a key response to the challenge of climate change.</li> </ul>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						6. It is unacceptable when such importance is given to climate change and the negative impact on the environment, particularly in terms of greenhouse gases released through the mining, manufacturing and transportation of materials for this unwarranted bridge.		
Ms Adelyne De Bryas				1693	Map 5.2	I object to bringing back the idea of a new bridge between Nine Elms and Pimlico (Consultation on the Prepublication Draft Local Plan) I totally disagree with it, we don't need it as there are already a cycle way and bridge for Vauxhall very close by. But also, it will destroy Pimlico Garden and the boat house. Not to forget the cost of such an expensive bridge which is not that necessary on this side of Tower Bridge (so many close by) And lastly, i wanted to say how cheeky it was that owner's not to have been told by Wandsworth that the plan had been resubmitted, giving us a very short window of time to respond and in my case object.	The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. The preferred location for the northern landing site is to the west of the boat house and Pimlico Gardens, so will not adversely affect these assets. See the stage 2 report for more detail. If the bridge goes ahead it will have to secure full planning permission and via this process all interested parties will have opportunities to further comment on the proposals. At this stage there is no formal design or confirmed funding arrangement.	No change to the Local Plan required as a result of this representation.
Mr Christopher Buck				838	Map 5.4	A foot cycle bridge will not ease road congestion near Vauxhall. Road traffic levels (cars etc) will remain at the same level. Cyclists riding across a foot bridge are liable at some point to run someone over.  The propose landing site in Pimlico gardens contains listed trees. Building works would inevitably lead to environmental damage and pollution.  For the millions this bridge will cut cycling journeys by...one minute? I object to the bridge!!	In order to refine the pedestrian and cycle demand forecasts at Stage 3 additional and updated data and information will be required. This is expected to include undertaking a new questionnaire survey on Vauxhall and Chelsea bridges and travel surveys of various Nine Elms developments which have recently been completed in order to provide updated information on existing desire lines and travel patterns in the local area. Additional pedestrian and cycle counts will also be undertaken in order to provide a better indication of current pedestrian and cycle demand in the local area  The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.	No change to the Local Plan required as a result of this representation.
Mr Darren Bender				837	Map 5.4	As a boat owner at Nine Elms Pier, I am very concerned about the proposed location 4C of the pedestrian and cycling bridge proposed. Further disruption of such a project, on top of many years of tideway tunnel digging, will be difficult to tolerate, not just practically but also in terms of the mental health of those currently living on the boats. We will lose our wonderful view of the river. This is the reason many of us bought our boats and wanted to live at the pier. There will be a terrible loss of privacy from 10,000 people looking down at us on as they pass every day. There will be invasive light pollution from the lights on the bridge. Most of all, I am very worried that it is proposing to remove at least one boat. Losing any boat from our community radically alters such a deeply connected environment. Please consider making whatever design changes are possible, if you choose this location, to mitigate the damage to our enjoyment of our homes, and to the value of them, the disruption to our lives and to the loss of the key elements we moved here to enjoy.	The council is keenly aware of the disruption the construction of a bridge would cause to the residents of Nine Elms Pier. The design of the bridge is not yet confirmed and within the Stage 2 report multiple designs are visualised and comparatively assessed. One design includes using a linear ramp on the southern landing site to reduce the impact on the residents of Nine Elms Pier.  Before being constructed the Bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the southern landing zone and a location can be finalised.  Including the preferred site in the Local Plan will provide greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.  There will be further consultation with residents and businesses, Londoners more widely and other key stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.  There is also a dedicated website at this address: <a href="http://www.nineelmspimlicobridge.co.uk/">http://www.nineelmspimlicobridge.co.uk/</a>	No change to the Local Plan required as a result of this representation.
L Cox	Pimlico FREDA			1590	Map 5.4	LOCAL PLAN REVIEW - WANDSWORTH INCLUSION OF PROPOSED NINE ELMS PIMLICO BRIDGE  Pimlico FREDA is an umbrella company representing c16 individual residents associations within Pimlico, Westminster.  It has only recently been brought to FREDA's attention that Wandsworth Council have included within the draft local plan, a policy to deliver the Nine Elms – Pimlico Bridge.  As you are aware, there is considerable Westminster Council cross party opposition to this bridge and Westminster residents do NOT want a bridge.  Wandsworth Council have NOT consulted with FREDA nor the Pimlico Neighbourhood Forum nor Westminster residents before including this	Paragraph 31.8 of the newly adopted Westminster Local Plan states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.  If the bridge goes ahead it will have to secure full planning permission and via this process all interested parties will have opportunities to further comment on the proposals. At this stage there is no formal design or confirmed funding arrangement.  In terms of the impact of the bridge of residential and amenity, the design of the bridge is still in its initial phases and part of the Stage 3 assessment will be to consider the impact of additional trips being made to both the north and south side of the proposed bridge.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>proposed policy. That is quite plainly outrageous considering half of the bridge would be in Westminster! In addition, there is no provision within Westminster's City Plan for this bridge.</p> <p>Any such proposed policy, i.e. a river crossing must have support from BOTH sides of the River as repeatedly confirmed by The Mayor and Mayors Office in replies to posed questions. This Wandsworth proposed policy does NOT have the support of Westminster, Councillors nor residents.</p> <p><b>Residential</b></p> <p>Pimlico is acknowledged as a primarily quiet residential area. The proposed bridge will transform peaceful residential roads (secondary routes as defined in the Pimlico Conservation Audit) into commuter "rat runs" with established infrastructure that simply would not cope with the increased traffic of c 12,000 daily trips.</p> <p>The proposed number of trips will lead to a serious detriment to residential amenity with disruption and an overwhelmed transport system as trips will be concentrated at rush hours</p> <p><b>Public Amenity</b></p> <p>Any bridge will reduce public open space and therefore harmful to public amenity, the loss of statutory protected views and loss of the riverbank in an area that is already identified as deficient in natural biodiversity. A sudden influx of people will result in the increase of crime and disorder.</p> <p>It appears that this Wandsworth driven scheme will only benefit Wandsworth and without consultation/promised collaboration, Wandsworth Council seem hell bent to plough on with no regard to Westminster residents and neighbouring boroughs. The Nine Elms Pimlico Bridge is also highly unlikely to obtain the necessary planning consent from Westminster Council.</p> <p>Please amend the draft plan and remove any mention/policy of this "Bridge to nowhere".</p>		
Metropolitan Police Service	Metropolitan Police Service			1603	Map 5.6	<p>Dear Sir/Madam</p> <p>'Pre-Publication' Draft Local Plan(Regulation 18)</p> <p>Lambert Smith Hampton (LSH) has been instructed by the Metropolitan Police Service (MPS) to make representations to the above consultation. This representation concerns the proposed allocated site NE4, the MPS' ability to receive contributions via S106 agreements and CIL payments and their emerging neighbourhood police facility infrastructure requirement.</p> <p>NE4 Metropolitan Police Workshop, Ponton Road, SW8</p> <p>It is understood that site allocation (Site 31) identified within the adopted Site-Specific Allocation Document has now been carried forward to the emerging Draft Local Plan under Site NE4.</p> <p>The site is owned by the Mayor's Office for Policing and Crime (MOPAC) and operated by the MPS as a workshop facility. In response to the growing number of officers, the MPS is reviewing its current Estate Strategy including on-going disposals. At present, it appears that the site is likely to be retained for operational use at least for the medium short term. The MPS are therefore keen to ensure that surrounding allocations will not have detrimental impacts on the security and operation of the MPS facility.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	<p>Site Allocation NE2 and NE12 amended to ensure that they do not have a detrimental impact on the security and operation of the MPS Facility.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						In the event that the site is disposed and redeveloped, the MPS requests that the site is allocated for residential use only with the height increased to 11 storeys and above to reflect the current allocation.		
Dr David Curran	Lavender Hill for Me			1156	Map 5.7	<p>Proposed new Battersea Design and Technology Quarter designation: Support this proposal and the vision that underpins it. We support the proposals to enlarge the area of the previous 'Industrial Business Park' to a more continuous area with amended boundaries</p> <p>We propose that the allocation should be slightly extended to encompass the London Concrete site (illustrated in blue in the image below). We appreciate that this particular site is likely, in the near term, to remain in industrial use and probably in aggregate / concrete processing –however we believe there are merits in it being included within the site allocation: (1) it is well connected to the remainder of the site thanks to a row of unusually high and open high and open railway arches, to the extent that one tenant occupies both sides as a continuous site –so its economic future is inherently tied to the rest of the site and any redevelopment is likely to cover both sides of that railway viaduct; while at the same time it is completely islanded from other locations and the use of this triangle will inevitably affect the wider designated site, so merits holistic consideration, (3) as noted in the recent study underpinning this new allocation the two concrete batching operations could beneficially be reorganised within the site as part of a wider development, and this site may form part of that consideration, (4) the blue triangle site includes a large area of aggregate storage and does have space for significant densification and intensification of use while still retaining operational concrete processing. We note that this site was not explicitly included in the study that led to the designation, however the reasons for this non-inclusion are unclear (particularly given that the railway depot –which is less likely to see coordinated development than this triangle of land –is included). We believe this small extension of the designation should be uncontentious.</p> <p>We note that the area in the map on page 105 of the Local Plan does not match the area proposed elsewhere in the document –as the railway depot in area NE8 is not included, we suggest that for the avoidance of doubt it should be included. We agree with the points made elsewhere in the draft plan noting that while the railway development is not likely to see near term development, it does make sense for it to be included given the scope for medium term oversite development, and to allow a more coordinated development of the overall site.</p> <p>We agree with the broad “8 storey” tall building height, which appears reasonable for these locations, provided the frontages and interactions with residential streets adjacent to the areas are carefully considered.</p> <p>We support the proposed restriction on further residential conversion at the Havelock Terrace NE6 site.</p> <p>In terms of access &amp; active travel, we believe that the site allocation should explicitly promote the reopening of the existing pedestrian footbridge between the south eastern corner of the site and</p> <p>Portslade Road / Heathbrook Park, which is currently only used by the businesses, but which could significantly improve access to the site for employees and visitors (a point which was also identified in the We Made This study).</p>	<p>Support noted.</p> <p>The extension of the Battersea Design and Technology Quarter boundary, however, is not considered appropriate – indeed, the comments have highlighted the need for greater clarity over this area, and the contraction of the boundaries.</p> <p>The BDTQ is situated within the Queenstown Road, Battersea Strategic Industrial Location (SIL). This is a London Plan designation which gives strategic protection to industrial, logistics and related uses due to their being critical to the effective functioning of London's economy (paragraph 6.5.1) – and in which other uses are not considered appropriate.</p> <p>From a planning policy perspective, the designation (and associated site allocations) permits a deviation from this approach, allowing the mixed-use development of intensified industrial uses alongside office development (for SMEs) – see Policy LP37. This locationally-specific policy approach is intended to capitalise on investment associated with the VNEB OA, to further promote the cluster of design-based industries within the area, and – importantly – builds on the designation of part of the area as an Industrial Business Park (IBP). The latter intended to accommodate activities that need better quality surroundings including research and development, light industrial and higher value general industrial uses, thereby creating a 'buffer zone' between the adjacent Queenstown Road Conservation Area and the heavier industrial uses situated in the centre of the study area.</p> <p>The BDTQ EADF study noted that, particularly for the London Concrete site, its being bordered on three sides by railway lines realised strategic advantages for its heavy industrial use, as any potential negative impact on adjacent uses is limited/mitigated. In keeping with this, the Council intends that its current use should be retained, or that this site should provide for an alternative heavy industrial (B2) use, as supported by the London Plan. As such, it should not be incorporated within the area designated for mixed-use office development (as realised by the BDTQ designation), which would likely be incompatible with a heavy industrial use. Any reorganisation of the site should realise the intensification of industrial (only) use, which is supported under the SIL designation and the current approach (see London Plan E15). This should be clarified within the site allocation (under 'Uses'). The potential for the London Concrete and Tarmac sites to be re-provided within the SIL is recognised in the site allocation.</p> <p>Similarly, whilst the railway depot was included within the BDTQ EADF study, this reflected the desire to take a cohesive approach to the study; however, the site was considered to have 'no potential for intensification' and should therefore be removed. This was partially taken through in the Regulation 18 Local Plan, hence the discrepancy between the site allocation boundary and that shown in the Nine Elms Area Strategy. Thank you for noting this, which should be rectified. It is noted that certain other sites – such as the Abellio bus depot and the British Rail Yard (Silverthorne Road) – fell outside the IBP designation, however, were found to have high or constrained intensification potential. As such, these have been included within the BDTQ designation.</p> <p>It is agreed that reference to the reuse of the existing footbridge connecting Stewarts Lane to Heathbrook Park / Portslade Road should be included within the site allocation.</p>	<p>The railway depot should be excluded from the Battersea Design and Technology Quarter designation for the purposes of all relevant maps.</p> <p>The site allocation should be amended to specify that for the Tarmac and London Concrete sites, should their use become surplus to requirements they should be replaced with intensified industrial uses ('Uses'). Reference to the pedestrian use of the existing footbridge connecting Stewarts Lane to Heathbrook Park / Portslade Road should be included ('Movement').</p>
Robert East	Senior Planning Policy Officer LB Lambeth			1594	Map 5.7	<p>BATTERSEA DESIGN AND TECHNOLOGY QUARTER</p> <p>The Industrial Business Park designation is proposed to be removed. This will be replaced with the Battersea Design and Technology Quarter (BDTQ) designation. The BDTQ designation encompasses a larger area than the Industrial Business Park designation. (wording from Policies Map Changes Document)</p>	Comments noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The Battersea Design and Technology Quarter Cluster comprises three sites. Site Allocation (NE6, NE7, NE8)</p> <p>A mix of workshops and studio uses, office space for SMEs, open space, and industrial uses including yard space and amenity space. Further information is set out within the BDTQ Economic Appraisal and Development Framework (EADF) document (2020).</p> <p>Development Considerations Uses – Industrial uses must be provided within ground floor units, unless specified within the BDTQ EADF document (e.g. hub sites). Existing B2 industrial uses (such as the Tarmac and London Concrete sites) and the bus depot should be retained and protected, which can include their re-provision within the SIL in order to provide more efficient site use and access. Beyond the Palmerston Court site, within Havelock Terrace (NE6), which lies outside of the designated SIL and has an existing permission in place for the provision of student housing, residential uses are not permitted in any areas of the site allocation.</p> <p>Tall Buildings - In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within a local context, and the height at which buildings will be considered as 'tall' is 8 storeys. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4.</p> <p>The proposed Battersea Design and Technology Quarter would lie in reasonably close proximity to the borough boundary between Lambeth and Wandsworth. The closest of these site allocations to the boundary is NE8.</p> <p>Lambeth has no specific comments relating to the BDTQ.</p>		
Dr Asif Din				248	Policy PM3	<p>Consideration is required for existing communities particularly at Nine Elms Pier and so i raise an objection to the proposed new bridge.</p>	<p>The council is keenly aware of the disruption the construction of the bridge would cause to the residents of Nine Elms Pier. The design of the bridge is not yet confirmed and within the Stage 2 report multiple designs are visualised. One design includes using a linear ramp on the southern landing site which will reduce the impact on the residents of Nine Elms Pier. The Kirtling Street Masterplan provides more details on what this could look like.</p> <p>Before being constructed the Bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the southern landing zone and a location can be finalised.</p> <p>Including the preferred site in the Local Plan will provide greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.</p> <p>There will be further consultation with residents and businesses, Londoners more widely and other key stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.</p> <p>There is also a dedicated website at this address: <a href="http://www.nineelmspimlicobridge.co.uk/">http://www.nineelmspimlicobridge.co.uk/</a></p>	No change to the Local Plan required as a result of this representation.
A C McCarthy	Pimlico Forum			512	Policy PM3	<p>You continue to plan for high rise towers in your borough which are badly designed and overwhelm the streetscapes of Pimlico. Nine Elms clearly deserves more thoughtful development that would have regard to the impact on neighbouring areas not least Pimlico. Many of Pimlico's historic Victorian street scapes and buildings are now dominated by ugly tower development in Nine Elms and regard to this effect should be had for future plans.</p> <p>Regrettably though it is evident that you only consider your own narrow interests by your persistence in planning to build a bridge from Nine Elms to Pimlico. The extent to which and reasons why this is opposed by the residents and businesses in Pimlico and will have significant unwanted consequences here are well known to you not least being the impossibility of taking our own steps to protect and develop the northern riverside whilst subject to the blight of your plan. Residents in Pimlico and Westminster City Council object to the</p>	<p>A C McCarthy will be added to the database as a representative for the Pimlico Neighbourhood Forum and will be contacted when future consultations regarding the Local Plan take place.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						adverse effects of the proposal on Pimlico. After taking these into account together with the cost of construction and upkeep of a bridge, against its marginal benefit for such a small number of Wandsworth residents and businesses the plan should be dropped. Could we also ask that we be given more notice of consultation on the next steps of the development of your Plan so that we can give more detailed input		
Monica Tross	Secretary to planning committee  Battersea Society			756	Policy PM3	<p>Smart Growth A: All calculations of housing to be provided should show it split by tenure. Too little is affordable, there are concerns about unmediated expansion of Co-living and build to rent.</p> <p>PM3: Nine Elms</p> <p>Place Making E: Key Gateways: We have generally been very disappointed with the design of proposed developments on corner junction sites throughout Nine Elms e.g. the corner office block of South London Mail site. Remaining sites need to be treated with more robust design guidelines. This design imperative should be noted in the Site Allocation Design Requirements for those sites abutting Battersea Park Road/Nine Elms.</p> <p>Smart growth L: Urban Logistics Hubs: Excellent policy but despite the cross-reference to Policy LP51, it is not mentioned at all in Chapter 20, Sustainable Transport as a more general objective for wider areas of the borough and emphasised as something which will be actively pursued and required for development in local employments areas e.g. Battersea Design and Technology Quarter (BDTQ) and York Road/Lombard Road</p> <p>People First: H and F: There is a need to improve accessibility to Battersea Park Station not just externally but also within the station itself. It would be clearer if subheads H and F were combined and the current section I followed immediately after.</p> <p>As indicated in the Urban Design Study, the strategy should promote improved accessibility and movement throughout the separated elements of BDTQ. In particular there should be a requirement to take forward the suggested feasibility studies set out in the BDTQ Economic Appraisal and Design Framework (p 37) to provide direct links through railway arches and, where appropriate, over the rail lines.</p>	<p>Policy LP25 (now LP23) sets out a borough-wide affordable housing tenure split. Policies LP31 (now LP29) and LP32 (now LP30) set out an approach for managing proposals for co-living and Build to Rent schemes, respectively. In accordance with policy LP31 (now LP29), large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted.</p> <p>It is considered that the guidance contained under 'Design Requirements' coupled with policies LP1 and LP4 is sufficient to ensure that future schemes are of high-quality design.</p> <p>The site allocation cluster for the Battersea Design and Technology Quarter (consisting of NE6, NE7 and NE8) specifies that applications within this location should adhere to the BTQD Economic Appraisal and Design Framework guidance. More detailed guidance, under 'Movement' is also included, which references accessibility and connections to railway stations and the creation of a pedestrian and cycling tunnel. Additional wording should be added to refer to the potential pedestrian use of the footbridge connecting Stewarts Lane to Heathbrook Park / Portslade Road with regard to NE8.</p>	<p>Reference to Urban Logistics Hubs have been added to LP51 Sustainable Transport and its supporting text.</p> <p>The site allocation should be amended to refer to the potential pedestrian use of the existing footbridge connecting Stewarts Lane to Heathbrook Park / Portslade Road should be included ('Movement').</p>
Josephine Vos	Transport for London			695	Policy PM3	<p>TfL agrees with the statement in 5.11 that the area provides good potential for car free living. The presumption should be that all development will be car free and this should be clearly stated in policy PM3.</p> <p>TfL supports the Council's intention to improve connectivity and permeability for pedestrians, cyclist and public transport users. We welcome the requirement for developments to contribute towards this objective including funding and/or infrastructure to help to deliver the Nine Elms Cycling Strategy and specific projects such as the Nine Elms Lane/Battersea Park Road scheme. The proposal for a Nine Elms –Pimlico bridge is subject to further discussion with Westminster City Council before it can be progressed. TfL can provide technical advice and support but there is no commitment or funding at the present time.</p> <p>Plans for improved connections between Battersea Park and Queenstown Road stations are welcomed. Although there are no current plans to provide an all-day London Overground service to Battersea Park station, passive provision should be considered in any redevelopment. We welcome the proposals for urban logistics hubs particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p> <p>The loss of a 24-hour coach facility on the New Covent Garden Market site has caused difficulties for operators coming to London with night stops. The limited daytime parking which remains is used by commuter coaches and private hire coaches (some of which could be working on behalf of scheduled coach operators). Any further reduction in parking for coaches must be carefully considered as it will potentially have a detrimental impact. There may be a need</p>	<p>LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.</p>	<p>PM3 has been amended to remove reference to electric vans.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						to protect existing facilities and consideration given to enhancing coach parking provision (see comments on sites NE6/NE7/NE8). This will require a strategy for the medium and long term.		
Mowbray Jackson				967	Policy PM3	<p>I am writing to raise a very strong objection to Wandsworth's proposal for the Nine Elms Pimlico Bridge.</p> <p>As I have been physically absent from Nine Elms Pier, a result of the Thames Tideway Tunnel, a capital infrastructure project, I have only just been informed of this Cycle/pedestrian bridge project in the last 24 hours. Whilst my houseboat has been removed from Nine Elms Pier since January 2016, I still retain ownership of the mooring and I shall be returning my houseboat to the pier when the Tunnel project has been completed.</p> <p>I am extremely alarmed to discover that the preferred planned location for the bridge (4C) is almost directly over my mooring/houseboat. Certainly within 25 metres /80 feet of my home and subsequently will have an adverse impact on both my quality of living but a detrimental effect on the value of my property.</p> <p>Please see this brief list of my concerns:</p> <ul style="list-style-type: none"> <li>• Total loss of my river view.</li> <li>• Loss of privacy - pedestrian/cycle traffic will be overly intrusive.</li> <li>• Security.</li> <li>• Massive disruption during construction.</li> <li>• Blight</li> <li>• Noise pollution</li> <li>• Light pollution</li> </ul> <p>I also have numerous other concerns which I will elaborate on later when I've had a chance to really study this abomination.</p> <p>Please inform me of ALL developments and consultations in the future. I can't believe no-one has contacted me regarding this dire situation.</p>	<p>The council is keenly aware of the disruption the bridge would cause to the residents of Nine Elms Pier. The design of the bridge is not yet confirmed and within the stage 2 report multiple designs are visualised. One design includes using a linear ramp on the southern landing site which will reduce the impact on the residents of Nine Elms Pier.</p> <p>Before being constructed the Bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the southern landing zone and a location can be finalised.</p> <p>Including the preferred site in the Local Plan will provide greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.</p> <p>There will be further consultation with residents and businesses, Londoners more widely and other key stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.</p> <p>There is also a dedicated website at this address: <a href="http://www.nineelmspimlicobridge.co.uk/">http://www.nineelmspimlicobridge.co.uk/</a></p>	No change to the Local Plan required as a result of this representation.
Dr Alexander Edwards				992	Policy PM3	<p>I am a resident of the houseboat community located in houseboat ZEB1. As a resident of Wandsworth I fail to understand why a foot and cycle bridge is required -what problem does this bridge solve? I sense that this is a solution trying to find a problem and therefore Option 4C is flawed.</p> <p>To explain.</p> <p>There are many bridges in close proximity to the proposed location which are of 5 minutes' walk away which allow sufficient crossing. The volume of people walking over these bridges is low to medium at best and so see no reason why another bridge is required. Even predicting the next 10 years footfall would be surprised if the numbers would increase significantly, if anything I expect a decrease in footfall since there is an overall trend of those moving out of London and working remotely post-COVID.</p> <p>Of course they'll be an argument of a green agenda and a trend to zero emissions but surely a more appropriate allocation of money, as should be guided by environmental, social and governance criteria to screen these investments, would dictate that this proposal is a total waste of money. More value would be in taking the existing infrastructure and making these more</p>	<p>The proposed Nine Elms-Pimlico Bridge shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. This is considered appropriate at this stage of the Local Plan.</p> <p>The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. The preferred location for the northern landing site is to the west of the boat house and Pimlico Gardens, so will not adversely affect these assets. See the stage 2 report for more detail.</p> <p>In order to refine the pedestrian and cycle demand forecasts at Stage 3 additional and updated data and information will be required. This is expected to include undertaking a new questionnaire survey on Vauxhall and Chelsea bridges and travel surveys of various Nine Elms developments which have recently been completed in order to provide updated information on existing desire lines and travel patterns in the local area. Additional pedestrian and cycle counts will also be undertaken in order to provide a better indication of current pedestrian and cycle demand in the local area.</p> <p>Both Nine Elms and Pimlico offer a variety of services and destinations that will require those on either side to use the bridge regularly.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>cycle and pedestrian friendly which would be a significant reduction in cost and effort. Surely it would cost less than £57M at today's costs to implement these changes. Note that with 2% CPI and predicted increase in interest rates then I suspect that the financial impact would be significantly higher &gt;£100M most of which is public money.</p> <p>I would also question what you believe these people will be walking or passing through to do? Even when the new Nine Elms Park is ready there is very little space to attract the volume of people to warrant a bridge. Even those coming to Battersea Park and Battersea Power Station will no doubt be using the tube or other public transport and if walking or cycling there are existing bridges in close proximity. Perhaps it is to see the new elevated swimming pool that is not public? You would argue that it is for the people in the 26,000 houses that are currently being built but then none of these are affordable (i.e., &lt;£200 K) and those currently at Riverlight are mostly investments and therefore not occupied. On the Pimlico side there is no development and so what would attract anyone to go to that side?</p> <p>In terms of environmental impact, the disturbance, noise, traffic, light and dust will also be unpleasant even if its deemed temporary. However, the more important part is the long-term environmental impact. Seals and other wildlife use these banks as their habitat and this impact would cause irreversible damage as evidenced by the Millennium Bridge that is a terrible mess and a constantly polluted area.</p> <p>Lastly id draw attention to the lack of consideration of maintenance and repair costs that will inevitably increase the rates to meet these. Surely by taking the existing bridges, reduce the car traffic, move toward electric and making these more pedestrian and cycle friendly would result in a lower maintenance costs since transport are the root causes of the metal fatigue.</p> <p>In summary the consultation process is entirely lacking and the cost vs. benefit is outdated at best. Times have changed in the last 18 years since the initial idea was floated and given the recent COVID pandemic I would have at least thought this would draw on people's attention to more social responsibility. The consideration of the bridges location and process has moved ahead without proper consultation and with a cavalier attitude of those that this will impact at NEPL with no tangible benefit to the wider community. A more appropriate allocation of money that would benefit the community would be investment in public spaces, schools, policing, affordable housing, and housing the homeless. I'd suggest that the proposal is environmentally detrimental, socially irresponsible and lacks of robust governance. For these reasons i will be rejecting the proposal of Option 4C</p>	<p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.</p> <p>Further cost analysis will be undertaken in the subsequent stages of the project, for example analysis will be undertaken on the whole life costs of the project. This will include looking at the costs of future maintenance and how best to balance out the capital costs against future maintenance costs so that value for money over the whole lifecycle of the bridge can be achieved.</p>	
	Covent Garden Market Authority	Mr Philip Robin	Consultant Jones Lang Lasalle	1102	Policy PM3	<p>Policy PM3</p> <p>CGMA is concerned the policies for tackling climate change to realise the Council's ambition to become zero carbon by 2050 could impact upon future Market operations and therefore the future success of New Covent Garden Market. For example, Policy PM3 Part L may increase pressure for NCGM to firstly, reduce the use of vehicles and secondly, to encourage the introduction of electric vans to reduce congestion and pollution.</p> <p>As regards the first point, the role of NCGM is a wholesale fresh food market serving central London that necessitates lorries delivering produce to the market and smaller vans distributing it thereafter to Central London outlets, so the scope to reduce the use of vehicles is limited.</p> <p>As regards the use of electric vehicles, this is a matter under consideration by CGMA and traders at NCGM. However, the current capacity, range and charging technology is not currently good enough and there are no comparable vans to what NCGM tenants currently use available to purchase. Hopefully van manufacturers will address this demand in the near future. The same issues apply to HGVs, albeit they are further behind than refrigerated vans.</p>	<p>The Council's ambition to become zero carbon by 2050 is also a national aspiration 'The UK's 2050 net zero target' was recommended by the Committee on Climate Change, the UK's independent climate advisory body. Policy PM3 Part L relates to Urban Logistics Hubs for last mile deliveries and not wholesale market places. It has been updated to remove the reference to electric vehicles.</p> <p>All developments as part of the transport environment include health and safety issues which will be addressed as part of any application or transport assessment to modify them.</p>	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The use of roads varies during the day and night, and restrictions that seek to favour certain users Pre-Publication Consultation – Local Plan – Response Form Official should not necessarily apply all the time. The wholesale market has limited scope to use other non[1]vehicular transport modes. However, as the majority of movements take place during off peak night-time hours, restrictions are not necessary or justified.</p> <p>The scope to increase non-vehicular transport modes applies not only to deliveries but to people working at the market. Due to the night-time working hours, it is not feasible to travel to work by public transport or to walk. The explanatory text should make reference to the particular characteristics of NCGM.</p> <p>Whilst CGMA support the intention behind Policy PM3 People First section part E to deliver additional connectivity and permeability for pedestrians and cyclists, including a viaduct crossing for the main NCGM access road from Battersea Park Road, CGMA is concerned that there a particular circumstance related to health and safety that prevent any significant increased permeability across NCGM and this needs to be recognised in the explanatory text.</p>		
Tony Hambro	St George's Sq Residents' Association			1085	Policy PM3	<p>PM3 Nine elms p 95</p> <p>B "The Council will promote the development of Kirtling/Cringle St Riverside site, the preferred landing site for the Nine Elms Pimlico Bridge. Development proposals within this location should maximise the opportunity for the creation of green/open space that the Tideway Tunnel access shaft presents, contribute to the creation of a positive arrival experience for pedestrians and cyclists using the bridge, and improve walking and cycling connectivity in line with the VNEB Cycling Strategy" Delete please.</p> <p>PM3 Nine elms Approx. page 95</p> <p>E "In the context of avoiding unnecessary travel, the Council will seek to improve connectivity and permeability for pedestrians and cyclists. This will be achieved by delivering additional cycle routes, in line with the Cycling Strategy for Nine Elms, particularly the viaduct route crossing the Covent Garden Market Authority (CGMA) access road, and bringing forward the proposals for the Nine Elms Pimlico Bridge at the chosen location". Delete please</p>	Comments noted	No change to the Local Plan required as a result of this representation.
Tony Hambro	St George's Sq Residents' Association			1079	Policy PM3	<p><b>PM3 – Nine Elms</b></p> <p>(b) General points</p> <p>The draft plan contains</p> <ul style="list-style-type: none"> <li>Eleven separate mentions of the Nine Elms to Pimlico Bridge, mostly just repetitive, boosterish and entirely evidence-free greenwash</li> </ul> <p>The plan seeks a blank cheque drawn on taxpayers (or their grandchildren who have no vote) to pay for the Bridge</p> <ul style="list-style-type: none"> <li>Not a shred of alternative views for balance,</li> <li>No mention of the millions already wasted on aborted architectural designs etc.</li> <li>No mention of potential cost of the Bridge, previously estimated at c.£100m, nor how users might pay for it rather than taxpayers or our grandchildren repaying debt</li> <li>No mention of the ecological damage from emissions due to construction, damage to marine and shoreline habitat, trees and to residents from mess and noise of construction.</li> <li>No attempt to justify the potential Bridge in terms of cost/benefit.</li> </ul>	<p>The proposed Nine Elms-Pimlico Bridge shown in the Local Plan is indicative and the final version of the bridge is yet to be confirmed. This is considered appropriate at this stage of the Local Plan.</p> <p>Paragraph 31.8 of the newly adopted Westminster Local Plan states that any new bridge should have robust evidence of strategic transport need and create a positive impact on the urban realm at its landing sites, as well as being designed for pedestrians and cyclists only. The proposed bridge satisfies these requirements, with the requisite transport evidence being located in the Stage 1 and 2 reports, and in TfL's 2013 feasibility study.</p> <p>The proposed Nine Elms-Pimlico Bridge is still considering different options and will be required to meet all Wandsworth and Westminster policies which aim to protect and enhance open space and the environment.</p> <p>The research documented in both the Stage 1 and 2 reports, as well as in TfL's 2013 Feasibility Study show that there is strong demand for a bridge in this location with a predicted 10,600 trips per day. The preferred location for the northern landing site is to the west of the boat house and Pimlico Gardens, so will not adversely affect these assets. See the stage 2 report for more detail.</p> <p>The Nine Elms-Pimlico Bridge Feasibility Study outlines the reasons why Option 4c is the preferred bridge option, further studies to address your comments will be developed in due course. Comments about the design and impact of the bridge are noted. The bridge is still proposed and the Studies 1 and 2 provide all existing information as to how these concerns may be mitigated.</p> <p>In order to refine the pedestrian and cycle demand forecasts at Stage 3 additional and updated data and information will be required. This is expected to include</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>• No mention of the determined opposition by all parties on Westminster Council and by a substantial majority of Pimlico residents.</li> </ul> <p>c Some reasons for opposing the Bridge with reference to individual paragraphs shown below. Summary: Users wouldn't be charged so the bridge would burden our children with £100m of unnecessary debt. It would mess up Pimlico for years while it is being built. It would add to the pressure on services like the NHS Marven Medical Centre in Lupus St. It would destroy our riverside garden with its magnificent trees and upset the tranquillity of our historic urban village, for the benefit of developers peddling unaffordable luxury flats. Enough!</p> <p>10 reasons to oppose the bridge</p> <ol style="list-style-type: none"> <li>1. Misuse of Wandsworth taxpayers' money: It's a £100m folly</li> </ol> <p>TfL's 2014 feasibility study, page 24 says the capital cost would be £64m and annual running cost would be £23m. So that's £87m gone by the end of the first year. But that's all in 2013 prices, so by 2024, after adding the necessary cycle track approaches (not costed by TfL), that's at least £100m blown.</p> <ol style="list-style-type: none"> <li>2. No advantage to Pimlico, and none of the 3 landing sites proposed is acceptable.</li> </ol> <p>Wandsworth list no advantage for Pimlico residents. Pimlico Gardens, Dolphin Square and Claverton St are all unsuitable locations, all opposed by residents associations. We won't use it and don't want to pay for it either. The economic beneficiaries of the bridge would be property developers, architects and contracting engineers who are not philanthropists: one way or another the £100m would come from the public purse for their benefit.</p> <ol style="list-style-type: none"> <li>3. No business case, no health case</li> </ol> <p>There is no business case: cyclist commuters can use their new Super-highway over Chelsea or Vauxhall Bridge, literally 2-3 minutes longer, saving £100m. And no public health case: A longer bike ride, or a longer walk, is better for you!</p> <ol style="list-style-type: none"> <li>4. Potential devastation of Pimlico Gardens, Westminster's sole riverside open space</li> </ol> <p>The bridge foot would inevitably destroy many majestic, mature plane trees on the Pimlico side, plus obscuring the river</p> <ol style="list-style-type: none"> <li>5. Damage to the Pimlico Conservation Area-</li> </ol> <p>Imagine 9,000 more Nine Elms commuter cyclists each day each way (TfL's guess), racing through quiet residential Pimlico, towards/from Victoria. Add new traffic delays along Grosvenor Road as they cross it.</p> <ol style="list-style-type: none"> <li>6. Loss of Residents Parking</li> </ol> <p>These 9,000 cyclists would obviously require a Boris Blue cycle lane each way entailing unacceptable loss of half of the (already scarce) residents' parking.</p> <ol style="list-style-type: none"> <li>7. Damage to the recovering river ecology</li> </ol> <p>No work has been done on the ecology, nor on the effect on the new Super-Sewer project or refuse-barge handling.</p>	<p>undertaking a new questionnaire survey on Vauxhall and Chelsea bridges and travel surveys of various Nine Elms developments which have recently been completed in order to provide updated information on existing desire lines and travel patterns in the local area. Additional pedestrian and cycle counts will also be undertaken in order to provide a better indication of current pedestrian and cycle demand in the local area</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>8. Health and Safety issues</p> <p>Imagine the cyclists racing downhill from the middle of the bridge, whirling round the bends, scaring those wobbling up hill. The bridge would need three segregated lanes, so as wide as a road bridge. Speed bumps? Dangerous!</p> <p>9. The nightmare construction period</p> <p>Expect 3 years of unnecessary mess, traffic jams, noise, mud, dust and pollution (of air and river) and disruption while they build the beastly thing. Against the wishes of Pimlico Residents and Westminster Council.</p> <p>10. Rotten Boroughs £££:</p> <p>For the sake of our democracy we should avoid potentially unhealthy £ relationships between Wandsworth Councillors and property developers.</p> <p>The above comments refer to the following parts of the plan: See edit request following each para</p>		
	VSM Estates	Freya Turtle	Associate Director Turley Associates	1060	Policy PM3	<p><b>For full context, see the attachment with comment 1058</b></p> <p>Policy - PM3 Nine Elms</p> <p>London Plan conformity - Policy PM3 seeks to deliver at least 6,912 homes in the Nine Elms area. VSM suggests that Policy PM3 should also reference the need to meet the overall housing target for the Vauxhall Nine Elms Battersea Opportunity Area, which is 18,500 (London Plan Table 2.1) over the Local Plan period.</p> <p>VSM agrees with Policy PM3's support for meanwhile uses on development sites, as this is in compliance with London Plan Policy D8.</p> <p>Policy PM3 requires development to make provision to connect to District Heat Networks. VSM considers that text should be added to state that where these existing networks rely on CHP (i.e. at Embassy Gardens), they should be decarbonised by 2050. This would ensure compliance with London Plan Policy SI3 and its supporting paragraph 9.3.3.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - VSM questions whether the Nine Elms Site Allocations (that are contained within the supporting text to Policy PM3), as they relate to NCGM, represent the most appropriate strategy.</p> <p>Of the five Development Zones that make up the development granted by permission ref. 2014/2810, only the Entrance Site is featured as a Site Allocation. Because the Main Market Site and Northern Site are under construction, it is accepted that it is not necessary for these to be subject to new Site Allocations. However, VSM questions why LBW has omitted the Apex Site and the Thessaly Road Site (which are not under construction and do not yet have reserved matters approval). In fact, these two sites are shown on the supporting Key Diagram (p98 of the Local Plan), and their development would take place during the Local Plan housing target period of 2023-2033.</p> <p>It is suggested that the Apex Site is allocated for: "residential and flexible commercial (retail, restaurant, business, leisure) uses, with creation of new east-west pedestrian route connecting Pascal Street to the railway viaduct." It is also suggested that the railway arches immediately adjacent to the Apex site are allocated for "range of commercial uses within Use Class E and appropriate sui generis uses." Building heights approved for the Apex site are 16-26storeys</p>	<p>It is agreed that Policy PM3 should reference the overall housing capacity of the VNEB.</p> <p>Support for meanwhile uses is noted.</p> <p>District Heat Networks - Agreed. The London Plan sets out in para 9.3.3 that existing networks will need to establish decarbonisation plans. These should include the identification of low- and zero-carbon heat sources that may be utilised in the future, in order to be zero-carbon by 2050. Wording to be added to PM3 to reflect this comment.</p> <p>It is agreed that the site allocation should incorporate the Apex Site and the Thessaly Road site, in addition to the already allocated Entrance site. It is agreed that any improvements to road adjoining site NE2 were to be realised, these should not undermine the operational requirements of the market, including relating to access.</p> <p>It is agreed that reference within the Entrance site to the emphasis on providing for local makers and artisans is not something that cannot be controlled by planning policy. This should be removed.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	<p>Policy PM3 amended to include a reference to the overall housing capacity of the VNEB.</p> <p>The New Covent Garden Market Entrance Site Allocation has been expanded to a cluster of the Apex Site, the Thessaly Road Site and the Entrance Site.</p> <p>The Site Allocation will be amended to state that the entrance road to NCGM between the Entrance site and NE2 should be made more pedestrian friendly without undermining the operational requirements of the access road to the Market.</p> <p>Wording to be added to PM3 to reflect comment regarding DHN and where existing networks exist, they must plan to decarbonise by 2050.</p> <p>Reference to 'local makers and artisans' should be removed from the Entrance site allocation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>and it is suggested that this be referenced, albeit that increased heights can be permitted so long as the tests of LBW's tall building policy are met.</p> <p>It is suggested that the Thessaly Road Site is allocated for: "Infill residential development" and that the permitted building heights of 6-storeys are referenced. Again, it should be referenced that increased heights can be permitted should the applicant be able to demonstrate it would be acceptable.</p> <p>The proposed allocation for the Entrance Site (allocation reference NE12) reads: "Residential-led mixed use development with independent shop and business emphasising local makers and artisans. Improved transport capacity, a new permeable network of streets and urban spaces including amenity space. "Whilst the general mix of residential, business and retail uses for the site is accepted, VSM disputes the suggestion that the commercial floorspace should emphasise independent businesses and artisans. The planning system can control only uses, and not the tenants and businesses that occupy those uses. It is important to ensure a greater flexibility in the policy framework so that a development that might not come forward for 5-10 years can be reactive/responsive to market change –particularly given the current state and unknown future of the retail market. Furthermore, the provision for independent businesses and artisans does not relate to permission ref. 2014/2810.</p> <p>The Entrance Site Allocation states that if the neighbouring site on the other side of the road comes forward, then the road in between should be made more pedestrian friendly and the footpath and public space should be widened to create a much more attractive gateway into the Market. VSM suggests that an amendment is made to caveat that these changes cannot undermine the operational requirements of the access road into the Market. For building heights, it should reference the fact that the permitted heights are 6-17 storeys and that increased heights can be permitted should the applicant be able to demonstrate it would be acceptable.</p> <p>VSM supports LBW's decision not to state or fix residential unit numbers or floorspace, or building heights, for the Entrance Site Allocation. It is suggested that the same approach is taken for the suggested Site Allocation for the Apex Site and Thessaly Road Site, in order to allow for flexibility and to respond to changing circumstances.</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - Reference the need to meet the overall housing target for the Vauxhall Nine Elms Battersea Opportunity Area, which is 18,500; include the Apex Site and Thessaly Road Site as Site Allocations and amend the Entrance Site allocation.</p>		
	Western Riverside Waste Authority (WRWA)	Mr Christopher Collett	Carter Jonas LLP	1074	Policy PM3	<p>See attachments on comment 1071 for full context</p> <p><b>Draft Policy PM3 Nine Elms</b></p> <p>Part B of draft policy PM3, Nine Elms, states that the Council will promote the development of Kirtling/ Cringle St Riverside site, which is the preferred landing site for the Nine Elms Pimlico Bridge. Development proposals within this location should maximise the opportunity for the creation of green/open space that the Tideway Tunnel access shaft presents, contribute to the creation of a positive arrival experience for pedestrians and cyclists using the bridge, and improve walking and cycling connectivity in line with the VNEB Cycling Strategy.</p> <p>As noted, whilst WRWA supports the principle of the bridge and the enhanced connectivity that it would provide, the extent of the area proposed for public realm should not impact on or limit the development potential of the safeguarded wharves on the Cringle Dock site and Kirtling Wharf sites. WRWA considers that the future operation of the Tideway Tunnel access shaft does not</p>	<p>WRWA's support for the bridge is noted, however, the wording of PM 3-part B (Placemaking) is considered appropriate.</p> <p>The Opportunity Area Planning Framework for VBNE identifies improving the river walk as a key objective for the public realm strategy. In response to this, the area around the Kirtling/ Cringle St Riverside landing location should encompass the maximum possible green/open space. Furthermore, LP 20 states that major developments, which the proposed bridge certainly qualifies for, will be required to provide new public open space on site. The wording in PM 3 reflects the complimentary nature of the two former policy goals, and makes it clear how they can be achieved by ensuring there is plentiful open/green space around the Tideway Tunnel.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>restrict the land to be used solely for green/open space. There is the potential for the development of the site to incorporate the access shaft within it and therefore, provide a more flexible approach to the placemaking of the area. The draft policy should therefore be revised (as set out below) so that it is less prescriptive and provides the greater flexibility required.</p> <p>The wording of part B of draft policy PM3 should be revised as follows:</p> <p>The Council will promote the development of Kirtling/ Cringle St Riverside site, the preferred landing site for the Nine Elms Pimlico Bridge. Development proposals within this location should maximise the opportunity <del>development</del> potential of the site, including incorporating <del>for the creation of green/open space that</del></p> <p>the Tideway Tunnel access shaft and green/open space presents, contribute to the creation of a positive arrival experience for pedestrians and cyclists using the bridge, and improve walking and cycling connectivity in line with the VNEB Cycling Strategy.</p>		
	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1224	Policy PM3	<p><b>See attachment for full context and associated images</b></p> <p>Policy PM3 Nine Elms</p> <p>Part G of Policy PM3 Nine Elms promotes the development of the BDTQ to support creative, design and technology SMEs in Nine Elms.</p> <p>Schroders is supportive of the approach to BDTQ within the Draft Local Plan, particularly the requirements to provide a mix of uses and scale of development that is consistent with the BDTQ Framework and to deliver intensified development.</p> <p>It proposes that Part G3 should be expanded to include reference to "intensified industrial and office floorspace". This change would make the policy consistent with Section 6.3 'Mix of Uses and Scale of Development' of the BDTQ Framework and with the approach of Part B4c of Draft Policy LP37 Managing Land for Industry and Distribution, which confirms that office accommodation will be appropriate in upper floors within the BDTQ. This change would also make the policy consistent with the 'Battersea Design and Technology Quarter' site allocation, which is allocated for "a mix of workshops and studio uses, office space for SMEs, open space and industrial uses".</p> <p>In addition, in the context of Part G4, please note the comments made further on in this letter relating to Policy LP41 Affordable and Managed Workspace. Schroders supports the approach to providing affordable or managed workspace within the BDTQ, but considers that the level of rental discount in BDTQ should be reduced.</p> <p>The above map(Figure 1), illustrating the BDTQ, can be found on page 99 of the Draft Local Plan under Policy PM3 Nine Elms. Schroders proposes the following changes in order to accurately reflect the current situation and future vision of the BDTQ. These are as follows:</p> <ul style="list-style-type: none"> <li>The map shows an 'existing route' running through the Battersea Studios Site (within Site Allocation NE8).It is not currently possible to pass through the site to Stewarts Lane, so Schroders proposes that the route is notated as a <b>"Suggested / proposed new pedestrian route"</b>;</li> <li>It is inappropriate to notate the potential space within Battersea Studios as a "Proposed new public linear park". Instead, it should be identified as a <b>"Green/amenity space"</b>, consistent with the BDTQ Framework; and</li> </ul>	<p>Support for the BDTQ is noted.</p> <p>This policy is already consistent with section 6.3 of the BDTQ framework and LP37, as intensifying industrial uses does not preclude office development from the upper floors, and the intensification of industrial floorspace is a requirement of development (e.g. an industrial only scheme would be appropriate). LP37 4bc notes how SME office development is allowed on the condition that it would result in an intensification of industrial uses. There is no need to widen PM G3 to achieve consistency. The council acknowledges the application for planning permission for Battersea Studios in NE 8, but policy is designed on a holistic basis.</p> <p>LP41 already splits the borough into three zones, with only the VNEB OA having the 50% reduction requirement. LP41 notes that this is subject to viability and so can be discussed through the application for PP. There is no need to amend the policy.</p> <p>Agree with amendments to the BDTQ map. The language used for suggested building frontages is considered appropriate and consistent with the rest of the Local Plan.</p>	<p>Spatial Area Map (Battersea Design and Technology Quarter) has been amended to show the route within the Battersea Studio area of NE8 as a suggested/ proposed new pedestrian route.</p> <p>Legend has been amended to identify green space, instead of "proposed new public Linear Park"</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Schroders suggests amending "Suggested building frontage" to "Indicative building footprint" in order to provide a reflection of the potential built form on sites within the BDTQ, in line with the vision set out in the BDTQ Framework.		
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1294	Policy PM3	<p><b>See attachment for full representation and context</b></p> <p><b>PM3 - Nine Elms Area Strategy</b></p> <p>We support the overall objective of promoting the Nine Elms Area for redevelopment. Ballymore has been a key supporter for the area and a driver for change through the Embassy Gardens Development and associated US Embassy.</p> <p>We are pleased to see that the Council is seeking to deliver joined up development and public realm through the Nine Elms Masterplan and the active role officers are taking through its delivery. A design led approach to the area is key not only to justify the density and quantum of development being proposed but also to provide high quality living spaces for future residents.</p> <p>The identification that retail development will be appropriate to support the day-to-day needs of residents and workers is supported. While we appreciate the development should not negatively affect the viability of development within the CAZ retail clusters, we have concerns that the limited quantum's proposed could result in barren and unattractive ground floor spaces which do not promote the vision of the masterplan or provide activity on key routes.</p> <p>The draft Local Plan states that cafes, restaurants, pubs or drinking establishments, and take-away facilities that serve the needs of residents, workers and visitors will generally be acceptable, particularly where located within the focal points of activity. However, the policy gives no guidance on larger convenience retail uses, notably such as the Waitrose store within Embassy Gardens.</p> <p>We strongly consider that the policy should introduce additional flexibility to enable larger retail facilities that meet the needs of local people while respecting the overall objective of intensifying Vauxhall and Battersea power station.</p> <p>Ballymore is also a keen supporter of the new Linear Park that will be at the heart of the area, surrounded by the development plots of Nine Elms Parkside, Nine Elms Square and Embassy Gardens. We support the approach to resist proposals to reduce the size of the park or undermine its quality.</p> <p>The park is a key landmark within the wider area, and we support its ability to justify buildings of a taller nature especially those that create placemaking opportunities and provide additional public realm to increase and enhance the quality of the park.</p> <p>Ballymore is also a keen supporter of meanwhile uses and strongly supports their introduction on development sites, to mitigate the impact of construction and boost the area in the interim period.</p> <p>Whilst we appreciate that the uses should enhance the vitality and vibrancy of the area and should seek to promote arts and cultural uses for the benefit of local communities; other uses should not be dismissed purely because they do not fit this vision. Given the challenging economic circumstances and current weakening demand for commercial floorspace, any uses that create activity and improve community safety should be strongly considered.</p>	<p>The approach of PM3 Smart Growth Parts D &amp; E is based on the VNEB OAPF, which specifies that – in addition to the promotion of the two CAZ retail clusters (referred to as CAZ frontages) – “small scale retail use could play a supporting role as part of residential-led mixed use development, but should perform a local function and not lead to the creation of a continuous retail theme throughout the opportunity area or become a destination in its own right”. The text further clarifies that such sites should be identified according to the sequential approach to site selection.</p> <p>Please note that further changes have been made to this policy in response to comments from LB Lambeth (comment # 1591), which clarify - in accordance with the above - that the application of a sequential test for units above a certain size (280 sqm net / 400 sqm gross) in locations outside the CAZ retail clusters. This takes forward (and slightly amends) the adopted policy approach. The indicative boundary for the Vauxhall CAZ retail cluster has also been removed from the policy wording and the associated mapping, reflecting the designation of this boundary within the adopted LB Lambeth Local Plan. The Council consider this approach allows sufficient flexibility for the correct level of retail / leisure uses to come forward, whilst ensuring that barren and/or unattractive frontages will not proliferate, and that it is generally consistent with and reflective of existing/proposed uses. Key routes would be expected to incorporate active ground floor uses, in keeping with the masterplan. Larger retail facilities located outside of the CAZ retail cluster at Battersea Power Station (and at Vauxhall Cross in Lambeth) would be expected to pass the sequential test, and would only be permitted in those instances.</p> <p>Support for the approach to the new Linear Park and meanwhile uses is noted. Meanwhile uses would be expected to comply with policy LP 48 (Meanwhile Uses), and could encompass a wider variety of uses than those included in PM3. It is agreed that the policy should be revised to state that where meanwhile uses incorporate arts and culture, these should then conform with the Arts and Cultural Strategy for Battersea and Nine Elms and the Borough's Arts and Cultural Strategy 2021-31.</p>	<p>Amend PM3 to specify that where meanwhile uses incorporate arts and culture, they should accord with the Arts and Cultural Strategy for Battersea and Nine Elms and the Borough's Arts and Cultural Strategy 2021-31.</p> <p>Please also see changes proposed in response to comment # 1591 (LB Lambeth), with respect to development proposals in and outside of the potential CAZ retail clusters.</p>
Mr Malcolm Souch	Project Director NHS London Healthy Urban			1518	Policy PM3	PM3 Nine Elms 'Smart Growth' clause A refers to the expected provision of 6,855 homes over ten years to 2032/33. This figure doesn't tally with the table under Policy LP24. According to the Authority Monitoring Report 2019/20, there were 10,383 new homes completed or under	The council has worked with HUDU to identify health care provision in the borough and note the capacity enhancements in Lambeth.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Development Unit (HUDU)					4construction as of 31 March 2020. Therefore, it would appear that over half of homes planned for the Opportunity Area have already been completed. The 'People First' Clause B refers to the provision of a new health centre at Sleaford Street which is required to meet the substantial growth in demand from housing growth in the area. The CCG and NHS partners will continue to work with the Council to deliver the new health centre. It is expected that the health centre will be operational by the end of 2023.We also note the reference in Clause B to further healthcare provision at Nine Elms Square. The CCG will work with the Council to review the healthcare needs and opportunity for space at Nine Elms Square. It should be noted that the Opportunity Area extends into Lambeth and there are also plans to improve three existing premises which will provide additional capacity. Therefore, any further healthcare provision in the Wandsworth part of Nine Elms should take into account these capacity enhancements. We note the planned improvements to walking and cycling, particularly the new linear park and public transport in the area will improve physical access to healthcare services in the area		
Michael Atkins	Senior Planning Officer  Port of London Authority			1450	Policy PM3	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>4. Area Strategy for Nine Elms</p> <p>Welcomed that paragraph 5.8 of context section states that the area will continue to accommodate several key industrial sites including the Safeguarded Wharves located at Cringle Dock, Kirtling Wharf and Middle Wharf, however it is disappointing that associated policy PM3 (Nine Elms) does not also specifically support the continued safeguarding of this sites and requires amendment to include these in the policy.</p> <p>- Policy PM3: Nine Elms.</p> <p>Within policy PM3 it is stated that the Council will promote the development of Kirtling/Cringle St Riverside site which is the preferred landing site for the Nine Elms Pimlico Bridge. In addition, the Nine Elms development map (Page 96) and Kirtling Street Cluster Map (page 97) highlights this area which appears to include the north east corner of the safeguarded Kirtling Wharf, and also appears to highlight the safeguarded wharf as a suggested area of new public open space and for public realm improvements. The PLA would strongly object to the proposed change in designation here, the wharf is safeguarded for waterborne freight cargo handling and the PLA would object to all or part of the site being lost for alternative uses. In addition, with regard to the proposed pedestrian and cycle crossing, as the owner of the riverbed and given its role as the statutory harbour authority for the River Thames the PLA would be unlikely to support a crossing located in an area that could negatively affect the long term viability of one of the boroughs key safeguarded wharves and would welcome further discussion on this matter. Paragraph 5.8 states that the area will continue to accommodate several key industrial sites, including the safeguarded wharves at Cringle Dock, Kirtling Wharf and Middle Wharf. This must be made clear in the policy wording as well. Furthermore to note the PLA is aware of substantial interest from operators within, and new to, the Port of London for handling bulk cargo, including aggregates and considers that over the next 15 years employment will continue to grow in this sector in Wandsworth through the ongoing use and reactivation of its safeguarded wharves and this should be supported in the Local Plan.</p> <p>Part D of the 'people first' section of the policy states that the continuity of the Thames Path along the riverside is key to enhancing active travel in the area and ease of movement, recognising that this will need to be achieved in a manner that protects the safeguarded wharves. In principle this is supported and is in line with the PLAs Thames Vision, which includes the aim to join up the Thames Path from source to sea but notes that there are particular challenges in finding the best route near operational wharves and terminals</p> <p>In principle support Part L of the 'smart growth' section of the policy which refers to riverside wharves as being a potentially suitable location for urban logistics hubs for last mile deliveries which can help reduce congestion and pollution.</p>	Support for the Nine Elms Pimlico Bridge and urban logistics hubs is noted. The Port of London Authority's concern around the safeguarded wharfs is noted. LP 43 has more detail on how the local plan will protect wharfs by ensuring mixed use developments near wharfs must retain or improve the wharfs functionality. The Agent of Change principle as set out in Policy D13 of the London Plan will also apply to any development near Kirtling Wharf. However, as the Port of London Authority has noted, this support for Kirtling Wharf could be incorporated into the policy to make it clear that this site will continue to be used for industrial purposes.	Amend PM 3 B (Placemaking): Development proposals within this location should maximise the opportunity for the creation of green/open space that the Tideway Tunnel access shaft presents, contribute to the creation of a positive arrival experience for pedestrians and cyclists using the bridge, and improve walking and cycling connectivity in line with the VNEB Cycling Strategy, <u>while also retaining Kirtling Wharf as a safeguarded zone for waterborne freight handling in line with LP 43.</u>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Safestore	Matthew Lloyd Ruck	Planner Savills	1383	Policy PM3	<p><b>See attached to comment 1382 the full representation for context</b></p> <p><b>Area Strategy for Nine Elms - Battersea Design and Technology Quarter Masterplan and Site Allocation NE7 – Ingate Place</b></p> <p>The 2019 BDTQM document, compiled by 'We Made That' (WMT), has had a significant role in the spatial policy designation Ingate Place. Policy seeks to use the BDTQM as the basis of an emerging SPD document, referenced within draft policy LP37.</p> <p>However, to date there has been no formal public consultation process inviting landowners to provide comments on this document. Any SPD would need a statutory 4-6 weeks of public consultation and due alterations before adoption. Therefore, significant weight cannot be placed upon the BDTQM in the local plan before this process has been undertaken. The draft local plan should not go through public consultation while incorporating the spatial-based policy of the BDTQM, that is yet to go through the necessary adoption processes. The weight given to the BDTQM within the draft local plan without the necessary due consultation is therefore unsound.</p> <p>Policy LP37 outlines that Ingate Place remains allocated as SIL. Within SIL, development is limited to industrial and related capacity uses, including general and light industrial uses, logistics, waste management and environmental industries (such as renewable energy generation), utilities, wholesale markets and some transport functions. The implications of Ingate Place's SIL designation is expanded on in more detail on page 107, where the area's site allocation is discussed.</p> <p>Paragraph 18.3.4 of the draft Wandsworth Plan outlines that Strategic Industrial Land (SIL) is defined within the emerging London Plan as 'forming London's main reservoir of land for industrial, logistics and related uses, and is given strategic protection because these sites are considered critical to the effective function of London's economy'. However, paragraph 18.3.4 of the Wandsworth Plan fails to consider the paragraphs 6.5.1 and 6.5.2 of the London Plan, which outline that SILs 'can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development [...] providing relatively low-cost industrial space for SMEs and located close to the strategic road network.'</p> <p>Therefore, the London Plan's definition of SIL attributes four main characteristics to them:</p> <ol style="list-style-type: none"> <li>1. Critical to the effective function of London's economy.</li> <li>2. Accommodate activities which have the potential to raise tensions with other land uses.</li> <li>3. Providing relatively low-cost industrial space; and</li> <li>4. Located close to the strategic road network.</li> </ol> <p>Safestore strongly object to the characterisation of Ingate Place as an area suited as SIL when considered in context of the above characteristics.</p> <p>Firstly, the site only contributes 4.8% (2ha) of the total 41ha Queenstown Road SIL designation and is not a contributor towards the effectiveness of London's economy. The Site is isolated, being surrounded by railway lines, physically separated from the surrounding SIL, making the area distinct from the surrounding reservoir of industrial use. Safestore Ingate Place primarily serves a number of local business and domestic functions only. In its current context, the area is not critical to the effectiveness of London's economy.</p> <p>In relation to the second SIL characteristic, the existing activities on site do not raise any potential amenity impacts onto other land uses. Paragraph 18.39 of the draft Local Plan outlines that the 'nature and by-products of industrial activities, which include the generation of noise, odours, dust, emissions, traffic (including HGVs) and the requirement for operation across a 24 hour period,</p>	<p>The Battersea Design and Technology Quarter Economic Appraisal and Development Framework was commissioned to assist the Council to understand how such a concept could be defined, mobilised and delivered in the area. The document has been endorsed by the Council, and it is considered appropriate that this evidence should therefore inform the Council's spatial policy. It is noted that a consultation exercise, led by We Made That (authors of the study) and assisted by Council officers, was undertaken to inform that document, in which a number of landowners participated - however, against the wishes of both the Council and Safestore, the latter were not involved. The Council have subsequently engaged with Safestore on this matter, and particularly given the above, would welcome further discussion to identify an appropriate strategy for this site in Ingate Place which is agreeable to both parties.</p> <p>As the representation identifies, the document is not an SPD, and has not been subject to any of the formal consultation processes associated with the making of SPDs. The approach it has informed (in particular within the Site Allocation) in the Local Plan is subject to both this and subsequent consultation, affording opportunity for comment. To this end, the Council agree with the representation that references to the BDTQ Study within the BDTQ Site Allocation Cluster place too much emphasis on this (non-statutory) document, and - although it is appropriate to refer to the study - developers should be instructed to 'have regard' to the study, rather than to adhere to it.</p> <p>The designation of a limited area of the SIL as the BDTQ reflects the Council's ambitions for the area, and - as identified in paragraph 18.42 of the Regulation 18 Local Plan - builds on the approach established within both the previous Local Plan and previous London Plan, which recognised the location as an Industrial Business Park (as is also noted in the representation). The IBP designation was recognised within the previous London Plan as a 'type of SIL', and the current London Plan takes forward that latter designation. Through the BDTQ designation, however, the Council have set out a local policy for this area within which mixed-use development, including offices, are permitted; differing from the approach to other areas of SIL land within the borough and as set out within the London Plan - and which reflects many of the comments raised within this representation. As set out within paragraph 18.43 of the Reg 18 Local Plan, the Council intend for any redevelopment to protect and enhance the industrial character of the area - and indeed to intensify the provision of industrial capacity, where appropriate. This is necessary in order to meet the Council's identified need. As such, the Council have no desire to de-designate any of the Queenstown Road, Battersea SIL, which could undermine these ambitions. This approach is not considered likely to stifle investment - indeed, reaction from the majority of landowners in the area has been very positive - and it is therefore not considered to be unsound as suggested within this representation.</p>	Amend PM3 Placemaking A, Smart Growth G and the BDTQ site allocation to states that development should 'have regard' (or equivalent) to the Battersea Design and Technology Quarter.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>can often result in conflicts being raised with other uses'. Safestore, Ingate Place does not portray these aforementioned characteristics. The site is principally used for self-storage purposes with an element of office and workshop space within the business centre, with no intense industrial operations on-site. There are already 6 examples of Safestore sites successfully colocated with other land uses within London, without any detrimental impact upon neighbouring land-uses. Ingate Place is therefore not an area that produces by-products of industrial activities, making it an appropriate area for a larger variety of land uses than just industrial.</p> <p>The distinctness of Ingate Place from the wider SIL is reinforced by the fact the area was designated as an Industrial Business Park (IBP) and not a Preferred Industrial Location (PIL). The site was designated as an IBP as the land uses on site were demonstrably different from the more industrial PIL land uses. The New London Plan does not currently recognise IBP within its SIL designation and therefore at a regional level, the site will be allocated as SIL without distinction. However, there is currently a significant amount of office use within Ingate Place that would not currently be supported as being suitable within a SIL in policy terms. Considering the quantum of office use that exists within Ingate Place, the area does not function as an area designated as SIL and should not be designated as such.</p> <p>In regard to the third characteristic, paragraphs 6.5.2 of the Publication London Plan (2020) outlines that SILs should provide low-cost industrial floorspace for SMEs. The site is currently occupied by high value uses and not fit to be part of the wider Queenstown SIL designation. Due to the high value uses, the site will only be commercially viable by incorporating a variety of land-uses which contribute to the wider function of the BDTQM. Therefore, it's clear that designating the site as SIL could act as a deterrent to any redevelopment opportunities on site, which is principally against the overarching objectives of the wider BDTQM and Battersea and Nine Elms Opportunity Area.</p> <p>Lastly, paragraph 6.5.2 of the New London Plan outlines that SILs should be well-located 'close to the strategic road network'. The Site is extremely isolated, being surrounded by railway lines, physically separated from the surrounding SIL. It also lies over a mile away from the strategic road network of the A3. The isolated nature of the site means it is not able to significantly contribute to the surrounding parcel of SIL. The removal of Ingate Place from SIL would therefore enable the site to make a greater contribution to the LBW.</p> <p>The NPPF requires that, for a local plan to be declared sound, it must be effective, meaning it must be deliverable. The allocation of the site as SIL means that the context of the site is misunderstood, and it should be recognised that the likelihood of the Council achieving SIL uses on this site is extremely unlikely. As such, the plan as drafted is effectively stifling the opportunity for investment in the site ensuring that the status quo will remain for the entire plan period.</p>		
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1368	Policy PM3	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p>Policy PM3 Nine Elms</p> <p>Policy SI 8 (Waste capacity and net waste self-sufficiency) of the Publication London Plan seeks to manage London's waste sustainably. It states that development plans should plan for identified waste needs and identify waste management facilities to provide the capacity to manage the apportioned tonnage of waste identified in the London Plan, in the case of Wandsworth this is 3.2% of London's total waste. The Publication London Plan indicates that borough level apportionments of household, commercial and industrial waste for Wandsworth will rise from 264 to 280 (000 tonnes) from 2021-2041.</p> <p>In consideration of the above and future rising borough apportionment we note Policy PM3 makes no reference to waste or wharf uses despite smart growth part g mentioning the protection of industrial land. On this basis we consider Policy PM3 must recognise the potential growth of Cringle</p>	Policy LP13 safeguards the Cringle Dock site for waste uses and it is not considered necessary to repeat this in Policy PM3. The Site Allocation also states the retention or enhancement of the wharf capacity and operability, acknowledging that Development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Dock and Kirtling Wharf to meet future waste apportionment figures as designated under the publication London Plan.</p> <p>We note part B of Placemaking references the preferred landing site for the Nine Elms Pimlico Bridge adjacent to Kirtling Wharf and Cringle Dock and the aspiration for development proposals within this location to maximise the opportunity for green / open space. We request that LB Wandsworth recognise the industrial ownership and character of Nine Elms in their consideration of the level and capacity of green / open space the surrounding area can accommodate.</p> <p>Furthermore, and in view of London Plan Policy D13 (Agent of Change) we recommend Policy PM3 state that any future development mitigate impacts from the existing noise generating waste sites to ensure their future viability and potential intensification is not compromised. Development proposals for the site allocation must manage noise in accordance with the criteria set out in Section D of London Plan Policy D13.</p> <p>Cringle Dock plays a critical part in meeting waste apportionment targets for the borough of Wandsworth and this must be recognised in the development context of Nine Elms and Policy PM3.</p>		
Robert East	Senior Planning Policy Officer LB Lambeth			1591	Policy PM3	<p>PM3 Nine Elms Smart Growth</p> <ol style="list-style-type: none"> <li>Outside of the Battersea Power Station and Vauxhall CAZ retail clusters, limited retail development will be appropriate to support the day to day needs of residents and workers. Such development should be of a small scale and must not negatively impact on the viability of development within the CAZ retail clusters.</li> </ol> <p>Lambeth have some concerns with this part of the policy as it is currently written particularly regarding how it is going to be tested and implemented. How will Wandsworth ensure that there is not a dilution of retail within the Vauxhall CRC? This policy needs to have greater clarity, and needs to set out:</p> <ul style="list-style-type: none"> <li>What is meant by the term 'limited retail development'?</li> <li>How will 'appropriate' be tested?</li> <li>How will small scale be measured?</li> <li>What is meant by 'negative impact on the viability of development'.</li> </ul> <p>The vitality of the CAZ retail clusters should also be taken into account not just their viability.</p> <ol style="list-style-type: none"> <li>Proposals for cafes, restaurants, pubs or drinking establishments, and take-away facilities which serve the needs of residents, workers and visitors will generally be acceptable, particularly where located within the focal points of activity, and where these support the 'twilight' economy, subject to the impact on adjacent uses. In order to mitigate this, conditions may be used to control the hours of operation.</li> </ol> <p>Wandsworth should ensure that town centre uses, even at small scale, outside of the defined town centre hierarchy do not detrimentally impact on retail provision in neighbouring boroughs' designated town centres and CAZ retail clusters. Policies should ensure town centre uses are only considered in out of centre locations if a sequential test, and if necessary, an impact assessment, have been undertaken in line with national policy, taking account of town centres across borough boundaries. Lambeth would like to be consulted on any such schemes in Wandsworth that are in close proximity to the borough boundary. Such development should be of a small scale and must not negatively impact on the viability and vitality of development within town centres and CAZ retail clusters. Please see also Lambeth's comments relating to part D.</p>	<p>Comments noted. Smart Growth Parts D &amp; E is based on the approach set out within the VNEB OAPF, which specifies that – in addition to the promotion of the two CAZ retail clusters (referred to as CAZ frontages) – “small scale retail use could play a supporting role as part of residential-led mixed use development, but should perform a local function and not lead to the creation of a continuous retail theme throughout the opportunity area or become a destination in its own right”. The text further clarifies that such sites should be identified according to the sequential approach to site selection.</p> <p>In turn, such uses were therefore incorporated within the Area Strategy for Nine Elms in the Council's Site Specific Allocations Document (part of the adopted Local Plan) and were included, where applicable, as part of site allocations. This specified that retail uses that were above 300 sqm (net) were subject to the sequential test, where applicable.</p> <p>Such a requirement was not initially carried forward in order to afford greater flexibility to Development Management officers to make the assessment on a case by case basis, however, in response to LB Lambeth's concerns, it is considered helpful to add clarity to when the sequential test should apply. Rather than taking forward the 300 sqm value, this should instead be revised to 280 sqm (net) / 400 sqm (gross), which is consistent with the Sunday trading threshold, and is the borough's locally-set threshold for the submission of an impact assessment for retail and leisure uses (when exceeded).</p> <p>Following the adoption of the LB Lambeth Local Plan, which outlines a boundary for the Vauxhall CAZ Retail Cluster (identified as Vauxhall Cross), and reflecting the type of development that is coming forward, LB Wandsworth do not consider it is necessary to identify the 'Vauxhall CAZ Retail Cluster' as being located within the boundary of Wandsworth. The above approach should therefore apply to all areas of Wandsworth that are located outside of the CAZ Retail Cluster at Battersea Power Station.</p> <p>It is agreed that the vitality of the CAZ retail clusters (and other centres) should be taken into account as well as their viability.</p>	<p>Amend PM 3 Nine Elms, Smart Growth Parts D and E to read as a single clause, which should clarify that outside of the CAZ retail cluster: only limited retail development will be allowed for the day to day needs of residents, and that leisure and other town centres uses should perform a local function. New text should be added stating that units over 400 sqm (gross) will be subject to sequential testing.</p> <p>Amend PM 3 Nine Elms, Smart Growth Part C to remove the reference to the CAZ retail cluster at Vauxhall, with corresponding changes to the Nine Elms Area Strategy maps.</p> <p>Corresponding amendments should also be made to LP 46 (Out of Centre Development), and the supporting text, which currently only references the VNEB OAPF.</p> <p>The removal of reference to 'Focal Points of Activity' from the amended PM3 Smart Growth Part E should also necessitate the deletion of the two 'Focal Points of Activity' within the VNEB OA, as these are now redundant designations. LP 59 (Riverside Uses, Including River-dependent, River-related and River-adjacent Uses), and the supporting text, should be amended accordingly.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>1. To support the important economic function of the Stewart's Road Industrial Estate, the Council will support proposals which enhance and/or intensify the industrial provision, including through improving, whether directly or through the provision of funding, the condition of the road within the industrial area, the condition of Stewart's Road bridge, and the proposed walking/cycling underpass to connect the area to the power station.</p> <p>Lambeth is supportive of this but would like to highlight what is stated the SCG between the two parties: Wandsworth agrees that, in order to mitigate impact of traffic associated with the redevelopment Pensbury Place waste transfer station, it will ensure cross-border consultation on all proposals to intensify the waste uses particularly in regard to transport impacts.</p>		
	The Arch Company	Alex Christopher	Director Turley Associates	1556	Policy PM3	<p><b>See attachment for full context and graphics</b></p> <p>Draft Policy PM3 (Nine Elms), Site Allocation NE8 (Silverthorne Road)&amp; Draft Policy LP37 (Managing Land for Industry and Distribution)</p> <p>Chapter 5 of the Draft Local Plan sets out the Council's ambition and spatial approach for the wider Nine Elms area in general and the BDTQ (including the above site allocation) in particular. Overall, The Arch Company supports the general direction for the area, as set out in Draft Policy PM3, which seeks to create a framework for new development in the area contributing to the delivery of intensified business/employment space (including new jobs being provided in the form of modern office and workspace uses alongside 'traditional industrial' uses, although it is important to remind the Council that the baseline position in terms of identified need and demand within the BDTQ may be subject to change due to the impacts of the COVID-19 pandemic, and therefore an updated evidence base to confirm the continued market interest/demand for those type of uses and/or adding a layer of flexibility that alternative employment-generating uses may be acceptable depending on identified needs at the time are strongly recommended)—and has the potential to become a key driver in our economic recovery. These objectives are similarly key to our client's ambitions who, through the development potential of their portfolio, can significantly contribute to achieving these and others, i.e. the delivery of a mix of uses alongside employment floorspace, over the plan period.</p>	Support for the general direction of the Area Strategy noted. The Council is cognisant that the Coronavirus pandemic, and associated restrictions, has the potential to shift the baseline position regarding identified need, and is committed to reviewing its evidence base as part of the ongoing review of the Local Plan, as well as once a greater body of data is available. It is noted that the Local Plan does set out criteria for the redevelopment of office and industrial uses (other than in the strategic reservoir) to other uses in instances where it can be sufficiently demonstrated that there is no demand for the current use (see LP36.E.2 and LP37.D.3).	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1631	Policy PM3	<p>See attachments on 1615 for more detail</p> <p>PM3 Nine Elms</p> <p>Biodiversity Net Gain is not specifically mentioned, and should be an overall objective. Development should include offsite provision within existing or new green spaces if not available within the development footprint.</p>	Comment noted. LP57 Biodiversity has a requirement for all projects to produce a biodiversity net gain.	No change to the Local Plan required as a result of this representation.

## Chapter 6 - Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Chris Brodie				447	6.1	Clapham Junction It might be premature for a fully worked up masterplan (para 6.1), but some key movements should be put in place now, anticipating these future developments. To include Crossrail 2 on maps 2.1 and 2.2 (the key diagram) and then not to explore implications even at a very high level is inconsistent. The site allocations should then be viewed against masterplan principles. A basic masterplan should explore movement within the station and to and from it as well as implications of plans for Crossrail 2 and an extension of the Northern Line. Is building above the railway tracks definitely off the agenda for the period of the plan? If not, it should be explored in a masterplan. The site allocations make reference to the railway bridge over Falcon Road and the desirability of improving its impact. The condition of Falcon Road under the bridge is certainly not a new problem, but with a prospect of development coming forward in and around the station it needs to be fully addressed. A feasibility scheme for its improvement needs to be drawn up and costed with those costs covered by development in the vicinity and factored in their viability. If major changes to transport infrastructure are not to occur in the plan period, perhaps ambitions for development around the station should be scaled back and limited to schemes that assist with passenger movement and pedestrian/cycle/taxi/ bus interchange.	The Council will lead preparation of a masterplan for Clapham Junction station and adjacent Site Allocations which considers opportunities within the plan period and longer term with implementation of Crossrail 2. The Local Plan will be updated to reflect this	Area Strategy and wording of Policy PM4 and Site Allocations CJ1, CJ2, CJ3, and CJ4 updated
Monica Tross	Sectary to planning committee  Battersea Society			761	6.1	Retail Needs Assessment and Urban Design Study  We are surprised there is no mention of the Retail Needs Assessment (RNA) prepared for the Council by Lichfield's in the first half of 2020 or of the strategic priorities for Clapham Junction it sets out. The Area Strategy is in this sense, therefore, framed differently from the strategies for other town centres such as Putney and Tooting. The RNA notes that vacancy rates tend to be lower, and rents higher, in the core of Clapham Junction, than in the borough's other town centres. But it is far from optimistic about the future over the next 10-15 years. Even before the full effects of the pandemic are taken into account, it projects combined losses of revenue and of floor space for convenience and comparison retail, and for food and beverage uses, far higher than for any other of the borough's town centres; the losses account, indeed, for nearly half the total for the borough by 2030.  Similarly, we find it odd that there is no reference to the area design guidance for Clapham Junction presented in the Urban Design Study commissioned by the Council. The recommendations, for example, to "create new destinations to enhance the visitor experience inspired by its past e.g. theatre/music venue/concept stores/design shops/galleries", and to "reintegrate the Falcon Lane area to the town centre" are entirely ignored.	The Retail Needs Assessments has informed all of the Area Strategies, as well as the more general retail and town centre policies within the Local Plan. The strategic priorities set out within paragraph 8.29 are all incorporated, whether directly or indirectly, within Policy PM4. In particular, the strategy outlines a spatially-specific approach to new retail development between the area's core and more peripheral locations, such as Northcote Road, Battersea Rise, and Lavender Hill. It is recognised that Clapham Junction is likely to experience significant oversupply (and therefore potential loss) of retail and food and beverage floorspace over the course of the Local Plan, however the RNA predicts long-term growth. The Local Plan therefore seeks to enable flexibility between uses (to some extent reflecting the changes to the Use Class Order through the introduction of Class E), however continues to protect capacity such that long-term growth will not be hindered.  The recommendations set out in the Urban Design Study have been incorporated into the Plan where possible. For instance, the aspiration to reintegrate the Falcon Lane area into the town centre are reflected in the relevant Site Allocation. The Area Strategy seeks to strengthen Clapham Junction's role as a major centre and Policy PM4 supports proposals which protect and enhance existing retail provision.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Will Lingard				435	6.1	<p>We have made on-line comments to the specific policies and where appropriate suggested alternative wording. Hopefully this letter provides you with some context to those comments. Nightingale Hammerson is an independent charity which has been serving the Jewish community for over 175 years. They provide residential, nursing, respite, dementia and end-of-life care at their two homes, Nightingale House in Clapham and Hammerson House (which has recently undergone a major redevelopment) in Hampstead Garden Suburb. When the new Hammerson House service opens to residents in May 2021, they will be able to provide life-enhancing care to more than 300 residents across their two sites. Whilst just over half of their residents are self-funding, for the remainder, the charity must annually raise £2.5m or around £600 per resident per week to cover the full costs of their care, over and above the fees they receive from local authorities, NHS and families. Aside from traditional fundraising activities, they have sought to use their real estate assets to enable them to provide care to the elderly who otherwise need to access this through the conventional state system. Having undertaken the redevelopment of their Hampstead Garden Suburbs site, they now wish to do similar at their Clapham site. They anticipate that in order to facilitate a viable redevelopment and improve their current facilities that the relevant draft policies need to contain sufficient flexibility to facilitate such approaches. They also anticipate the need for enabling conventional residential development within their grounds or alternative solutions. They appreciate the ambitions of the Council's policies around specialist housing but wish to ensure that site circumstances and viability are fully recognised in the emerging policies. Furthermore, at the time of the Call for Sites consultation, the charity was not in a position to confirm the availability of their land at Nightingale House (105 Nightingale Ln, London SW12 8NB). Their position has now changed, and we would wish for the site to be identified as suitable for development and work with the council to find a viable solution that secures its long-term future.</p>	The site was assessed in the Site Allocation Methodology Paper and it was concluded that the site does not need to be allocated.	No change to the Local Plan required as a result of this representation.
Councillor Peter Dawson				948	6.1	<p>This is a response to the Local Plan consultation currently underway and relates specifically to the Area Strategy for Clapham Junction and York Road / Winstanley Regeneration Area (Section 6). As drafted, I have 2 major concerns.</p> <p>First - the focus of the strategy is on the station and areas to the north as embodied in the title of the section and the designation as an Opportunity Area in the emerging London Plan. The area strategy leaflet refers to the Clapham Junction Transport Interchange as the "Anchor for Change". This focus means that the residential areas to the south, west and east of the station risk being relegated to a secondary status in terms of overall Area priorities, including for example funding streams for public realm improvements. Therefore, can the importance of improving and sustaining these significant residential areas be given greater prominence so that it is on an equal par both with Clapham Junction Station and the York Road / Winstanley regeneration area? For example, by inclusion of an additional point in the Vision statement.</p> <p>Second - as drafted the Area Strategy gives a green light to the redevelopment of Clapham Junction Station as the "anchor for change". Potentially this could provide for an overdevelopment of the station site as was proposed more than a decade ago with the 2 tower blocks. Overdevelopment of this site would be to the detriment of the residential and retail / commercial areas to the south, west and east of the station as well as possibly areas to the north. My concerns in part are based on changes to previous plans that allowed the current Peabody redevelopment to incorporate taller blocks than envisaged initially. Though the strategy refers to the character of the area as being derived from its Victorian and Edwardian townscapes this could be put at risk in the future by the massing and overdevelopment of the station site. Can this risk be addressed explicitly in the strategy?</p> <p>Overall, the aim of "developing a 21st century urban heart focussed on an improved transport interchange at and around Clapham Junction" dominates the strategy at the expense of surrounding residential communities particularly to the south, west and east. Areas to the north are covered in the context of the regeneration programme and the possible Opportunity Area designation.</p> <p>A final, unrelated point, is that, notwithstanding the commentary at paragraph 2.7 of the Policy Map Changes document, I do not support the proposal to remove the designation of Northcote Road as an Area of Special Shopping Character (Policy DMTS 10) and would request it is reinstated.</p>	Please see the Council's response to comment 674.	Vision and Policy PM4 amended to include improvements to public realm and requirement for new development to respect and enhance character of residential areas outside boundary of Opportunity Area .

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Roz Lloyd-Williams	Executive BID Director The Junction BID			843	6.1	<p>'Pre-Publication' Draft Local Plan</p> <p>The Clapham Junction Business Improvement District (BID) Ltd exists to provide services to sustain and enhance the environment for businesses and the community in the Clapham Junction area. Like our sister BIDs in Putney and Wandsworth, we would welcome the opportunity to work with the Council to help fulfil the aspirations set out in the Plan, and to make the improvements that are so desperately needed in the town centre. We trust that our role will be properly recognised in the next version of the Plan.</p> <p>The new Local Plan comes at a critical time for businesses as they seek to recover from the Covid-19 crisis, and to respond to the changes in consumers' and visitors' behaviour that have been accelerated by the pandemic. In our area, these difficulties are exacerbated by the likelihood that any major re-development of Clapham Junction station will be deferred for many years. This deferment risks casting a blight on any significant developments in the core of the town centre, at a time when an entirely new town centre is about to be opened only a short distance away at Battersea Power Station.</p> <p>Yet further threats arise from recent changes in Government policy, including the creation of the new Class E to cover the great majority of commercial and community uses, thus restricting the Council's ability to manage changes of use; restrictions on the use of Article 4 directions to protect specific uses; and the proposed extension of permitted development rights to allow any commercial property, anywhere, to be converted to residential use. In these circumstances, the Council's strategy must include realistic suggestions for the lifetime of this plan to ensure that Clapham Junction is sustained as a successful centre, and that it responds effectively to change.</p> <p>With regard to the Clapham Junction town centre in particular, we would welcome opportunities to work with the Council and other stakeholders in business and the community to consider and explore how:</p> <ul style="list-style-type: none"> <li>To meet the Plan's aspirations to "protect and enhance Clapham Junction's existing retail provision", along with leisure and night-time uses, and new offices. Similarly, we would wish to help in considering how to guard against over-concentration of similar uses; to retain retail floorspace to maintain a strong retail core for the long term; to preserve continuity of active frontages, with shopfronts; and to restrict conversion to residential uses to rear and to the upper floors of premises used for commercial or community uses, as set out in the policies LP45.</li> <li>To improve the desperately poor access to the town centre from the north via Falcon Road, especially the tunnel under the railway; and to find ways to take forward the proposals to create a visually attractive, environment-friendly and safe route through Battersea from the River Thames to the far end of Northcote Road.</li> <li>To promote mixed-use development at the four sites identified in the Plan (CJ1-4) around the railway and the station.</li> <li>To improve public transport services and interchange, with more space for pedestrians and bus passengers, and to reduce the volume and impact of through traffic.</li> <li>To enhance the quality of the public realm, with the possibilities for new public spaces (with parklets, water fountains etc), and high-quality green features which connect with nearby green open spaces.</li> </ul> <p>In dealing with these and other issues - imaginative responses, of the kind now being discussed by landowners and developers, community groups and policy makers across London and the country, will be essential. Appropriate measures might include developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management; and the development of arts and cultural uses such as a cinema. Action on these and other issues is urgent, and we cannot afford to wait upon major developments in and around the station that may not take place, if at all, for a decade or more. We are eager to</p>	<p>Comments noted. The Area Strategy for Clapham Junction recognises that Crossrail 2 might be negatively impacted by the Coronavirus pandemic, and it therefore takes the position that redevelopment should still come forward where it is of a suitable scale, stating: "Notwithstanding, the longer-term impact of the Covid-19 pandemic on the project is yet to be determined, and as such this Area Strategy takes a pragmatic view, outlining how opportunities can also be promoted in the shorter-term by facilitating development changes in and around the Station, were the Crossrail 2 project or other station improvements not to come forward within the timescales of the Local Plan."</p> <p>The impact of the introduction of Class E, which collates previous Use Classes within a new 'commercial, business and service uses' class has reduced the Council's ability to influence changes of uses within this class which do not require planning permission. In conjunction with this, the draft Local Plan therefore takes a more flexible approach to the location of town centre uses within its identified centres, including Clapham Junction, and it is understood that such flexibility has been welcomed as a means to help reduce vacancies in these locations (indeed this was the Government's stated purpose of the legislation). That notwithstanding, the Council continues to exercise influence over applications for development which require permission, and considers that it is important within the Local Plan to identify a strategy for appropriate uses - such as those relating to retail, leisure and night time economy, and office and economic floorspace - as well as for their location within Clapham Junction (and elsewhere) and for how the units present an active frontage to the street. This is set out within paragraph 19.20 of the supporting text.</p> <p>Furthermore, the Council is able to exercise greater development management control over a number of allocated sites within the centre, all of which require mixed use development, including in certain circumstances specific uses (even with Class E).</p> <p>Site Allocations CJ1, CJ2 and CJ3 require improvements to the tunnel under the railway on Falcon Road to improve pedestrian access from north.</p> <p>The representation identifies the introduction, by the Government, of permitted development rights relating to the change of use from Class E to residential uses. The Council are considering proposals to take forward an Article 4 Direction to limit the extent of this PDR with respect to various locations, including part or all of Clapham Junction.</p>	<p>Reference included to working with the Junction BID and other stakeholders to promote Clapham Junction as a successful centre with a strong retail and cultural offer. Reference included in Vision and Policy PM4 to enhancements to Falcon Road bridge including pavement widening, lighting and artwork</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>engage with the Council and others both to find practical measures in the short term and to re-imagine what the future of the town centre might be.</p> <p>Finally, we should note that the area covered by the Junction BID extends further than the town centre as defined in this and previous Plans, along St John's Hill to the west and Northcote Road to the south. The limited degree of protection for premises in the town centre does not for the most part extend to the commercial premises in these locations. The Retail Needs Assessment commissioned by the Council suggests that it should review its town centre and other boundaries, and its strategic approach to designated frontages, which have not been reviewed for many years. There is no indication that the Council has done so, and we suggest that it should. We believe that there are many unexamined peculiarities relating to town and local centre boundaries, and to the distinctions between core, secondary and other frontages across the borough. The current designations are not fit for purpose, and this may lead to perverse decision-making. For similar reasons we urge that the placemaking policy PM4L (p.116) for the reinstatement of traditional shopfronts in St John's Road and Northcote Road should be extended to cover other parts of the town centre including those parts of St John's Hill, Lavender Hill and</p> <p>Battersea Rise that are in Conservation Areas.</p> <p>Yours sincerely</p> <p>Roz Lloyd-Williams ( and, on behalf of The Directors of The Clapham Junction BID Board)</p>		
Dr David Curran	Lavender Hill for Me			1160	6.1	<p>Area strategy: Clapham Junction&amp; York Road / Winstanley(Local Plan page 111)</p> <ul style="list-style-type: none"> <li>We note there is significant uncertainty on the scope and timing of Crossrail 2 (following it recently being put 'on hold') as well as on Network Rail's redevelopment plans at Clapham Junction (which are not contingent on Crossrail2 and which can proceed independently, but which may be affected by wider economic issues affecting the rail network). The area strategy as a whole may be slightly too heavily focussed on the potential of the transport interchange, and we consider the wider economic activity within the area is maybe undervalued.</li> <li>We consider that the strategy underestimates the demand for office space. We note that plans for the former Debenhams building are primarily office based, and that the strong connectivity of Clapham Junction and the major planned development of residential units should be accompanied by a strengthened office sector in the area, to maximise the scope for local Office and 'daytime' town centre uses should have a significant place in new development south of the railway to reduce the risk of the town centre becoming a dormitory</li> <li>Paragraph 6.3: We support the recognition of the presence of a significant number of artists' studios at the Battersea Business Centre, which are important driver of a part of the local economy and add a certain economic diversity to this area of Battersea.</li> <li>Paragraph 6.4: We note there is a little more office space within the area than reported here –examples include Shakespeare House (168 Lavender Hill), Mortimer House (230-236 Lavender Hill), and 64 and 66 Altenburg Gardens (and we separately make a suggestion that some of these locations be designated as Economic Use Protection Areas). We suggest that these be briefly acknowledged as smaller offices on Lavender Hill. We also propose that there development of Debenhams / Arding and Hobbs to Class E use expected to be offices (having received planning permission for development and extension, with preparatory work initiated) be explicitly mentioned.</li> </ul>	<p>The Area Strategy takes a pragmatic view, outlining how opportunities can also be promoted in the shorter-term by facilitating development changes in and around the Station, were the Crossrail 2 project or other station improvements not to come forward within the timescales of the Local Plan. This will be considered as part of the masterplanning process</p> <p>The Area Strategy - and related policies such as LP 36 (Promoting and Protecting Offices) - are supportive of offices locating within the Town Centre, in particular as part of larger developments above the ground floor (where there is a designated frontage), and the vision for the area set out in paragraph 6.13 identifies the role of 'commercial space'. Office development is specifically identified within site allocation CJ2 (Clapham Junction Station Approach), and would be permitted within Site Allocations CJ1 (Asda, Lidl and Boots site, Falcon Lane) and CJ4 (Land at Clapham Junction Station). PM4 Smart Growth Policy E identifies that "New office provision will be supported as part of the mixed use redevelopment of growth sites associated with Clapham Junction Station", however it is not intended to limit office redevelopment to these locations, and should be amended accordingly. The supporting text of paragraph 6.4 notes that "Given the high levels of connectivity to the town centre, and the opportunity that Clapham Junction station offers, it is anticipated that there could be further potential for offices". This latter sentence should be amended to state the need more clearly. Reference to the new provision at the Arding &amp; Hobbs building is relevant and should be included.</p> <p>The smaller office provision on Lavender Hill makes an important contribution to supplement the relatively limited provision within the rest of the Town Centre boundaries, and it is considered helpful to make reference to this within the context section of the Area Strategy.</p> <p>The positive contribution of Battersea Central Library is noted.</p> <p>It is agreed that the lack of active frontages contributes to the lack of activity on Falcon Road.</p>	<p>Paragraph 6.4 has been amended to make reference to the smaller scale offices on Lavender Hill, and to clarify the potential for office development, as well as to the new provision as part of the redevelopment of the Arding &amp; Hobbs building.</p> <p>Paragraph 6.10 has been amended to mention the lack of active frontages on Falcon Road. Paragraph 6.8 has been amended to include reference to Battersea Central Library</p> <p>Policy PM4 Smart Growth Part E has been amended to clarify that offices uses are appropriate in all town centre locations as part of larger mixed use redevelopment, but particularly sought in growth locations associated with Clapham Junction Station. Site Allocations CJ1, CJ2 and CJ3 have been amended to include requirement for attractive and active frontages on Falcon Road.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>Paragraph 6.8 –We suggest in passing also mentioning Battersea Central Library, which makes an impact due to its prominent location at the top of Lavender Hill.</li> </ul> <p>Paragraph 6.10: In addition to the point regarding Falcon Lane (which we agree with), we suggest that the poor street frontages at ground level along Falcon Road in this area also contribute to the severance, with both the PCS building and the retaining wall supporting Lidl's car park enhancing the sense of disconnection between the northern part of the town centre and the core commercial centre. While there is only limited scope to enhance the lengthy railway underpass, as a matter of principle, any adjacent developments on Falcon Road should prioritise actions to enhance the attractiveness and activity of this road connection.</p>		
DTZ Investment Management Limited	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP	1250	6.1	<p><b>See attached the full representation for context and images.</b></p> <p>AREA SPATIAL STRATEGY FOR CLAPHAM JUNCTION</p> <p>The 'Pre-Publication' Draft Local Plan contains spatial strategies for the areas of greatest change within the Borough, which provide a framework for how new development in these areas should be designed and planned for in order to meet the vision and objectives of the Local Plan.</p> <p>Whilst our Client is generally supportive of the Vision for Clapham Junction, which includes the delivery of 21st century urban heart and providing inclusive and connected public realm, our Client considers that the Vision should be widened to include greater aspiration for the soon-to-be designated Opportunity Area ('OA') under the new London Plan. Table 2.1 of the Publication London Plan identifies an indicative capacity for 2,500 new homes and 2,500 new jobs the Clapham Junction OA over the plan period.</p> <p>Our Client notes that Policy SD1 of the Publication London Plan requires that Boroughs clearly set out how they will encourage and deliver the growth potential of OAs, and support development which creates employment opportunities and housing choice for Londoners. Therefore, the Council must consider their plan making duties in the round and develop a clear vision for where growth is to be directed. The current wording of the 'Pre-publication' draft Local Plan fails to acknowledge this potential for growth which represents a missed opportunity to proactively plan to realise the Mayor's vision for an ambitious, imaginative and inclusive approach to development in OAs.</p> <p>In light of this, our Client suggests that supporting paragraph 6.1 of the Area Spatial Strategy for Clapham Junction is reworded, with additional wording set out in red below:</p> <p><del>"6.1 ...The Clapham Junction and York Road/Winstanley Regeneration Area is identified in the emerging [adopted] London Plan as a nascent Opportunity Area reflecting the significant growth opportunities offered by the Crossrail 2 project and/or the potential for upgrading the existing station at Clapham Junction. Whilst at this time a master-planning exercise for the area is considered premature, the The Area Strategy would will be used to inform any future masterplan which will set out a clear strategy for accommodating growth to deliver the new homes, jobs and infrastructure envisaged by the Opportunity Area designation, or development proposals that come forward in the near-term." This will be informed by a programme of engagement and collaboration with key stakeholders to unlock sites and drive the right sort of development to deliver housing choice, employment opportunities and the necessary social and other infrastructure."</del></p> <p>The proposed amended wording to supporting paragraph 6.1 outlined above recognises the benefits of a master-planning exercise early in the plan-making process to set out a clear strategy for accommodating the growth envisaged by the OA designation. Although the Publication London Plan acknowledges that it may take some of the 'nascent' or 'ready to grow' Opportunity Areas 10-15 years to fully mature, the new Local Plan is set to guide development in the Borough over the plan period of 2023 – 2038 and therefore a master-planning</p>	<p>Comments noted. The Local Plan acknowledges the potential for growth in Clapham Junction and sets out a vision for the area. However, the Council agrees that the early preparation of a masterplan in collaboration with key stakeholders will have clear benefits for guiding development throughout the plan period and is committed to leading this process. Further amplification of the masterplanning process should be provided in the Local Plan. However, in acknowledging the growth potential of the Opportunity Area, future development will be required to respect the character and scale of the area and be well integrated with the existing townscape.</p>	<p>Area Strategy amended to define the boundaries of the Opportunity area and masterplan. Policy PM4 amended to state that master planning process will be Council led in collaboration with stakeholders and the local community. Site Allocations CJ1, CJ2, CJ3 and CJ4 amended to include reference to need to consider sites within context of masterplan</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						exercise at this early stage will have clear benefits for guiding development throughout the plan period.		
Michael Atkins	Senior Planning Officer Port of London Authority			1454	6.1	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>5. Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area</p> <p>Support the references in this area strategy on the need to enhance links between the allocations in the regeneration area and the Thames Riverside.</p>	Support noted.	No change to the Local Plan required as a result of this representation.
Katie Brown	Development Planning Manager Network Rail			1734	6.1	<p>See attachments</p> <p><b><u>Pre-Publication Draft Local Plan (Regulation 18) London Borough of Wandsworth</u></b></p> <p>Thank you for consulting Network Rail Infrastructure Ltd on the Pre-Publication Draft Local Plan (Regulation 18) for the London Borough of Wandsworth. We have the following comments to make from a Network Rail Property perspective:</p> <p>1. <u>Clapham Junction Station</u></p> <p>As referenced in the Draft Local Plan (November 2020), Clapham Junction Station is one of the busiest rail interchanges in Europe. With this comes challenging capacity issues, especially when the site is constrained within a well-established metropolitan urban setting.</p> <p>In the past there have been a number of attempts to progress a long-term strategy to redevelop the station to ensure it meets the needs of current and future customers, many of which the London Borough of Wandsworth have been involved with. To realise the renewed vision for Clapham Junction Station the proposed redevelopment works have been broken down into 3 deliverable phases:</p> <p>Phase 1: Delivering immediate safety and passenger service improvements – notably the construction of a new fire escape from the northern end of the existing overbridge to Grant Road.</p> <p>Phase 2: A reconfiguration of the 'Brighton Yard' entrance at the Southern end of the overbridge as well as additional access routes to platforms via reconfigured staircases and potentially an additional bridge.</p> <p>Phase 3: A comprehensive redevelopment scheme that would address rail capacity constraints in the Clapham Junction area as well as a significant change in how the station is laid out.</p> <p>This phased approach will provide Network Rail with the opportunity to work with stakeholders to ensure residential and commercial development is brought forward at and adjacent to the station as part of the 'rationalisation of the surrounding land' whilst safeguarded sites for the arrival Crossrail 2.</p> <p>As part of our commitment to work with stakeholders, Network Rail is currently working jointly with Stop Shop with regards to the redevelopment of the existing shopping centre at 1-20 St John's Hill. This is to ensure that there is a collaborative approach to initially improving the customer capacity provision at the station and following on from this, enabling the redevelopment of the public realm to create an inclusive and connected destination station.</p>	Comment noted.	No change to the Local Plan required as a result of this representation. Long term strategy for phased redevelopment of station to meet capacity and safety requirements to be considered as part of master planning process
Mr Tom Coates				101	6.3	In the summer the St Johns Road is pedestrianised at the weekends. Why not fully pedestrianize it for all year round, to increase footfall down the road to support the local businesses, improve air quality through reduced transport and to create a diverse hub of activity. There is even an option of putting a cycle	The Council is not currently planning to fully pedestrianize St John's Road but will seek to reduce the impact of through-traffic and provide an improved pedestrian environment in and around the town centre.	Policy PM4 A5 amended with reference to appropriate pedestrian management proposals in and around the town centre.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						route down it to connect through to the cycle highway near the Asparagus in Battersea.		
Cyril Richert	Clapham Junction Action Group			1664	6.5	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>6. Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area</p> <p>Comments in this section should be read in conjunction with Lavender Hill For Me community group suggestions and the Battersea Society submission, which have both produced a detailed analysis of the area.</p> <p>6.5 page 111 it is anticipated that there could be further potential for offices.</p> <p>We support.</p> <p>6.5 page 112</p> <p>The Council recognises this as unique opportunity both to deliver improvements to the station and to bring forward residential and commercial development as part of the rationalisation of surrounding land, and is working with the Mayor of London and Government to deliver on this potential.</p> <p>We strongly dispute that it should a “unique” opportunity, and then that it implies a link between improvement to the station and intensification.</p> <p>We support redevelopment of the zone, and we wrote for example about the potential the arches along Grant Road. However, the current vision promoted by the Council for the past 8 years is in contradiction with the views of the local community.</p> <p>Plans already approved by Wandsworth Council are in contradiction to existing policy DMT1 that says that “Development [...] will be permitted where it does not have a negative impact on the transport system” and with the NPPF suggesting that developments shouldn’t have a significant impact on transport system. In this same paragraph 6.5, it actually acknowledges that “before the Covid-19 pandemic it was operating at close to capacity in terms of rail services and passenger numbers and suffered from over-crowding at peak times.”</p> <p>There is currently no support for the Council vision on Clapham Junction changes, and previous consultation have shown actually the local community was strongly opposing the sort of developments that the Council is promoting for Clapham Junction.</p> <p>It does not mean that there is no potential for new development, including intensification and more density. But the Council should first concentrate on regaining the trust they lost, and elaborate a strategy in line with the aspirations of the community, unlike what is currently promoted.</p> <p>We note that the Government has recently directed TfL to cease all work on Crossrail 2 beyond protecting its designated sites. Therefore, it is unlikely that any major redevelopment of Clapham Junction station will happen in the interim, which should constraint all developments in the foreseeable future.</p> <p>We do not accept the naming of Clapham Junction as “a nascent Opportunity Area” unless the surrounding area is impacted by Crossrail 2.</p> <p>We suggest amendments acknowledging that the area is sensitive and that new developments will need to reach endorsement from the local community.</p>	<p>The Council agrees that Clapham Junction has potential as an office location and that this will enhance the vitality and viability of the Town Centre. It is accepted that Clapham Junction has potential for development and that this will be required to unlock opportunities for enhancement of the station and public transport facilities. However, the Council also recognises that that development must be respectful of character and scale and well integrated with the existing townscape. Whilst the timescale for Crossrail 2 is uncertain, it is necessary for the Local Plan to consider opportunities which may come forward within the plan period to accommodate growth requirements and to improve the station and transport interchange. The designation of part of the Clapham Junction area as an Opportunity Area is considered appropriate in the Local Plan despite the delay to Crossrail 2. The designation recognises the development potential around the station and the York Road/Winstanley Regeneration Area and will allow for a comprehensive and phased approach to be adopted in accordance with the vision and principles set out in the Area Strategy and assist in bringing forward improvements to the station and transport facilities within the plan period and beyond. The Council recognises the importance of early and on-going community engagement in bringing forward any development proposals.</p>	<p>Area Strategy amended. Boundary of Opportunity Area defined to include areas with the potential for greatest change over plan period and the Area Strategy has been amended to place greater weight on the importance of maintaining and enhancing the inherent character of Clapham Junction and ensuring that future development is well integrated with the wider area. Reference now included to preparation of masterplan to address potential for mixed use development and improvements to the station and transport interchange facilities which could be implemented prior to potential development of Crossrail 2. The Local Plan makes clear that preparation of the masterplan will be led by the Council in collaboration with key stakeholders including the local community. This is reflected in amendments to Policy PM4 A3</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Chris Brodie				448	6.10	Para 6.10 acknowledges the poor quality of Falcon Lane. There should be more about the need for a stronger townscape quality to the north of St. John's Road, including active frontages to Falcon Road.	Site Allocations CJ2 and CJ3 require that future schemes bring improvements to the Falcon Road tunnel. Site Allocation CJ5 requires measures to improve the townscape to the north of Clapham Junction Station. Additional references can be added to Site Allocations CJ1, CJ2 and CJ3 to require active frontages.	Site Allocations CJ1, CJ2 and CJ3 amended to include requirement for improved townscape and active frontages on Falcon Road.  Site Allocation CJ1 amended to require active frontages to Falcon Lane
Cyril Richert	Clapham Junction Action Group			1665	6.10	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>6.10 page 113</p> <p>The railway presents a major physical barrier which confines the centre largely to the land south of this infrastructure, fragmenting the area and reducing permeability and legibility. [...] All these factors detract from the generally strong sense of place in the area, creating the need for a strategy which will conserve key characteristics which contribute to the sense of place, notably the historic, modestly scaled shop terraces, and landmark buildings.</p> <p>The current master plan developed by the Council is actually reinforcing the divide between the north and the south of the railway, with a strong promotion of dense and tall buildings in the north while the south should be preserved with the raw of Victorian terrace houses and historical assets such as Arding &amp; Hobbs, The Grand theatre, the Battersea Art Centre...etc.</p> <p>As we wrote previously about the detrimental impact created by the derelict Falcon Bridge:</p> <p>There's long been a north/south divide in Battersea, with a 'north' dominated by towers and estate layouts, and a 'south' filled with a sea of Victorian terraces – and performing better on just about any socioeconomic indicator. Having little more than this lugubrious underpass linking the two worlds only reinforces and entrenches this split.</p> <p>Unfortunately, the current vision expressed by the Council is reinforcing that situation instead of trying to improve the permeability.</p>	The Area Strategy seeks to improve permeability and legibility and north-south connections. This can be articulated more clearly in the Area Strategy Vision.	Area Strategy Vision amended to include reducing severance and improving north-south pedestrian and cycle connections including the enhancement of the Falcon Road bridge.  Added to considerations to be addressed in preparation of masterplan and barrier free route from town centre to north of station included in Design Requirements for Site Allocation CJ4.
Monica Tross	Secretary to planning committee  Battersea Society			765	6.14	<ul style="list-style-type: none"> <li>CJ1. ASDA, LIDL and Boots sites, Falcon Lane. There have been no significant developments on this site since it was included in the Site-Specific Allocations Document (SSAD) as part of the current Local Plan in 2016. Consent was granted in June 2018 for demolition and rebuilding of the Lidl store (a proposal which met none of the requirements set in the SSAD). Fortunately, Lidl decided not to proceed with the development, and the consent will lapse in June 2021. We strongly support efforts to promote mixed-use development of the site, with active frontages to Falcon Lane and Lavender Hill. It is a disgrace that half the site is taken up with carparking.</li> </ul> <p>The new site allocation largely repeats the 2016 version, but it now notes that the northern section of the site, adjacent to the railway, may be required for track/platform straightening works. This is likely to be a disincentive to developers; and we note that the last decade has shown little evidence of co-operation or engagement between the different landowners, rather the reverse. The site allocation also notes that the tunnel under (sic) Falcon Road is expected to be made more pedestrian friendly. This is mentioned again under CJ2 and CJ3; but nowhere in the Plan is it stated how this is to be achieved.</p>	Comments noted. In bringing forward Site Allocations, there will be a requirement for improvements to Falcon Road under the Railway Bridge to make it more pedestrian friendly and to enhance linkages between the north and south sides of the railway.	Design Requirements for Site Allocations CJ1, CJ2 and CJ3 have been amended to identify the area under the railway bridge as the area in need of improvement. The nature of these improvements is referenced in the Area Strategy Vision and Policy PM4 C2. The improvements will be considered through preparation of the Masterplan
Josephine Vos	Transport for London			707	6.14	Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free. We welcome the intention to seek public transport contributions to improve infrastructure and services.	The Area Strategy prioritises and promotes active travel. LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.	No change to the Area Strategy required in response to this representation
Dr David	Lavender Hill for Me			1163	6.14	Site allocations: CJ1 ASDA, LIDL and Boots sites, Falcon Lane, SW11(Local Plan page 121)	LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.  It is agreed that the lack of active frontages contributes to the lack of activity on	Paragraph 6.10 has been amended to mention the lack of active frontages on Falcon Road.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Curran						<ul style="list-style-type: none"> <li>This is probably the only major site allocation in Clapham Junction town centre that is near certain to see some redevelopment during the lifetime of this Local Plan –given that Boots’ lease expires and the site had been quietly marketed, Lidl is already exploring redevelopment options, and Asda has recently changed ownership to a more property-focussed business with substantial debt overheads to address. The other allocations are all to some extent blighted by uncertainty on Crossrail 2 and Network Rail’s future business plans.</li> <li>This site is an important retail anchor for the town centre, and also provides important local services (notably car parking for surrounding shops). It is however poorly laid out and poorly integrated to the wider centre. It could be substantially developed, and if done carefully, this could benefit the town centre. However, the current allocation seems to have changed little in recent years and merits significantly more thought.</li> <li>Following the loss of Debenhams, it becomes more important to safeguard the provision of some ‘destination’ retail in the town centre, or we risk imperilling the viability of many smaller traders who rely on the traffic generated by these large businesses. This is also the only ‘large’ supermarket in the town centre; and we understand that mid-sized Lidl were also unable to find an alternative nearby site to trade from during their previously planned rebuild. The retail function at this site is therefore important in its anchor nature and its uniqueness, and while the site undoubtedly has huge scope for densification and intensification of use, it is essential that this site allocation be carefully considered to preserve activity other than creating a vast complex of dormitory flats. The recent precedent of the redevelopment of two large retail warehouses north of Wandsworth Town station does not augur well in this regard. Despite all the recent changes, retail remains a significant anchor and driver of the sense of place in our town centres. We therefore believe a more prescriptive allocation is therefore essential in this case. We propose that the overall quantum of Class E / retail floorspace should be explicitly preserved within any new development, with reprovision of a significant number of mid-sized and larger units of type that remains important, but which cannot be found elsewhere in the town centre.</li> <li>This site has excellent public transport access and good views over the railways and towards central London, and we propose that significant office development could form part of any redevelopment plans. This is one of relatively few large sites in Clapham Junction that could create significant office employment, if modern offices of sufficient quality were delivered.</li> <li>The proposal for a square at the top of Lavender Hill is welcome but should be strengthened, given that there is currently an open area with good sightlines and sunlight –we propose that the site allocation should go somewhat further and require that this should be retained and enhanced, with active uses around the new square.</li> <li>The current site also provides significant ‘town centre’ car parking, which despite all the shift to other transport means, remains open on a no-purchase-necessary basis as a core requirement of the original development. Clearly any new development should and will clearly move this all underground –however we propose that significant public car parking is important to aid mobility and access to the town centre as a whole, and to maintain the viability of a number of businesses in the surrounding area as well as to reduce pressure on neighbouring residential parking areas -and this open access car parking should be retained in any new development of this site.</li> <li>Site layout –Lavender Hill is the most visible part of the site and development there should be in broad proportion to the existing urban</li> </ul>	Falcon Road. Policy PM4 supports proposals which protect and enhance existing retail provision.	Site Allocation CJ1 amended to include reference to retention of retail uses as part of mixed-use development.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>grain, and maintain active commercial frontages—to compliment the predominantly Victorian and 1950s townscape around the site. An active frontage should also be developed on the part of the site facing Falcon Road, to maintain town centre continuity between Clapham Junction and the area north of the railway. A suitably attractive and proportioned appearance should also be delivered to avoid overshadowing of the Dorothy Road parklet.</p> <p>Access: The existing pedestrian access to Dorothy Road, which allows passage through to Falcon Lane, should be retained in any new development in order to enable site permeability and encourage walking.</p>		
	Imperial College London	Charlotte Orrell	Senior Futures Consultant Iceni Projects	1237	6.14	<p>The Griffon Studios site appears as an island in between the two allocated sites and the Clapham Junction Station. The site is extremely prominent position upon exiting Clapham Junction Station from the north and also acts as a signifier of the entrance to Winstanley Road toward the Winstanley Estate regeneration scheme. Due to its prominence and positioning, the site clearly has an important role within the regeneration of the north of Clapham Junction Station and to achieving the Boroughs aims for the area.</p> <p>In its current form the site provides student accommodation only, with no ground floor uses or street level activation. The site is fenced off from the public and provides no publicly accessible space or public realm contributions. The design of the building is poor and will not positively complement the surrounding regeneration in its current form.</p> <p>It is clear that the site could positively contribute to the area and Local Plan aspirations through a mixed-use development. A mixed-use development on this site would support the Clapham Junction Area Strategy and would provide active ground floor uses in this part of Clapham Junction. Due to the evolving surrounding context, it is evident that the site is suitable for a tall building, which is sensitive to and takes into account the local context. A tall building in this location would aid in wayfinding, whilst also signifying the entrance to both Clapham Junction Station and toward the Winstanley Estate. The redevelopment of the site would allow for significant public realm improvements in addition to enhanced connectivity through the site.</p> <p>As explained above, enhancements to the site will be severely constrained by the proposed Policy LP30. We have demonstrated why this policy needs to be altered and the implications this could have on redeveloping or improving a site such as Griffon Studios. As current and proposed policy limits the development potential of the site in achieving the council's spatial strategy, we strongly recommend that in any event, the Griffon Studios site be allocated to ensure its contribution to the Clapham Junction Area Strategy can be realised within the Plan period.</p> <p>To aid the council in considering the site for allocation, the following provides an indicative site allocation description for the Griffon Studios site:</p> <p><b>Site Allocation –Griffon Studios, SW11</b></p> <p>Site Allocation: A mixed-use development with commercial or town centre uses on the ground floor and student accommodation / residential / commercial above. Other appropriate uses including hotel, cultural, leisure and entertainment.</p> <p>Site Description: The site is bounded to the west by Winstanley Road and to the south by Grant Road, beyond which is the northern entrance to Clapham Junction Station. The site is currently used for student accommodation only.</p>	<p>The site is considered to not require an allocation. See the Site Allocations Methodology Report.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p> <p>Please refer to comment 1235 for response to policy LP30 (now LP28).</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Development Considerations:</p> <ul style="list-style-type: none"> <li>• Uses –Loss of existing student accommodation on site is restricted by existing and proposed planning policy, subject to demonstrating a lack of need and in any event, limited to residential uses only.</li> <li>• Tall Buildings -In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the site is located in an area which has opportunities for tall buildings within a local context.</li> </ul> <p>Public Realm –The current public realm is poor and closed off to the public. Any application should open up the site to provide public access at street level and provide improved public realm and routes through the site. The site to be explored in conjunction with the adjacent York Road / Winstanley Estate regeneration (CJ5) particularly in regards to improved connections the northern entrance to Clapham Junction Station and the Winstanley Estate</p>		
Cyril Richert	Clapham Junction Action Group			1667	6.14	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>Site Allocations</p> <p>CJ1 ASDA, LIDL and Boots sites, Falcon Lane, SW11 page 121</p> <p>The site allocation is poorly detailed, and we regret that no previous community engagement response was considered when redacting this section. The lack of connection with the town centre is mentioned but no proposal is formally made to remedy. The document says there are elements which detract from the sense of place, “creating the need for a strategy which will conserve key characteristics which contribute to the sense of place, notably the historic, modestly scaled shop terraces, and landmark buildings” and we fail to understand how that translate into the vision for the site. No consideration is given to the fact that the core area of Clapham Junction, including the station, is currently the heart of a conservation area.</p> <p>Conservation area matters</p> <p>Focusing on Clapham Junction area there is an absence of Map for Conservation area in the Local Plan. Therefore, we will refer to the current Map of Heritage Assets<sup>32</sup> for comments.</p> <p>The designation of the station area as “conservation area” raises many questions:</p> <ol style="list-style-type: none"> <li>1. Why are the new 8-storey Travelodge hotel and the new adjoining properties with the same owner (erected in 2013-2014) included into the conservation area? Local residents will still remember the 16-storey tower that was suggested (by the Council officers, according to the architect) in 2009 to replace a 4 storey-office building. Being in the conservation area did not prevent the Council to approve a scheme at odd with the scale of the neighbouring properties.</li> </ol> <p>In addition, the map does not mention the house #22 Mossbury Road in the local assets list (the house is one of the oldest in Battersea, dating from the very first years of the nineteenth century and so about 200 years old). That house is mentioned in the tithe map of 1838. The OS map of 1896 shows the current layout of Mossbury road with most of the existing terrace houses allegedly built by developer Alfred Heaver. Therefore, it would make more sense to include the whole of Mossbury Road into the conservation area, rather than only the part that has actually been recently constructed with modern structures.</p>	<p>Existing buildings on site allocation CJ1 do not positively contribute to the sense of place.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The designation of Shaftesbury Park Estate Conservation Area was subject to public consultations. People in the conservation area were consulted for their views on this document in November and December 2008 and a public meeting was held at Shaftesbury Park School on 11th December 2008 to discuss it. More detail is contained in the relevant Conservation Area Appraisal and Management Strategy.</p> <p>It is agreed that future proposals should have an acceptable impact on the amenities of the occupiers of adjacent Mossbury Road properties.</p> <p>It is agreed that active street frontages should be provided to Falcon Lane.</p> <p>LP52 Parking, Servicing and Car Free Development explains that car parking in new shopping and leisure developments in town centres must provide short stay parking and serve the town centre as a whole rather than being reserved solely for use in connection with the proposed development.</p> <p>LP1 Urban Design explains that proposed developments must provide recognisable, permeable and legible street networks which would apply to any redevelopment of the site allocation and the routes through the existing car park.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of ‘what is a tall building’. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	<p>Site Layout' requirement of CJ1 has been amended to require active frontages to Falcon Lane and ensure that future schemes have an acceptable impact on the occupiers of adjacent Mossbury Road properties.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2. We support keeping the whole of the train station within the conservation area. However, we wonder about the seriousness of the Council regarding the treatment of the conservation area in view of the past plans (residents will remember the 42-storey skyscraper plans) and the current discussions we have with Network Rail. According to <a href="http://historicengland.org.uk">historicengland.org.uk</a>, "Conservation area provides a basis for planning policies whose objective is to conserve all aspects of character or appearance, including landscape and public spaces, that define an area's special interest". There is a lack of understanding how the Council can adhere with this definition and consider schemes aiming at changing drastically the layout of the area. This needs to be clarified.</p> <p>Falcon lane realignment and development First of all, it must be considered that the rear gardens (between 1 and 2 meters deep) of Mossbury Road properties are so tiny that any development in front will strongly affect their privacy beyond dispute.</p> <p>OAK Trading (which developed the Travelodge hotel at 155 Falcon Rd) objected in previous Planning consultation that any new residential development above ground floor level would surely need south facing windows which could harm the amenity of the houses in Mossbury Road (although there could be some mitigation by offering extension of existing properties by land purchase).</p> <p>Any reasonable view will concede two realistic solutions:</p> <ol style="list-style-type: none"> <li>1. to offer extension of existing properties by land purchase,</li> <li>2. to redevelop the open area with public space/square, which is in line with PM4, saying: "The development opportunities set out within this Area Strategy offer the prospect for inclusive public realm and open space provision to reinforce connectivity, support wellbeing and contribute to quality of life."</li> </ol> <p>Retail</p> <p>Most of the area is occupied by Class E buildings. With the recent loss of Debenhams Asda and Lidl are now the most important employers at Clapham Junction. Any further loss of retail provision will be highly damageable for Clapham Junction.</p> <p>It is suggested to safeguard the Class E provision on those sites. To go further, the lack of large premises available in the location has been an important element in the decision to pause Lidl development (see below).</p> <p>Lidl site</p> <p>It must be noted that Lidl has tried to find a temporary site to continue operating while redeveloping the site and was unable to do it. As a consequence, Lidl has currently paused the project (the current planning permission p.a. 2017/2972 will run out in 2027).</p> <p>One of the aims of the proposal was to bring a more active frontage on Falcon Road (similar to Sainsbury in Fulham, Townmead road), where one entrance will be located, and attract more people coming from the station.</p> <p>Active frontage facing Falcon Road should be encouraged on this site.</p> <p>Boots site</p> <p>Boots Clapham Junction occupies a 0.77-acre site situated on Falcon Lane situated a few metres to the east of Clapham Junction railway station. The Boots site is actually not extending to the railway due to the location of the rail exchange building. A development of a series of buildings up to 11 storeys was</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>proposed in 2018, mostly seen as a valuation exercise and was considered as overdevelopment by the community, with great impact on the nearby properties.</p> <p>Asda site</p> <p>The Asda car park is a "town centre" car park where you can park for free for 2 hours (£10 for 24h). Therefore, any redevelopment removing this facility will create detrimental effect for the entire area of Clapham Junction and must be prevented.</p> <p>A path exists for pedestrian to join Falcon Lane and Dorothy Road, through Asda car park, and must be preserved.</p> <p>There is an opportunity to redevelop and optimise the use of the Asda site. Although taller buildings could be located toward the railway line, the site is surrounded by lower 2-3 storey Victorian terrace houses and therefore it prevents high rise closer to the neighbouring properties and directly facing Lavender Hill. It was properly considered in the SSAD 2009 which said:</p> <p>Site Allocation (2009 version, p85): Tall buildings would be best located towards the railway frontage to reduce their impact on the residential area of Mossbury Road, and the conservation area.</p> <p>The Asda site is sensitive and must be carefully assessed in order to preserve the Clapham Junction area south of the railway, including the views with the iconic building of Arding &amp; Hobbs.</p> <p>It should be noted that:</p> <ul style="list-style-type: none"> <li>- Active frontage is encouraged on Falcon road.</li> <li>- Due to the site being surrounded by lower 2-3 storey Victorian terrace houses, tall building should be refrained. However, carefully designed taller building could be appropriately placed along the railway, especially for Boots and Asda sites.</li> <li>- Permeability is essential and it must be noted that access to Dorothy Road from Falcon Lane (through Asda car park currently) must be preserved.</li> <li>- Any development should abide the minimum separation distances of 18-21 meters, as per the London Plan, and should consider a land offer for properties fronting Mossbury Road to prevent over-shadowing and privacy issues.</li> <li>- The current Asda car park is used as a town centre car park. Therefore, it will act as a constraint that should be included in any proposal, to maintain this provision.</li> </ul>		
Rebecca Skinner	Peabody and Mount Anvil	Miss Ailish Collins	Planning Consultant Rolfe Judd Planning	1374	6.14	<p><b>See attachment for plans, appendix and background context.</b></p> <p>Representations on the Draft Local Plan Issues Document</p> <p>The draft Wandsworth Local Plan has been reviewed with specific reference to the Peabody Estate site, which our client (Peabody) owns and is currently developing, in accordance with the approved planning permission 2017/5837.</p> <p>Under the currently adopted local plan, the Peabody Estate is identified as providing an opportunity to deliver a modern residential development to meet housing needs, and to provide mixed use development along the St John's Hill frontage to integrate the site within the wider town centre. This policy direction for the site was supported by the site specific allocation, as well as the inclusion of the northern part of the site within the town centre boundary. Planning permission was subsequently approved for a high density residential</p>	Site Allocation added to the Local Plan	Peabody Estate has been added to the Site allocations as Site Allocation CJ6



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>development, with supporting commercial and community uses which sought to deliver these aspirations set out in the Local Plan.</p> <p>Although planning permission has already been approved for the site, construction of Phase 3 has not yet started (Phase 2 currently under construction), which is due to deliver a large number of homes. It is therefore important for our client that the policy direction set out in the draft Local Plan continues to be supportive of the undeveloped part of the site as an appropriate location for mixed use development and tall buildings, given the existing planning permission. From review of the draft plan, it appears that the site has not been included within a number of designations which would support additional development to deliver the final phase and ensure the full development capacity of the site is achieved (including provision of affordable housing). These have been addressed in greater detail below.</p> <p>Site Allocation</p> <p>Under the adopted Wandsworth Local Plan, the site is allocated as site specific allocation 64 'Peabody Estate'. The allocation has been applied to the site as being appropriate for "residential use with a small amount of town centre use along the St John's Hill frontage". The allocation sets out the general aspirations for the site and the anticipated approach for public space, streets, street blocks, buildings, infrastructure and energy.</p> <p>Policy SS1(A) (Spatial Development Strategy) states that growth and new development will be directed to the borough's Investment and Growth Areas, town centres, and Site Allocations.</p> <p>Policy PM4 (Smart Growth) part A states that "additional new homes will be directed to Site Allocations, with the highest capacity in the growth locations adjacent to Clapham Junction Station and at Falcon Lane".</p> <p>The Peabody Estate benefits from an approved permission, however, as the development is still under construction (with Phase 3 yet to break ground), the scheme could still be subject to change. Retention of the site allocation recognises that there could be further development opportunity to fulfil, and particularly ensuring the capacity and deliverability of new homes is maximised (including affordable housing) in line with wider policy aspirations.</p> <p>Policy SS1 and PM4 above acknowledges the importance of site allocations to directing growth and development, with particular reference to the Clapham Junction Train Station as a high capacity growth location. It is therefore considered that the Site-Specific Allocation 64 should still be retained for the site, as this sets out a supportive policy framework for the development within the Local Plan.</p>		
	Wandsworth Cycling (London Cycling Campaign)			211	6.24	This must be requirements, and a safe cycling lane (traffic free) is also required	Agreed.	The site allocations movement requirements have been amended.
Monica Tross	Secretary to planning committee Battersea Society			766	6.27	<p>CJ2. Clapham Junction Station Approach. On this site too there has been little development since it was included in the 2016 SSAD. Network Rail and others, however, have developed outline proposals for the complete redevelopment of the station, including this site. With large-scale mixed-use development on top of the station, this would be significantly larger in scale than the recent redevelopment of London Bridge Station, and Government support for such a development is uncertain. The draft Plan notes that any redevelopment of the station approach site must not prejudice any larger scale redevelopment, which is likely to require land at the north of the approach site. Again, this is likely to be a disincentive to developers. Hence it is unlikely that the proposed – and highly-desirable - public square will be created in the foreseeable future. In the paragraph under Movement, we do not understand what is meant by the sentence "As the southern entrance connects to the site, it should provide space for the pedestrian pathway to continue".</p>	Comments noted. The design requirement for movement expects proposals to connect the north east corner of the site to positively connect to Falcon Road and in particular the area under the railway bridge and for the pedestrian and cyclist environment to be improved.	The Masterplan will provide a framework for consideration of development proposals for Site Allocation CJ2 in the context of the station and its wider environs. Site Allocation CJ2 amended to reflect this.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Josephine Vos	Transport for London			708	6.27	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free.</p> <p>TfL welcomes references to Crossrail 2. A project update is provided above.</p> <p>TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p> <p>We welcome the intention to work with Network Rail and TfL to secure suitable stopping facilities for buses and taxis, bus standing facilities and adequate cycle parking close to the station entrance.</p>	The Area Strategy and Site Allocations promote active travel. LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.	No change to the Local Plan required as a result of this representation.
DTZ Investment Management Limited	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP	1251	6.27	<p><b>See attachment on comment 1250 for the full representation for context and images.</b></p> <p>EMERGING ALLOCATION: CJ2 CLAPHAM JUNCTION STATION APPROACH, SW11</p> <p>The Site is allocated within the 'Pre-Publication' Draft Local Plan under emerging site allocation CJ2 (Clapham Junction Station Approach, SW11). Our Client continues to support the allocation including our Client's site and the PCS Building, which sits outside of the Client's ownership.</p> <p>Emerging site allocation CJ2 promotes a mixed-use development including residential and offices, and also business, hotel, cultural, leisure and entertainment. DTZIM are supportive of the uses considered appropriate as set out within the site allocation. Our Client is producing a Vision document which will articulate the vision and key aims of any future redevelopment including the following:</p> <ul style="list-style-type: none"> <li>• developing a 21st century urban heart which focuses on an improved transport interchange and delivers a high-quality mixed-use development.</li> <li>• creating a generosity of public space that provides a sense of place and identity for those using the station.</li> <li>• creating permeability and legibility between the site and the wider town centre and improved station access based on pedestrian desire lines.</li> <li>• enhancing the retail offer allowing for the station to become a welcome location for meeting friends or holding business meetings.</li> <li>• ensuring that any proposals form part of the vision for the ongoing regeneration of the wider area.</li> <li>• enhancing the area's cultural and creative character by ensuring that development makes provision for cultural, creative, visual and performing arts and other forms of community innovation; and</li> <li>• providing both for additional housing but also increased workspace.</li> </ul> <p>Our Client is keen to ensure that the vision for the redevelopment of the Site is consistent with the objectives of the Area Spatial Strategy for Clapham Junction and emerging site allocation CJ2 (Clapham Junction Station Approach, SW11).</p> <p>Our Client supports the identification of the potential of the Site to deliver new jobs and homes in the early phases of the London Plan. It is considered that this would contribute to the delivery of much-needed homes and jobs and transform the experience of those who use Clapham Junction Rail Station in the short-to-medium term. Given the current issues with the configuration of the station access and lack of permeability through the Site from the rest of Clapham Junction Town Centre, it is considered that the delivery of a scheme within the early stages of the Plan should be incorporated into any master-planning exercise commissioned by the Council.</p>	Comments noted. Any phasing will be considered as part of the Master planning process for the site.	Further details provided of master planning process

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						As outlined above, collaborative work has already been undertaken with Network Rail to ensure that this does not prejudice any future development of the main Clapham Junction site and it is our Client's intention to continue this engagement as the Client team work towards commencing the preparation and submission of a planning application for the redevelopment of the Site.		
Cyril Richert	Clapham Junction Action Group			1668	6.27	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>CJ2 Clapham Junction Station Approach, SW11 page 122 The tunnel under Falcon Road is expected to be made more pedestrian friendly Nobody likes the Falcon Road railway bridge. Dark, dirty, loud and always mysteriously wet, the prospect of running the gauntlet of drips from the leaky bridge structure (or – worse – from the many resident pigeons) discourages non-residents from venturing up the Falcon Road. But like it or not, it's unavoidable lowlight for those of us who live north of the railway. This isn't good for Clapham Junction. There's long been a north/south divide in Battersea, with a 'north' dominated by towers and estate layouts, and a 'south' filled with a sea of Victorian terraces – and performing better on just about any socioeconomic indicator. Having little more than this lugubrious underpass linking the two worlds only reinforces and entrenches this split. The grim and faintly menacing nature of Falcon Bridge also limits the trade for the businesses on the Falcon Road – which don't see much benefit from being so close to St John's Road and the otherwise successful wider shopping district. Therefore, it should be a primary concern for Wandsworth Council (through CIL funding maybe?) rather than waiting private developers to use this opportunity to balance otherwise undesired proposals.</p> <p>Concept proposal</p> <p>It is worth mentioning that a concept proposal was published in 2019 for the full redevelopment of Clapham Junction station and wider area. The plans were developed by consultants Mott MacDonald, contractor Laing O'Rourke and architect Hawkins Brown, and is at this early stage more of a concept of how things could look, rather than the final masterplan of what will be built, according to the well informed ianVisits blog.</p> <p>According to their own statement, their aim is "to encourage in depth debate with other industry experts and stakeholders on how to translate enthusiasm for oversight development into deliverable plans." 33</p> <p>The most important element is the careful approach to tall building on this site (mostly preventing) and the idea of erecting a deck above the tracks with buildings above.</p>	Comments noted. The Local Plan supports the enhancement of The Falcon Road bridge. The use of CIL to improve Falcon Road is not within the remit of the Local Plan. The Local Plan supports the preparation of a masterplan for the station and adjoining sites.	Reference to the requirement for enhancement of the Falcon Road bridge strengthened in Policy PM4 and site allocations. Further details of masterplanning process and need for a comprehensive approach to future of the station and adjoining sites added.
DTZ Investment Management Limited	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP	1252	6.35	<p><b>See attachment on comment 1250 for the full representation for context and images.</b></p> <p>PUBLIC SPACE AND PERMEABILITY</p> <p>Emerging site allocation CJ2 seeks the delivery of a new public space that acts as meeting space to be considered as part of any development proposal, preferably in conjunction with the main entrance to the station. The emerging site allocation also stipulates that any future proposals should include a considered, landscape-led public realm, and integrate with the town centre. This is reflected in the Clapham Junction and York Road/Winstanley Regeneration area diagrams provided at pg.199 and pg. 200 of the Pre-Publication Draft Local Plan which include suggested locations for new public open spaces and suggested/proposed new routes through the Site.</p> <p>The provision of new public space on the Site should be well-considered, sufficient to be enjoyed by the public and those who use the station and should not comprise a series of token spaces purely to satisfy policy. Our Client would suggest that the public space to be provided is focused on the centre of the Site, as this would deliver the most benefits of those using the station. As a result of this, the smaller circle which currently shows the provision of new public open space within the western part of the Site could be omitted, and</p>	Comments noted. Map 6.1 and 6.2 both show suggested location for new public open space. While the provision of open space is a requirement the exact location of the site, routes, and open space can be amended and discussed as part of any proposal for redevelopment.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>replaced with a suggested / proposed new route to indicate permeability between St John's Hill and the main public realm at the core of the Site. The constrained nature of the Site needs to be recognised when considering opportunities for the provision of public space which will need to be balanced against the other objectives of the emerging site allocation CJ2.</p> <p>Any suggested / proposed new routes through the Site should have regard to pedestrian desire lines from the station to the rest of the town centre and Lavender Hill. Our Client supports the consideration of this through the development of a masterplan, which should be informed by an understanding of the urban grain of Clapham Junction Town Centre, and undertaken in consultation with Network Rail.</p>		
Monica Tross	Secretary to planning committee Battersea Society			767	6.42	<p>CJ3. Land on the corner of Grant Road and Falcon Road. No development has taken place on this site since it was included in the 2016 SSAD, nor is any currently planned. The site is included in the York Road/Winstanley Regeneration Master Plan; but the inclusion of a large part of it among the designated work sites for CrossRail 2 has precluded any further work on plans. The Council appears to hope that this safeguarding might be amended in 2020/21 (sic); but it is unclear how the "refreshing" of the current safeguarding directions currently being discussed by TfL and the Government will affect the site. The site allocation mentions the gated housing at The Falcons which borders the site to the north (but not the similarly-gated GradPad development), along with a desire to achieve greater integration and permeability, particularly with the town centre and the Winstanley Estate. But there is no indication of how this might be achieved, or how gated developments might be persuaded to open up. Nor do we understand what is meant by developers contributing towards cost of dedication of land at the corner of Grant Road with Winstanley Road.</p>	<p>The Local Plan has been updated to reflect recent updates from TfL regarding Crossrail 2.</p> <p>Proposals for redevelopment will be required to demonstrate how their proposals achieve greater integration and permeability between the Town Centre and York Road/Winstanley Regeneration Area.</p> <p>The dedication of land at the corner of Grant Road with Winstanley Road would be to ensure it remains available for transport uses.</p>	The site allocation has been amended.
Josephine Vos	Transport for London			709	6.42	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free.</p> <p>TfL welcomes references to Crossrail 2 works sites. A project update is provided above. TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p> <p>The requirement for engagement should be with TfL rather than the bus operator because services are provided by a range of operators under contract to TfL, which is responsible for all bus infrastructure. We would want to ensure that any redevelopment proposals enhance bus passenger and standing facilities, improve operational efficiency and provide for future expansion.</p>	<p>Area strategy promotes active travel. LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.</p>	No change to the Local Plan required as a result of this representation.
Cyril Richert	Clapham Junction Action Group			1669	6.42	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>CJ3 Land on the corner of Grant Road and Falcon Road, SW11 page 124</p> <p>Arches along Grant Road</p> <p>There would be some merit in cleaning, lighting and painting the overhanging viaduct along Grant Road, where the small businesses in the dozen or so railway arches have long struggled to attract the footfall that you'd expect for the edge of a major shopping district with almost 100% occupancy of retail units, next to one of the UK's busiest railway stations.</p> <p>This is an interesting structure that could look good with a bit of TLC and some of the arches are impressively large – but it feels like there's a great deal of missed potential here. Derelict and abandoned vehicles in the car park under the viaduct only add to the general feeling of decay and neglect. Any improvement would go some way to making these feel a bit more like a part of the town centre worth visiting.</p> <p>Everyone stands to benefit from this – it's helpful to the retail centre, to residents, to developers. As a very central and visible bridge with huge levels of</p>	<p>Comment noted.</p>	Further details of masterplanning process provided and Site Allocation CJ3 amplified to include reference to arches and stakeholder engagement.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>pedestrian traffic, and scope for quick implementation, any improvement ought to play well politically. It's probably essential before the Winstanley development really gets going at scale.</p> <p>Bramlands site</p> <p>The current vision presented by the Council is to build a cluster of very tall building on the location.</p> <p>In February 2015, John Stone (Head of Forward Planning and Transportation, Wandsworth Council) wrote:</p> <p>Development of this site is a crucial element of the overall Winstanley, and York Road regeneration proposals and the viability of the overall scheme is entirely dependent on the early development of this key site.</p> <p>However, it was later confirmed that this area would remain safeguarded for Network Rail. We know nowadays that arguments raised by the Council were exaggerated and did not prevent the continuation of the regeneration project.</p> <p>It must be noted that the 2013 consultation which included a choice between several options for the Winstanley and York Road estates regeneration was not consulting on the Bramlands site: all options presented a similar development for this site. It was later revealed in a 2014 exhibition that the Council vision includes a cluster of several buildings of more than 20 storeys for this location.</p> <p>It was in breach of previous Urban Design Study (2009) which was stating: "Applications for buildings of more than 6 storeys will generally be unacceptable, and will only be considered in exceptional circumstances." 34</p>		
	Wandsworth Cycling (London Cycling Campaign)			212	6.47	<p>Improvements must include the creation of a continuous safe cycling path along Kent Road. Requirement.</p>	PM4 People First C sets out that general improvements to the public realm will create a safer and better-quality environment for pedestrians and cyclists. All new development proposals, transport and other public realm schemes, must contribute towards this.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			768	6.52	<p>CJ4 Land at Clapham Junction Station. This is a new site allocation, covering land at some distance to the west of the station, mainly in railway sidings and carriage sheds. Most of the site, apart from the former Station Master's house, is twenty feet or so below the street level of St John's Hill (not Road, as stated in the Plan) and Plough Road, with a narrow access only via the latter. The site is also designated as a work area for CrossRail 2. It is not clear whether the Council has discussed the feasibility of this proposal with Network Rail, nor what kind of development is envisaged. Would the sidings and carriage sheds be removed, or would they be retained, with development on top of them? Nor is it clear how any development might inter-relate with the CJ2 proposal for the station approach, which is more than 100 metres distant, across at least eight railway tracks, and with the Brighton Yard entrance to the station in the middle. We have severe reservations as to whether anything like what is suggested in the site allocation is feasible.</p>	Comments noted. The interrelationship of Site Allocations CJ2 and CJ4 will be considered as part of the masterplanning process including the impact on pedestrian flows of individuals using the station, the impact development could have on the operation of the train networks and the potential for over station development. More detail has been added to clarify the masterplanning process and the interrelationship between Site Allocations CJ2 and CJ4.	<p>Site description and development consideration active travel have been amended to correctly say that it is adjacent to St John's Hill not St John's Road.</p> <p>Further amplification provided of masterplanning process and interrelationship between Site Allocations.</p>
Josephine Vos	Transport for London			710	6.52	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free.</p> <p>TfL welcomes references to Crossrail 2 works sites. However, it is not clear what is meant by the site being within a '200 metre buffer'. A project update is provided above.</p> <p>TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p>	The Area Strategy promotes active travel. LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.	The references to Crossrail 2 in the Development Considerations has been updated.
Cyril Richert	Clapham Junction Action Group			1670	6.52	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p>	Comment noted.	Further amplification provided of masterplanning process and stakeholder

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>CJ4 Land at Clapham Junction Station, SW11 page 125</p> <p>Concept proposal</p> <p>It is worth mentioning that a concept proposal was published in 2019 for the full redevelopment of Clapham Junction station and wider area. The plans were developed by consultants Mott MacDonald, contractor Laing O'Rourke and architect Hawkins Brown, and is at this early stage more of a concept of how things could look, rather than the final masterplan of what will be built, according to the well informed ianVisits blog.</p> <p>According to their own statement, their aim is "to encourage in depth debate with other industry experts and stakeholders on how to translate enthusiasm for oversite development into deliverable plans." 35</p> <p>This proposal includes really tall building, especially towards Grant Road. The main idea is to erect a deck above the tracks with buildings above. Any building on such deck will start already at 6-8 floors and therefore will be immediately considered as a tall building.</p> <p>CJ4 page 125: It should be noted that in order to assess the size of any building above the tracks, the distance from the ground will be added, which will trigger the consideration on tall buildings and impact on the vicinity. Tall buildings facing St Johns Hill will be unappropriated and therefore prevented as it will have detrimental impact of historical assets of the Junction and the character of the area.</p>		engagement including engagement with local community.
	Wandsworth Cycling (London Cycling Campaign)			213	6.56	What are these? Please reference	Details of active travel enhancements have not been defined but would be expected as part of any redevelopment proposal. Reference included in policy PM4 C2 to improvements to links with Cycle Superhighway 8 on the Battersea park Road-York Road corridor and cycle infrastructure on lavender Hill together with additional cycle parking in key locations including the station.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			214	6.56	What are these? Please reference	Details of active travel enhancements have not been defined but would be expected as part of any redevelopment proposal. Reference included in policy PM4 C2 to improvements to links with Cycle Superhighway 8 on the Battersea park Road-York Road corridor and cycle infrastructure on lavender Hill together with additional cycle parking in key locations including the station.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			769	6.61	CJ5 Winstanley/York Road Regeneration Area. The Battersea Society has expressed on many occasions its major reservations about aspects of the plans for this area: about the major densification, with a more-than-threefold increase in the number of housing units; the designs, especially of the York Road towers; the failure to provide any substantial increase in the amount of affordable housing provided; the circulation of traffic in and around the area; and the impacts on congested public transport. We shall not repeat our detailed concerns here. But in the current document we are puzzled - in the light of the site allocation CJ3 - as to what might be meant by the statement that "Proposals should place a particular focus on addressing the poor urban environment at the Falcon Road end of Grant Road/Bramlands Avenue and the challenges arising from the bus stands and turning area". And we are disappointed that there is no consideration of how the current bus stand area could be developed to provide expanded bus waiting and boarding to alleviate congestion on the narrow pavements to the south of the station.	<p>Planning applications will be assessed against planning policies. The Site Allocation sets design principles and does not consider details of proposals.</p> <p>The bus stands and turning area are in CJ3 and reference should be removed from this site allocation.</p>	Site Allocations CJ3 and CJ5 amended.
Josephine Vos	Transport for London			711	6.61	Those parts of the site that fall within the Opportunity Area or have a high PTAL should be car free. Bus standing and turning facilities should be retained and improved as part of any redevelopment and contributions provided towards implementation of the York Road Corridor Study	The Area Strategy promotes active travel. LP53 Parking, Servicing and Car Free Development sets out the Council's parking policies which would apply to any redevelopment of this site.	No change to the Local Plan required as a result of this representation.
Cyril Richert	Clapham Junction Action Group			1671	6.61	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>CJ5 Winstanley/York Road Regeneration Area, SW11</p>	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>We consider the current proposal as inappropriate for the redevelopment for the area.</p> <p>The delays in the construction phases, and the deferring of the 32-storey tower presented in January 2021 should create an opportunity to</p> <ul style="list-style-type: none"> <li>• "rethink" the entire scheme</li> <li>• reduce the size of the towers and massing of the proposal,</li> <li>• improve further the provision of social and affordable housing and</li> <li>• engage truly with local community in a constructive dialogue.</li> </ul>		
	Wandsworth Cycling (London Cycling Campaign)			215	6.72	The proposals must ensure that the new routes to enable safe and continuous walking and cycling routes to and from.	Comments noted. The Area Strategy promotes active travel.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			764	Map 6.1	Site Allocations We note the two separate maps of the area on pages 119-120. Why two maps are needed is not clear; but both of them have faulty legends.	The second map provides more detail of the area around Clapham Junction Station	No change to the Local Plan required as a result of this representation. Legends to be updated
Hassan Ahmed	GLA			1121	Map 6.1	The draft Plan should set out clearly the precise boundary of the OA and should refer to the indicative figures for growth as set out in Table 2.1 of the PLP as the starting point in establishing the true potential for growth in the area. The indicative figures suggest that there is the potential to deliver in the region of 2,500 new homes and 2,500 new jobs up to 2041.	Boundary of Opportunity Area defined. It is considered likely that the capacity of the Opportunity Area will exceed the indicative target of 2,500 new homes and 2,500 new jobs to 2041 in the London Plan with the inclusion of the York Road/Winstanley Regeneration Area	Area Strategy and Area Strategy Diagram amended to include boundary of Opportunity Area
Dr David Curran	Lavender Hill for Me			1164	Map 6.1	<p><b>Site allocations: Additional proposal</b></p> <p>We propose that a new site allocation be developed for Territorial Army Centre, 27 St John's Hill. This is a mid-sized site directly opposite Clapham Junction, and while we understand its future is at this stage unclear it is known to be facing relocation plans. There is a reasonable prospect of it opening for redevelopment in the lifetime of this local plan (indeed, it is maybe more likely to be developed than several of the current site allocations given the potentially delaying impact of Crossrail 2 and the Network Rail plans). The quality of the buildings on site is poor and it can reasonably be assumed that only the street frontage may be retained—freeing up the site for comprehensive redevelopment. We suggest consideration be given to what would be appropriate or acceptable uses for this highly prominent site. Certain preferred approaches to movement, such as providing for pedestrian site permeability through to the adjacent Peabody development, may be a very desirable consideration at this stage, to ensure that ongoing development plans at both this site and the adjacent sites can be undertaken in a joined-up and holistic way.</p>	The Site has been assessed in the Site Allocations Methodology Paper. It was found to not require a site allocation. Policy PM4 A2 refers to proposals on sites other than site allocations	No change to the Local Plan required as a result of this representation.
Rebecca Skinner	Peabody and Mount Anvil	Miss Ailish Collins	Planning Consultant Rolfe Judd Planning	1375	Map 6.1	<p><b>See attachment on comment 1374 for plans, appendix and background context.</b></p> <p><b>Town Centre</b></p> <p>The adopted Wandsworth Local Plan includes the northern portion of the site (Phase 1 and part of Phase 2) within the Clapham Junction Town Centre boundary. The adopted Site-Specific Allocations Document states the following:</p> <p>"To the south-west a small part of the Peabody Estate lies within the town centre. The existing Estate is very inward looking, and any redevelopment should seek to extend the surrounding streets into the site, retaining the green space as a new urban square, which would be accessible to the residents, businesspeople and visitors. These design elements would integrate the site within the town centre".</p>	The Clapham Junction Town Centre boundary is incorrectly drawn on the Area Strategy maps for Clapham Junction on pages 119 and 120 of the draft Local Plan (Reg 18). Revisions to the boundary are not proposed, and it should therefore correctly retain the northern portion of the Peabody site (exactly as under the adopted Local Policy map).	Area Strategy Maps for Clapham Junction and York/Road Winstanley Regeneration Area have been included to include the correct Clapham Junction Town Centre Boundary, which is unchanged from that currently adopted.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The redevelopment potential of the Peabody Estate was evidently seen as an opportunity to integrate the site within the existing town centre, with a small amount of town centre uses envisaged along the St John's Hill frontage (as set out in SSA 64).</p> <p>Under the proposed draft Wandsworth Local Plan, the town centre boundary has been amended to specifically exclude the Peabody Site. The reason for this change is unclear, as it has not been addressed in the 'Policy Map Changes Document' included as one of the consultation documents.</p> <p>The specific exclusion of the site from the proposed draft Local Plan's town centre boundary unpicks the approach set out in SSA 64 for the Peabody Estate and through the subsequent planning permission, which sought to establish town centre uses along the site's frontage to St John's Hill, and to integrate the redevelopment of the site with the town centre.</p> <p>A priority of the draft Plan in is to "concentrate, where possible, new town centre uses within the borough's centres, ensuring growth and development is located in highly accessible locations and contributes to the revitalisation of the borough's high street, rather than being located out of centre locations as far as possible".</p> <p>Draft LP Policy LP36 (Promoting and Protecting Offices) sets out a "Town Centre First Approach" for new office floorspace, meaning town and local centres are sought as primary locations for new office development, with appropriate edge-of-centre locations (only as identified in the Site Allocations), as secondary locations. Although the site is an edge of centre location, the Peabody Estate is no longer included as a Site Allocation in the draft Local Plan, which would require clear justification for any new office provision on the site.</p> <p>The site is located opposite the Clapham Junction train station, has frontage to a strategic transport route, and forms a bookend to the town centre from the west. The draft Local Plan discusses the need for long term redevelopment and improvement plans for Clapham Junction station, which would form part of a broader strategy for attracting investment to Clapham Junction Town Centre. Redevelopment of land around the station for comprehensive office, retail and residential mixed-use redevelopment is also identified in the Plan as an opportunity to enable substantial improvements to be made to the station and access to it. The northern part of the site has already been identified as an appropriate location for continued town centre uses under the adopted plan and the extant planning permission, and given the desire to encourage redevelopment around the station to support the Town Centre, removal of this designation would no longer support the desired outcome for this area.</p> <p>The approved planning permission includes the provision of 569 sq. of commercial floorspace (A1-A5/B1 uses) at ground floor level across four individual units, which was supported under current policy for town centre uses. Extending the existing commercial pattern of development along St John's Hill and into the site is seen as having a positive impact on the town centre and successfully integrates the site with the wider area. Town centre uses should continue to be supported in the emerging plan through inclusion within the town centre boundary.</p> <p>It is therefore sought to reinstate the northern part of the site within the Clapham Junction Town Centre boundary.</p>		
	Asda	Mr David Brown	Director Newsteer	1533	Map 6.3	<p>Please see attached document</p> <p>These Representations are submitted to LBW in relation to part of the site known as 'CJ1-Asda, Lidl and Boots Sites, Falcon Lane, SW11'. We are encouraged that the Site has received allocation for mixed-use development and we urge LBW to retain a suitable level of flexibility in future iterations of both policy and allocations.</p>	Comment noted. The Site Allocation sets development principles and is not over-prescriptive in terms of uses.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Chris Brodie				449	Policy PM4	Northcote Road Policy PM4 Placemaking Point Estates: Action to reduce the impact of through-traffic in and around the town centre will be supported; particularly on and adjacent to Northcote Road. This will be achieved by introducing appropriate traffic calming and other traffic management proposals Point C Smart Growth alludes to something similar: Smaller-scale retail should be focused on Northcote Road, Battersea Rise and Lavender Hill and should contribute to distinctive independent and quirky character of those parades. In particular, proposals will be supported which provide improvements to the pedestrian environment or the public realm which support the street market. The amalgamation of small units to create larger units will not be supported in this location. Surely both these points need to make reference to the successful trial of Northcote Road being traffic-free at weekends last year, with any alterations to the public realm responding to such a condition? Further thought should be given to the ambitions in C2. The market shrank because of the high costs of rentals and changes to shopping habits. Moreover, storage areas for market traders inside roads have been developed. It would be interesting to know the percentage of independent shops in Northcote Road. Certainly, it will have reduced significantly in the past 10 or 20 years mainly because of increased overheads, notably rents. Unsurprisingly, the number of vacant units has increased in the past year and immediate help is needed post-covid for new businesses, both in shop units and for market traders. Not only might this boost business, it would also encourage more people to visit local shops and cafes/bars/restaurants.	The Placemaking Policy is focused on permanent changes and there are currently no proposals to change the traffic status of Northcote Road. The Plan seeks to protect and enhance the existing character of Northcote Road.  The Northcote Road Market and independent shops are identified as features of what makes this parade successful. The policy requirements set out within Smart Growth, Part C, are considered to be important in supporting these, and are consistent with the previous policy approach which identified Northcote Road as an area of specialist shopping character (now taken forward within the broader area strategy). Other complimentary uses, such as cafes, bars and restaurants, would be appropriate in this location in line with the Council's more flexible retail policies and the introduction of Class E.	Reference included in Policy PM4 A4 to introduction of appropriate pedestrian management proposals including temporary/weekend pedestrianisation of Northcote Road
Monica Tross	Secretary to planning committee  Battersea Society			763	Policy PM4	Policies for the Area  There is no attempt to relate the 23 policies for the area to the fourteen principles and themes set out in the overall Placemaking Strategy. As we have noted, it is therefore difficult to judge how the policies might fit with the principles and objectives of the Placemaking strategy. There is huge overlap and repetition across the 23 policies. Some of the fourteen principles are missing, including responsive development, 15-minute neighbourhood, and lifestyle choice; while mixed use, which is part of the Smart Growth element in the strategy, is mentioned only briefly under the Placemaking element. In many cases it is not clear how the policies and aspirations, such as improving both north-south and east-west connectivity and permeability, or reducing the impact of through traffic in and around the town centre, might be achieved. How this set of policies might support decision-making is thus far from clear.	The Area Strategy provides detail on how it will accommodate change in line with the principles of Placemaking, Smart Growth and People First. All parts of policy PM4 have direct or indirect links with the principles. In accordance with policy PM1 development proposals must positively address the Placemaking, Smart Growth and People First principles and the detailed requirements and considerations set out in the Site allocations and Area Strategy.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			706	Policy PM4	As an Opportunity Area, all residential and office development should be car free. This should be clearly expressed in policy PM4 and emphasised in all site allocations within the Opportunity Area. We welcome the commitment to work with Network Rail and TfL to deliver improvements in and around Clapham Junction station, and the intention to improve connectivity and permeability for pedestrians and cyclists and provide additional cycle parking.  We also welcome the references in individual site allocations to Crossrail safeguarding and works sites. The plan on Page 119 refers to the Safeguarded Crossrail 2 area which should clarify that this is the 2015 Direction. However, the Area of Surface Interest is not shown on the plan. It is more clearly shown in the plan on page 120. In new Directions expected later this year, it is anticipated that the areas for Crossrail 2 Safeguarding will change. Sites CJ3 and CJ4 appear to have been transposed on both plans.  We welcome the intention to reduce the impact of through traffic in and around the town centre through traffic management, to create more space for pedestrians and better waiting areas for bus passengers, and the requirement for development proposals to contribute towards connectivity and public realm improvements.  We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.	Comments noted. LP53 Parking, Servicing, and Car Free Development sets out the borough's residential and office car parking requirements.  Changes to the Clapham Junction and York Road/ Winstanley Regeneration Area Spatial Area Maps have been made.	The key on the Area Strategy maps has been amended to change "Crossrail 2 Safeguarding Area" to "Crossrail 2 Safeguarding Area (2015 Direction)".  "Crossrail 2 Area of Surface Interest" has been removed from the key.
Dr David	Lavender Hill for Me			1161	Policy PM4	PM4 Clapham Junction and York Road/Winstanley Regeneration Area	There are no plans to pedestrianize St John's Hill or Lavender Hill at this time.  Part I of the policy provides guidance for the provision of new public space/parklets rather than maintenance of existing public open spaces.	Reference added to pedestrian management proposals such as extended pedestrian priority areas to improve the pedestrian environment in and around the town centre.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Curran						<ul style="list-style-type: none"> <li>Placemaking point E: Action to reduce the impact of through-traffic in and around the town centre will be supported; particularly on and adjacent to Northcote Road. This will be achieved by introducing appropriate traffic calming and other traffic management proposals.– we suggest that this should also include Lavender Hill and St John's Hill, as heavily trafficked roads with exceptionally high pedestrian footfall. The recent streetscape interventions have been helpful, but this should remain an area of focus</li> <li>Placemaking Point I:We suggest that the option of enhancement of local / nearby parklet provision could also apply to the eastern side of the town centre, notably the existing underappreciated park at the junction of Elspeth Road and Lavender Hill(which could be significantly improved as part of any nearby development), and the wide pavement on the eastern side of this junction. The positive developments on Town Hall Road adjacent to Battersea Arts Centre could be cited as an exemplar of greening a relatively urban location.</li> <li>Placemaking Point K:We propose that the long view along Lavender Hill towards the cupola on the roof of Arding and Hobbs / Debenhams should be added to this list (our photo below to illustrate). It is a well-known view and one that is widely recognised as a local landmark (and even if we recognise that this view is not under immediate threat, it is worth noting that the proposals for redevelopment of the Debenhams site were amended during the consultation process specifically in order to protect this view).</li> <li>Placemaking Point L:We believe the expectation that proposals should reinstate traditional shop fronts to achieve consistency in appearance with the setting of the town centre should also apply to Lavender Hill, given the prominence of the large sweep of Victorian buildings running up the hill from Falcon Road(where some refurbishments such as 252 Lavender Hill have indeed taken this approach and have notably improved the streetscape), and where there is also continued scope for improved street setting in the Victorian parade east of the central library. The same applies to St John's Hill, where a particularly run-down parade opposite the Brighton Yard station entrance is gradually being improved by reinstatement of Victorian-proportioned shopfronts.</li> <li>Smart Growth Point C:We are not convinced that preventing amalgamation of retail units on Lavender Hill is beneficial ("The amalgamation of small units to create larger units will not be supported in this location").Two of the most successful recent developments were amalgamations –specifically the enlarged Party Superstore at 268-274 Lavender Hill (where four units combined to create a workable but affordable store for a local independent trader), and Whole Foods Market at 305-311 Lavender Hill(where an additional unit was amalgamated to create a significantly improved retail offer). We consider that Lavender Hill still suffers from units that tend to be too small for modern uses, and that the town centre as a whole still lacks sufficient 'mid-size' units while having a healthy supply of small units; on Lavender Hill our own evidence also suggests that the smaller the unit, the harder it is to let. Some degree of amalgamation ensures that the premises can stay relevant to modern retail and leisure uses; we consider the risk of displacement of 'major' retailers from St John's Road is minimal and that therefore preventing reasonable adjustment of units is unnecessary, and propose that this requirement should not be applied. We note that the Pavilion Chambers parade at 281-297 Lavender Hill is also specifically designed to allow units to be combined and separated at will, with only lightweight internal partitions.</li> </ul> <p>Wider point: Map 2.2 refers to spatial strategy area linkages along Lavender Hill (illustrated below). Few further details are provided –we suggest that the strategy acknowledge that these generally busy and well-connected linkages between close economic activity areas function in some regards as extensions of the town centres, and in some respects that town centres function as unified –and that in some cases this can justify the application of town centre uses and requirements along these key linkages</p>	<p>The valued views and vistas have been identified as part of the Urban Design Study, which is an evidence base study. The identified views are considered appropriate.</p> <p>It is agreed that the expectation that proposals reinstate traditional shop fronts should also apply to Lavender Hill and St John's Hill.</p> <p>It is agreed that the policy requirement to prevent the amalgamation of units - required to help provide greater affordability for smaller businesses in centres - does appear to be contrary to market ambitions for Lavender Hill, including for the retail units cited. As such, the policy should be revised to clarify that this only applies to Northcote Road, which carries forward the adopted policy approach under DMTS10 (Northcote Road Area of Special Shopping Character) and is considered to help protect the independent traders in that location. It is further noted that the Council have accepted suggestions to redesignate some frontages in this location to core (reflecting changes such as the Whole Foods development).</p> <p>It is recognised that certain town function uses extend in linear fashion between the borough's main and local centres (e.g. along Lavender Hill). The linkages shown on the map seek to reflect this reality, as well as likely flows of people and activity. That notwithstanding, the policy approach for town centre uses (LP45 Development in Centres) seeks to protect the core of these areas, setting out a sequential approach that subsequently directs town centre uses to 'edge-of-centre' sites, which are likely to be in these locations. This is considered consistent with the comments made in the representation.</p>	<p>Reference added to creating more space for pedestrians on St John's Hill and Lavender Hill in Policy PM4 C3. Part L of policy PM4 has been amended.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP	1254	Policy PM4	<p><b>See attachment on comment 1250 for the full representation for context and images.</b></p> <p>EMERGING POLICY PM4: CLAPHAM JUNCTION AND YORK ROAD/WINSTANLEY REGENERATION AREA</p> <p>Emerging Policy PM4 provides guidance on how sustainable development will be delivered within the Clapham Junction and York/Winstanley Regeneration Area with a focus on Place-making, Smart Growth and People First.</p> <p>We suggest that the relevant parts of Policy PM4 are re-worded. Our additional wording is set out in red below:</p> <ol style="list-style-type: none"> <li>1. Clapham Junction, a nascent Opportunity Area, has the potential to promote and encourage sustainable development. Development, at identified growth locations, will be supported where:</li> <li>2. mixed use is proposed with an emphasis on residential, commercial development and town centre uses;</li> <li>3. height and massing are appropriate and conform to the approach for tall buildings; <u>[See suggested wording above in relation to tall building approach].</u></li> <li>4. active travel is promoted and challenges for broader connectivity are addressed that help improve safety and make routes direct and attractive to Clapham Junction;</li> <li>5. public transport interchange is facilitated and promoted;</li> <li>6. heritage and landmark buildings are incorporated into development proposals to enhance their contribution to place identity;</li> <li>7. views and vistas, established in the Urban Design Study (2020), are respected and or enhanced;</li> <li>8. public realm and open space provision, accessible to all, complements the hierarchy within the Area Strategy;</li> <li>9. high quality green features will be incorporated into new developments to help connected green and blue infrastructure throughout the borough; and</li> <li>10. infrastructure can take advantage of district heating, sustainable urban drainage and digital connectivity.</li> <li>11. New development will be expected to <del>protect</del> <u>conserve or enhance the defining qualities / special characteristics of</u> important views and vistas in the area <u>as identified in the Urban Design Study, including comprising:</u> <ol style="list-style-type: none"> <li>1.vistas across mature open green spaces;</li> <li>2. <del>including the unfolding the experience of arrival at Clapham Junction</del> <u>view of Clapham Junction from the railway from Waterloo, with the view of the towers in the Clapham Grand signalling arrival at the town centre from</u> at the station;</li> <li>3. north along Northcote Road to the Northcote Road Baptist Church;</li> <li>4. from the railway bridge in St John's Hill to the buildings stepping up Lavender Hill indicating the valley of Falcon Brook;</li> <li>5. to the landmark St Mark's Church (within Wandsworth Common character area) from Battersea Rise looking west, and from the railway; and</li> <li>6. from the overbridge at Clapham Junction station towards central London landmarks including Battersea Power Station, the London Eye and the Palace of Westminster World Heritage Site.</li> <li>7. Development must be sensitive to local character, <del>by maintaining and respecting including</del> <u>including</u> proportions, scale and coherence of terraced streets, shop frontages and their settings. Where possible, the Council will expect proposals to reinstate traditional shop fronts to achieve consistency in appearance with the setting of the town centre and the conservation area; particularly for St John's Road and Northcote Road.</li> </ol> </li> </ol> <p>Part K of the policy states that new development will be expected to protect important views and vistas in the area however we would expect the Plan to outline why these views are considered to be important. We note that the views</p>	<p>Comments noted.</p> <p>It is acknowledged that Policy PM4 A1 requires further amplification and amendments are proposed.</p> <p>The Urban Design Study identifies important local views and vistas which should be taken into account in development proposals.</p>	Amendments made to Policy PM4.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>are described as 'valued' at pg. 82 of the UDS but this document has not been consulted on, nor are photographs of the views provided. Our Client would request that further clarity is provided within the Plan to set out the defining characteristics of important views and vistas so that new development can have regard to these.</p> <p>Park K of emerging policy PM4 should also acknowledge that visual amenity can be improved through development.</p>		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1519	Policy PM4	<p>PM4 Clapham Junction and York Road/Winstanley Regeneration Area We note that Clapham Junction is an emerging Opportunity Area and is initially expected to provide at least 1,714 homes by 2037/38 ('Smart Growth' Clause A). Further growth is dependent on Crossrail 2 and development to upgrade the station. The area is designated as an Opportunity Area in the London Plan. The York Road/Winstanley Regeneration Area is a key site. Paragraph 6.7 refers to the provision of up to 2,550 new homes. Policy PM4 does not refer to the need for social infrastructure, including healthcare, but site allocation CJ5 refers to the potential for health use. The permitted scheme for the York Road/Winstanley area(ref 2019/0024)includes the provision of a health centre. The intention is that this will replace the existing GP practice Clapham Junction Medical Practice following the demolition of Farrar House. Discussions between the CCG and the Council are underway to look at options for primary care provision on the site and in the wider area.</p>	<p>Noted. LP17.A.7 states that where a development proposal would generate a site-specific impact, the Council will expect the impact to be mitigated on-site or through the provision of financial contributions in accordance with the Council's Planning Obligations SPD; and supporting the provision of necessary health and emergency services facilities in appropriate locations.</p>	Wording added to LP17 to reflect comment.
Cyril Richert	Clapham Junction Action Group			1666	Policy PM4	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>PM4 Clapham Junction and York Road/Winstanley Regeneration Area page 116</p> <p>Tall buildings in Clapham Junction and York Road / Winstanley Regeneration Area will be supported where they are in locations identified as appropriate for tall buildings in Appendix 2, subject to addressing the requirements of Policy LP 4 (Tall Buildings).</p> <p>Once again, the planners are ignoring the cumulative effect of developments. There is not mention of that effect and it must be added.</p> <p>Facts show that the cumulative effect of developments is not taken into account at a sufficient level by the Council and therefore can create more middle term misery for the area</p> <p>In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we responded that "responded that cumulative impacts of developments are not taken into account at a sufficient level by the Council." The planners responded that "The application of planning policy takes a holistic approach to the assessment of all development proposals." 29 . Unfortunately, this is not the case and is actually confirmed by proposed policy LP45 saying "each proposal considered on its merits".</p> <p>Although Clapham Junction is marked with excellent PTAL, the planners have acknowledged earlier that the station is already at capacity – without even taking into account ongoing future constructions.</p> <p>Therefore, the PTAL criteria should not be the consideration for increasing density.</p> <p>We suggest additional policy criteria being:</p> <p>"Density and tall building cumulative impact will be assessed when considering further development for the Clapham Junction area."</p> <p>Office space</p>	<p>In accordance with policy LP4, tall buildings will not be supported if they result in any adverse visual, functional, environmental or cumulative impacts.</p> <p>It is acknowledging that Clapham Junction offers potential for office development and the plan has been amended to reflect this. The plan supports proposals which protect and enhance existing retail capacity whilst promoting a range of town centre uses to ensure the viability and vitality of the town centre</p> <p>The housing capacity figure has been included in error and has been corrected.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address. The masterplan for the York Road/Winstanley regeneration Area has been prepared in collaboration with the community.</p>	Revise the housing capacity figure in policy PM4. The potential for office development has been further amplified.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>PM4 – E p117 - New office provision will be supported as part of the mixed-use redevelopment of growth sites</p> <p>We consider that the plan is focusing on increase of housing provision and underestimate the demand for office space, which implies a lack of ambition on promoting Clapham Junction as a place for offices. For example, the draft Local Plan says: "Proposals should re-provide at least the existing quantum of office floorspace".</p> <p>PM4 - Smart Growth – E: We consider that there is additional detail to promote Office Space in Clapham Junction et we suggest the it should be reinforced.</p> <p>The recent approved development for Arding &amp; Hobbs should be mentioned. We support comments from LavenderHillForMe31:</p> <p>Placemaking Point K: We propose that the long view along Lavender Hill towards the cupola on the roof of Arding and Hobbs / Debenhams should be added to this list (our photo below to illustrate). It is a well-known view and one that is widely recognised as a local landmark (and even if we recognise that this view is not under immediate threat, it is worth noting that the proposals for redevelopment of the Debenhams site were amended during the consultation process specifically in order to protect this view).</p> <p>PM4 Clapham Junction and York Road/Winstanley Regeneration Area - Smart Growth p117</p> <p>Development in this area is expected to provide at least 1,714 homes by 2037/38. [...] Winstanley and York Road regeneration will contribute to meeting this objective by delivering up to 2,550 homes.</p> <p>There is a contradiction with the total 1714 figure in Clapham Junction and York Road/Winstanley Regeneration Area and the 2550 only for York Road/Winstanley Regeneration Area. It needs to be corrected. The forecast assumed by the planners for 2037/38 might be 2550 + 1714 = 4264.</p> <p>P117 Suggested: "Development in this area is expected to provide at least 4,714 4,264 homes by 2037/38"</p> <p>PM4 Clapham Junction and York Road/Winstanley Regeneration Area - Smart Growth p117</p> <p>Proposals for larger retail provision should be prioritised in the Core Frontages, focused around Clapham Junction Station and on St John's Road.</p> <p>The Council has just granted permission for the opposite: Proposal (p.a. 2020/3421) made by W.RE (W. Real Estate limited), to redevelop Arding &amp; Hobbs building at Clapham Junction, has been approved by Wandsworth Council. It includes a drastic reduction of the retail floorspace – from five full floors, to just part of the ground and basement.</p> <p>You will note that Societies and Community groups objected against that sheer reduction of large retail space, but the Council decided to dismiss the concern.</p> <p>PM4 Clapham Junction and York Road/Winstanley Regeneration Area - People First p117</p> <p>York Road/Winstanley Regeneration Area is the subject of an agreed master plan prepared in collaboration with the community.</p> <p>This is a lie, and should be retracted from the local plan (CJAG has already made the same comment countless times).</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						P117 Suggested: " York Road/Winstanley Regeneration Area is the subject of an agreed master plan prepared in collaboration with the community by Wandsworth Council."		
Katie Brown	Development Planning Manager Network Rail			1735	Policy PM4	<p>See attachments on comment 1734</p> <p><u>PM4 Clapham Junction and York Road/ Winstanley Regeneration Area</u></p> <p>Taking into consideration the strategy for Clapham Junction Station, Network Rail welcomes and supports Policy PM4, especially Placemaking point C that stations:</p> <p>'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.'</p> <p>Further to Placemaking point C, point D states that the Council will 'promote the development of a new public square and entrance to Clapham Junction station'. Network Rail are very supportive of the commitment to promoting the improvement of the public realm at the station and we would therefore welcome further conversations on how this can be realized within the period the Local Plan covers (2023-2038), especially with regards to the area identified as site allocation 'CJ2 Clapham Junction Station Approach, SW11'.</p> <p>It must be noted that there are some concerns with Placemaking point's F and G in relation to appropriate locations for tall buildings as expanded on in the next paragraph.</p>	Comments noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			762	Statement Anchor for Change - Clapham Junction Transport Interchange 1	<p>Opportunities and Constraints</p> <p>The area is identified in the London Plan as a nascent Opportunity Area, reflecting the significant growth opportunities offered by Crossrail 2 and/or the proposals for a major rebuilding of the railway station. These opportunities are closely linked: it is unlikely that the existing station will be redeveloped without provision for a new Crossrail 2 station.</p> <p>However, since the Government has recently directed TfL to cease all work on Crossrail 2 beyond protecting its designated sites, it is highly unlikely that any major development other than the York Road/Winstanley regeneration project will take place within the lifetime of the Plan. The site allocations for the town centre represent merely a wish list with little chance of fulfilment during the foreseeable future. The same can be said of policies such as facilitating and promoting a better public transport interchange.</p> <p>This presents a major dilemma for the Council, the local community and other stakeholders. No-one wants to see stasis and planning blight for the next fifteen years. The Plan talks of working with Network Rail and TfL to produce a "Vision" for the Junction. But the opportunities for development in the town centre to take place during the lifetime of the Plan are highly constrained. This is symptomatic of other objectives throughout the Plan which lack any timescale. Timings might provide some confidence that objectives are realistic and achievable within the lifetime of the Plan.</p> <p>What is needed is for the strategy to include some realistic suggestions for the lifetime of this plan to ensure that Clapham Junction is sustained as a successful centre, and that it responds effectively to changes in consumers' and visitors' behaviour. The absence of the kinds of innovative thinking being discussed by landowners and developers, community groups and policy makers across London and across the country is disappointing</p>	Comments noted. The position regarding Crossrail 2 has been updated in the Local Plan. The Council wishes to work with stakeholders and the local community in bringing forward development proposals within the plan period and is to lead the preparation of a masterplan for the station and adjoining site allocations to ensure development and infrastructure provision and investment in the area takes place in a planned way.	Area Strategy amended to provide further amplification on the masterplanning process. Site allocations to be considered in the context of the masterplan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Appropriate measures might include: developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management; and the development of arts and cultural uses, such as a cinema. These and other initiatives are essential if the Council is to work effectively with others in reimagining what the future of the town centre might be. Working together with landowners, developers and others will be the more important as a result of the introduction of class E, and if extensions to PDRs reduce the protection for high street premises.</p> <p>All four of the site allocations around the station are themselves constrained by the need to protect the as-yet unknown possibilities for future rebuilding of the station itself and reconfiguration of the tracks surrounding it. In these circumstances, landowners and investors are unlikely to be attracted to invest significant sums on developments in the three site allocation areas.</p> <p>Offices</p> <p>Prima facie, one might expect that the excellent transport links would make the area suitable for significant office development. But experience to date suggests that this might not be the case. Of the two significant office buildings in the town centre, the PCS building has not been fully let for some years, and the first to the fourth floors of the Barclays Bank building, contrary to what is stated in the Plan, have been converted into flats, following prior approval given by the Council in 2017.</p>		
	Imperial College London	Charlotte Orrell	Senior Futures Consultant Iceni Projects	1236	Statement Anchor for Change - Clapham Junction Transport Interchange 1	<p><b>1. Area Strategy for Clapham Junction &amp; Griffon Studios Site</b></p> <p>Imperial have a long-term interest over the Griffon Studios site, located on Winstanley Road in Clapham junction.</p> <p>Imperial are strongly supportive of the strategic aims for the Clapham Junction area. Imperial acknowledge the importance of building upon Clapham Junction Station's significance as a major transport interchange and as an 'anchor for change' for the wider area. Specifically, Imperial support the boroughs vision to:</p> <ul style="list-style-type: none"> <li>Promote the area surrounding Clapham Junction Station as a 'growth location'.</li> <li>Encourage mixed-use development on sites outside of Site Allocations and in close proximity to Clapham Junction Station which can aid in delivering more homes, commercial space and continue to build on its cultural, leisure and entertainment offering.</li> <li>Utilise the areas highly accessible location to accommodate higher density development, including tall buildings.</li> <li>To ensure more is done in terms of connectivity, with particular regard to the existing division between the north and the south of Clapham Junction, created by the existing railway line.</li> <li>To vastly improve the public realm and streetscape to the north of Clapham Junction Station, particularly between the station and leading to the York Road / Winstanley Estate.</li> <li>To incorporate high quality green features to help connect green and blue infrastructure within the area.</li> <li>Upgrade Clapham Junction Station and to better integrate the station with the town centre and the York Road / Winstanley Estate</li> </ul> <p>The Griffon Studios site lies amongst a number of Site Allocations, specifically that of the Winstanley / York Road Regeneration Area (Ref. CJ5) and the allocated land on the corner of Grant Road and Falcon Road (Ref. CJ3). Both sites are acknowledged for their ability to provide mixed use development, which can be delivered by a range of tall buildings. Development within the CJ5 allocation has commenced, including a 20-storey residential-led mixed use building directly opposite the Griffon Studios site and</p>	Comments noted. The site is considered to not require an allocation. See the Site Allocations Methodology Report.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>the delivery of the Winstanley / York Road Estate regeneration is already underway. Significantly, both allocations also highlight the importance of improving accessibility and movements between both sites and to the northern entrance of Clapham Junction station. As a result of this a proposed new route to the eastern boundary of the Griffon Studios site is proposed. Imperial are supportive of the proposed route in principle, subject to:</p> <ul style="list-style-type: none"> <li>• The access meeting secure by design guidance;</li> <li>• Acknowledges existing security concerns in the area,</li> <li>• Is located outside of the Griffon Studios site boundary, and</li> </ul> <p>Does not have an impact on the private amenity space at Griffon Studios.</p>		



## Chapter 7 - Area Strategy for Putney

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			362	7.1	Supported, but see the comments against paras 2.11 & 2.95	Comment noted.	No change to the Local Plan required as a result of this representation.
Mrs Heather Graham				434	7.1	Putney School of Art is unique in being an originally purpose-built art school. It is currently thriving and well supported (in spite of the pandemic) in terms of attendance by many within the borough as well as many beyond the borough. It hasn't been mentioned in this section, but it should be regarded as something of a jewel in the Putney landscape.	The Arts and Culture Strategy identifies and highlights Putney School of Art and Design (PSAD), managed by Enable Leisure and Culture. The text within Putney Area strategy will be updated to reflect the importance of the Putney School of Art.	Wording to be added to the text within Putney Area Strategy to refer to Putney School of Art as a result of the comment.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1293	7.1	7 Area Strategy for Putney We would like to make the following suggestions:  - A clearer plan on how to encourage retailers back to Putney.  - More explicit height restriction on Putney high street to combat air pollution due to the canyon effect.	<p>The Retail Needs Assessment (2020) has indicated that there is potential for additional convenience shopping and food and beverage offer within Putney by 2035, and the Local Plan therefore continues to promote Core Frontages, where a concentrated retail offer (including in the Putney Exchange) will help to provide a critical mass. That notwithstanding, the longer-term decline of bricks of mortar retail has been well observed, and is likely to have been accelerated as a result of the pandemic. The Local Plan allows for a greater flexibility of uses that can be located within designated frontages (Core and Secondary), no longer setting thresholds on retail units. This reflect the increased trend for leisure uses, such as food and beverages, as part of the make up of the high street. Other uses that present an active frontage, such as co-working spaces, are also permitted in these locations.</p> <p>The Area Strategy also recognises the increasingly important role of placemaking in defining the success of a particular centre relative to others, and therefore seeks to build one of the key attractions of Putney - the riverside location - by enhancing the connection between this area, a successful leisure attraction, and the retail and town centre function of the High Street, ensuring that these work as a cohesive unit rather than distinct places.</p> <p>PM5, Placemaking 3 states that proposals for upward extensions along Putney High Street will be supported where the extension would be subordinate to the host building. Policy LP14 seeks to ensure that 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 the emerging London Plan Policy SI 1. Development proposals which lead to a canyoning effect will not be supported. Furthermore, changes have been made to policies LP1 and PM5 to ensure that development proposals avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene.</p>	Policies LP1 and PM5 have been expanded to include an additional reference to canyon-like effect.
Michael Atkins	Senior Planning Officer Port of London Authority			1455	7.1	<b>See the attachment on comment 1441 the representation for context</b>  6. Area Strategy for Putney  Welcome the references to the areas extensive frontage along the River Thames, which is within the Putney Embankment Conservation Area and contains a number of boathouses, boat clubs and chandlers' premises at Putney Embankment. Support the proposed vision for the area to provide inclusive and well-connected new public open spaces and enhance the links between the High Street and the riverside here.	Support noted.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				103	7.2	This section should capture the fact that Putney is informed by the fact that it is at a major N/S and E/W transport and transit routes and has been since Roman times. These provide important connectivity beyond Putney to all points of the compass. This fluidity, particularly the road network but also rail, is part of the reason many people chose to live here. This accessibility being a core part of what Putney is should not be underplayed.	The context section of the Area Strategy says that Putney developed due to its important role as a river crossing and emphasises the importance of accessibility.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Mark Poulter				148	7.2	Putney High Street must not be closed to through traffic.	Comment noted. The Area Strategy for Putney does not propose to close Putney High Street to through traffic.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			363	7.2	This section should capture the fact that Putney is at a crossing of major N/S and E/W transport and transit routes and has been since Roman times. These provide important connectivity beyond Putney to all points of the compass. This fluidity, particularly the road network but also rail, is part of the reason many people chose to live here. This accessibility being a core part of what Putney is should not be underplayed. Putney is not a village. Roads and connectivity beyond Putney is not emphasised in either 7.2 or 7.3.	The context section of the Area Strategy says that Putney developed due to its important role as a river crossing and emphasises the importance of accessibility. There is no evidence that accessibility to thorough traffic will have a positive impact on the vitality and viability of the area. The Area Strategy seeks to ensure that future development contributes to reducing noise pollution and traffic congestion and supports the health and wellbeing of communities.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				104	7.3	There are only two "large supermarkets" in Putney where a full/main shop could be achieved, not three. Private vehicle accessibility of these supermarkets must be maintained, or else shoppers will increasingly drive to supermarkets down the A3 and the scale of the Putney main supermarkets will become unviable for their operators.	This information was taken from the Retail Needs Assessment - Centre Health Checks (Appendix 3), and refers to the Sainsbury's, Lidl and Waitrose. It is agreed that these are better considered mid-size.	Amend reference in the identified paragraph to refer to mid-size supermarkets.
Mr Robert Arguile	Chair The Putney Society			364	7.3	Clearly the High Street isn't an attractive place to shop. Although there are three full range supermarkets again (Sainsbury's, Waitrose and Lidl), all are only mid-size.	The full range supermarkets should be referred to as mid-size, rather than large.	Amend reference in the identified paragraph to refer to mid-size supermarkets.
Mr Mark Poulter				105	7.4	The "numerous" retail <u>leisure</u> vantage points to view the Boat Race amount to just two pubs and one restaurant. Upstream of Putney bridge in the Conservation area there is no more scope for pubs, restaurants or bars.	Agreed. The sentence incorrectly conflates Putney's leisure offer and the vantage points afforded of the Boat Race. The Area Strategy map outlines that development upstream of the river should focus on sport and leisure recreational facilities, with restaurants and bars directed to the area downstream of Putney Bridge (also set out within PM 5), with the exception of a new possible riverside leisure use on the promontory located adjacent to Watermans Green that will be created by the Thames Tunnel project.	Amend paragraph to remove reference to the boat race, focusing instead on the existing leisure offer on Putney Embankment and downstream of Putney Bridge.
Mr Robert Arguile	Chair The Putney Society			365	7.4	Supported.  Employment uses are now at risk of change to residential through Permitted Development. How does the council intend to combat this?	The Council is considering proposals to take forward an Article 4 Direction to limit the extent of this PDR. It is noted, however, that the Government have consulted on proposed amendments in the NPPF for the use of Article 4 Directions, which would - if taken forward - seek to place greater restrictions on their implementation.	No change to the Local Plan required as a result of this representation.
Steve Fannon				893	7.4	Okay, so "Putney's thriving leisure offer" benefits from "the proximity of Roehampton University" yet Roehampton residents have challenges with students parking their cars on the Alton Estate, anti-social behaviour and challenging for capacity on the bus network on which Roehampton is so dependent?	Comment noted. This is not a planning policy matter.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				106	7.5	Putney <u>was</u> a successful local office centre. The loss of offices with high value occupants led to a reduction of custom to local retail businesses making some of them non-viable.	In the context of the borough, Putney remains an important local office centre, however it is recognised that this role has been significantly diminished in recent years (which is referred to in this paragraph). The paragraph should be amended to removed reference to 'successful', and the earlier paragraph on retail should identify the impact of the loss of offices on retail .	Amend this paragraph and the earlier paragraph on retail to reflect the impact of the loss of the offices. The paragraph should state that Putney is a local office centre, rather than a successful one to acknowledge historic trends.
Mr Robert Arguile	Chair The Putney Society			366	7.5	Shopkeepers will confirm that this loss of weekday footfall had already contributed to lost trade before the lockdown. Protection of employment space must go well beyond the two buildings included in the map to include all of the offices in the town centre.	The Area Strategy should recognise that the loss of offices have contributed to the decline in the centre's retail provision.  Under the current Article 4 Direction restricting the conversion of offices to residential (under PDR), all of Putney Town Centre is protected. This Direction will continue until July 2022, when it expires as a result of the introduction of Class E. The Council is considering proposals to take forward an future Article 4 Direction to limit the extent of the proposed PDR from Class E to C3 (dwelling houses). Under Class E, the change of use within the Class - for example from an office to a restaurant - does not constitute development, and therefore does not require planning permission. Where redevelopment of a site incorporating economic uses (such as offices) does seek planning permission, for example if works are required or additional floorspace is provided (including other uses), the full replacement of the economic use is required (see PM5).	Amend the paragraph on retail (7.3) to recognise the impact of the loss of office provision in the centre.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Mark Poulter				107	7.6	<p>Residents do not have a “daily active travel <b>requirement</b>”. There may be a “recommended level of daily active travel”.</p> <p>I’m sure some “consultancy” somewhere can come up with the algorithm that suggests that 5000 -10000 journeys a day could be converted to cycling but bluntly the number is totally ridiculous. Unfortunately, this sort of ridiculous number bends other decisions about how Putney should be changed to facilitate these imaginary cyclists. Santander Bikes taking up kerb space and little used. New blocks of flat obliged to have hundreds of bike racks barely used.</p> <p>Similarly, the idea of “mitigation” of east/west, north south traffic on the strategic/main roads may well support some increase active travel but destroy accessibility for many others and reduce the economy of the town further. Noting the pre Covid reduction of Putney’s retail offer.</p>	Comments noted. The Council has set as objectives for the Local Plan which include encouraging the growth of sustainable transport and reducing the need to travel. By helping create an environment that supports more active travel journeys these objectives can be met.	Supporting text, para 7.06, has been amended.
Mr Robert Arguile	Chair The Putney Society			367	7.6	<p>The Plan expresses a desire to encourage greater use of public transport and to reduce car usage, but it gives no evidence as to how this might be achieved. Passenger numbers at Putney railway station fell by 29% in the 5 years 2014/15 to 2019/20 and Network Rail (Feb 2021) predict that commuter levels will remain at 80% of pre-covid levels for the next 3 years.</p> <p>The Plan is also silent about increasing use of East Putney underground station. We recommend that the installation of lifts, partly funded through CIL from local developments [a policy that would be possible according to LP54 A2 on P360 ], would improve accessibility and raise passenger use.</p> <p>Putney High Street “remains a pollution hot spot”. Putney High Street N02 emissions in 2021 are still 25% above the EU mandatory limit. The Plan needs to set out concrete action and dates of when it will be <u>brought within the law</u>.</p> <p>’ The Local Implementation Plan shows that Putney has a medium level of residents meeting their daily active travel requirement’. Parking the car isn’t easy, but residents will only walk if it makes sense. That they don’t suggests it does not for a substantial proportion of the journeys they need.</p>	The Local Plan sets out how new development proposals should be considered. The Corporate Business Plan sets out ways in which the Council will directly encourage greater use of public transport and reduce car usage. The Council aims to work with TfL to make East Putney Tube station more accessible with less clutter, a new forecourt, appropriate new retail units and more cycle storage. As set out in the Wandsworth Regulation 123 list (a list of relevant infrastructure that it intends will be, or may be, wholly or partly funded by CIL) Strategic transport improvements including: Wandsworth One-way System, Improvements to National Rail and London Underground/Overground Stations are listed as potential sources of expenditure.	No change to the Local Plan required as a result of this representation.
Paul Dolan				518	7.6	The greatest improvement we can make to the health of those in Putney and the retail health of Putney High Street is to reduce the traffic on the High Street, discouraging journeys and seeking other forms of alternative transport. With the increase in Electric Cars this will mitigate some of the NO2 and particulates however brake dust within Electric or Fossil fuel ICE cars will still be a problem only solved by a reduction in overall traffic.	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr Nick Symons				10	7.7	Putney High Street is a major through route into London and all the improvements in place such as ULEZ will mitigate traffic fumes, but nothing should stop the freedom of motorists to drive through Putney,	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			368	7.8	The High Street does not connect to and needs to be made to work without the riverside.	The Area Strategy recognises that there are opportunities to enhance the connectivity between the High Street and the riverside. It seeks to improve accessibility to the Wandsworth’s Riverside, and to create a pleasant entrance threshold to Putney High Street from the bridge.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				138	7.9	<p>Why add the words “including pedestrians and cyclists”, surely all the users of the townscape are pedestrians? What others are there?</p> <p>We no longer have narrow pavements on most of the High Street.</p>	<p>Comment noted. Pedestrians are not the only users of Putney High Street, the latter of which is also used by cyclists. Consequently, heavy traffic diminishes the quality of the townscape for cyclists.</p> <p>The Area Strategy had been drafted prior to the widening of pavements, which occurred in the last few months. The supporting text of the Area Strategy has been revised accordingly.</p>	Amend supporting text of the Area Strategy
Mr Robert Arguile	Chair The Putney Society			370	7.9	We disagree that the Exchange (consented by the Council) is disproportionately scaled.	Comment noted.	Amend supporting text of the Area Strategy

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Nick Symons				11	7.10	The river frontage including the Boat House area round the Church and the boat houses on the embankment is viewed as the centre of Putney by many. Leave the High Street alone. You have already widened the pavements. Stop trying to make the High Street into something it can never been. It is a major arterial route as well as having shops in it. The Putney Exchange actually allows for larger shops not to swamp the High Street. Totally disagree with the premise. Bring back civic space behind the Exchange by Coat & Badge where market used to be.	<p>The Area Strategy had been drafted prior to the widening of pavements, which occurred in the last few months. The supporting text of the Area Strategy has been revised accordingly.</p> <p>The context section of the Area Strategy says that Putney developed due to its important role as a river crossing and emphasises the importance of accessibility. There is no evidence that accessibility to through traffic will have a positive impact on the vitality and viability of the area. The Area Strategy seeks to ensure that future development contributes to reducing noise pollution and traffic congestion and supports the health and wellbeing of communities.</p> <p>The Retail Needs Assessment (2020) has indicated that there is potential for additional convenience shopping and a food and beverage offer by 2035, and the Local Plan therefore recognises the current and future role of the High Street. The Area Strategy seeks to enhance the connection between the riverside, a successful leisure attraction, and the retail and town centre function of the High Street, ensuring that these work as a cohesive unit rather than distinct places. Policies set out within Chapter 19 (Borough's Centres) now permit a greater flexibility of use within the borough's Core Frontages, such as Putney High Street, supporting the diversification of these areas, and reinforcing the role of the Putney Exchange for accommodating larger-format comparison retail.</p> <p>The Wereldhave site, 56-66 Putney High Street, is included as a site allocation, and any forthcoming development at this location will be required to provide a substantial new public square at street level.</p>	Amend supporting text of the Area Strategy
Mr Robert Arguile	Chair The Putney Society			369	7.10	The 15-minute neighbourhood might be true close to the High Street, but not in West Putney, either side of West Hill etc. See Map 19.2, p.347.	The Area Strategy focuses on Putney Town Centre and adjacent areas rather than the whole 'Putney place', as defined in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Mrs Sue Rolfe	Werter Road Residents			95	7.12	<p>Relating to 7. Objectives (Social), 7.12 Vision, LP15 Health &amp; Wellbeing, Healthy Streets 20.13/4/25</p> <p>The current consultation draft uses many arguments supported by the document: Transport for London 10 Indicators of Healthy Streets 2017. However, this was followed by a more substantial government document Healthy High Streets: Good Place-making in an urban setting 24 Jan 2018 by Public Health England and Institute of Health Equity. Although similar, the latter document appears to be the only one which contains references to crime and personal safety. The Wandsworth Local Plan based on the former document appears not to include these references. The government one is far more comprehensive and based on sound Public Health evidence.</p> <p>The TFL document includes (Crime &amp; Fear of Crime/Older People 1.3E) indicators such as that 'people feel safe' and 'people feel relaxed'. The government document refers to the detrimental effect on high streets of alcohol outlets and betting shops. It also alludes to 'crime and fear of crime' as being attributable to 'poorer areas'. This is clearly no longer the case in Putney where we have experienced an increasing level of crime and muggings in residential streets such as Norroy Rd.</p> <p>The government document in reference to Older People states:</p> <p>'Personal concern among older people can act as a deterrent to walking and using public transport in neighbourhoods particularly at night. Conditions of pavements can also act as a barrier to older people being socially connected, remaining physically active and accessing essential goods and services. This may exacerbate social isolation.'</p> <p>Relating to 'crime and safety' all residents need to feel that they can access their homes in safety and if they are car owners that they can park near their own homes. If they are pedestrians, that they can access their homes without fear of muggings.</p>	<p>The Local Plan does not set out that it supports either document over the other and all are considered in the preparation of these policies and would be considered by development management officers to relevant proposals. LP51 also sets out that proposals will be supported where neighbourhood environments are made safer, including reducing road danger and improving personal security (see Policy LP 15 Health and Wellbeing).</p> <p>Policy LP1 establishes that development proposals must reflect and demonstrate that they minimise opportunities for crime and antisocial behaviour based on an understanding of the locality and the potential for crime and safety issues. This applies across the borough.</p> <p>The administration of parking permits in existing CPZ is outside the remit of the Local Plan as is the allocation of funding for improvements pavement conditions.</p> <p>Policy LP 51 also sets out that the Council will work to promote safe, sustainable and accessible transport solutions for all users. This includes elderly and people with disabilities. The policy also expects development proposals, including for a change of use, to be people focused and meet the Healthy Streets objectives which put human health and wellbeing at the centre of transport planning, especially by providing for walking and cycling. The policy also promotes considering widening pavement projects to improve access on foot or by bicycle along with the individual street or junction proposals.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>In these days of lockdown, it would be invidious to judge conditions as the same as they might be out of lockdown. The homeless for instance are not as visible at present. Anti-social behaviour such as loitering, accosting passers- by or using local gardens and amenities as toilets is less rife. There has however not been a reduction of crime – whether scooter thieves or other muggings.</p> <p>Older people (not disabled) should reasonably be able to park near their homes – where they have paid for a parking permit. In the current pandemic many have not dared to travel by public transport. There is no evidence that pandemics will not happen in the future. Older people need their cars to feel safe.</p> <p>Civic spaces in the immediate vicinity of Putney High Street may have some appeal during daytime, albeit next to a busy route. They have, however, as local residents will confirm, proved to be the gathering points for less social elements, particularly during the evening, becoming threatening to passers- by, the older, infirm and women. The parklet in Montserrat Road became such an issue in terms of its lack of cleanliness and use by street drinkers that at the 11 November Safer Neighbourhood meeting it was agreed to remove it since it was wasting valuable police and ambulance time.</p> <p>We would like to see these evidence-based sections included in the Local Plan, as well as a fairer strategy for all road users, so that action can be taken to actively redress issues of crime and personal safety. Widening pavements and making provision for the excellent delivery/shared space for Tesco is great, but before allocating monies on other 'improvements' could we not put 'improve condition of pavements' top of the list! Cf pavement design p.50 in PH document – tarmac safer surface.</p>		
Mr Robert Arguile	Chair The Putney Society			371	7.12	We support the all aims in the Vision outlined in paragraph 7.12. However, we have concerns that the actions set out in the Plan will do little to achieve these ambitions.	There is no evidence to indicate that the actions set out in the Plan will not be achieved. Policy PM1 makes it clear that compliance with the Area Strategies and Site Allocations is a key feature for the successful delivery of this plan.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			713	7.13	<p>TfL welcomes the proposal for the site to provide much needed bus terminating and standing facilities (which should include drivers' facilities as part of any redevelopment). Early dialogue with TfL is advised to ensure that any provision meets operational needs.</p> <p>However, the suggested provision of car parking is not justified because the area is already congested, with high levels of pollutants generated by traffic. Parking would take up additional, valuable development space and there are other parking alternatives nearby. Any development should be car free to take advantage of the high PTAL and the opportunities for active travel. In this context, local cycle route improvements would be welcomed.</p>	Comments noted. Existing parking is not required to be removed. LP53 Parking, Servicing and Car Free Development sets out the Council's position on parking.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			374	7.14	(Wereldhave sold this many years ago) This site already has planning consent and enough work has been done to constitute a start. Cycle routes are already OK thanks to traffic gates. We are surprised given the Plan's desire to improve local air quality that it proposes additional parking space here within central Putney. This site is immediately across the road from the car park entrance to Putney Exchange, whose parking is never full.	Comments noted. Existing parking is not required to be removed. LP53 Parking, Servicing and Car Free Development sets out the Council's position on parking.	No change to the Local Plan required as a result of this representation.
Paul Dolan				524	7.19	We should not be incorporating a terminal for bus routes on the high street. Given the recently reduced width of the high street all transport whether public or private should be encouraged to keep moving. Servicing of shops are to be done to the rear only or outside peak hours which now runs from 0700-1100 and 1400-2000.	The Local Plan sets out how new development proposals should be considered. The Corporate Business Plan sets out ways in which the Council will directly encourage greater use of public transport and reduce car usage.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			375	7.24	Redevelopment here is very unlikely. 'extend Putney Wharf space in to site' is only valid if this leads somewhere. The chances of connecting this with PUT3 and PUT4 are vanishingly small and the footprint of the Putney Wharf Tower blocks access. It is more important to keep a cinema as part of the cultural offer. We note and agree with the de-designation of the 'Putney Wharf Focal Point of Activity' (which included site PUT2) as an Economic Use Protection Area (2.6.1, p.15 of the policies Map changes document) to allow this to be treated as part of the Town Centre.	<p>Comments noted. The Council regards the site as having development potential and it has included it as a site allocation to ensure its development and design is in line with the vision for Putney. The Site Allocation requires the re-provision and enhancement of the entertainment use, ensuring that the cultural offer provided by this site is not diminished or removed.</p> <p>Existing public spaces near the Putney Wharf development are already relatively well connected. Site Allocation PUT2 seeks to ensure that future development extends the existing public space. The Site Allocation makes is clear that</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							landowners will be required to cooperate with other allocated sites to ensure that future development proposals connect the suggested northern entrance of Corner of Putney Bridge Road and Putney High Street (PUT3) with the new southern link.  Support for the de-designation of the Putney Wharf Focal Point of Activity noted.	
Mr Robert Linton				624	7.24	For the attention of the Planning Policy Department  As a resident of Deodar Road, I strongly object to the Draft Local Plan proposing high rise buildings at the western end of Putney Bridge Road. Any high-rise buildings to the east of areas PUT 2 and PUT 3 would be unacceptable for several reasons.  For the western end of Deodar Road, they would cast shadow as well as adversely impact on privacy. They would also damage the historic nature of the immediate vicinity with its Almshouses and Conservation Area. Putney Bridge Road is already very severely congested for many hours of the day and high rise buildings would only further contribute to this as well as impairing the dispersion of traffic fumes and particulates. Furthermore, they would add significantly to the existing parking difficulties.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	Changes made to policy LP4
Josephine Vos	Transport for London			714	7.24	Any development on these sites should be car free and existing parking should not be replaced to take advantage of the high PTAL and the opportunities for active travel.	See LP53 Parking, Servicing and Car Free Development for information regarding parking requirements for developments in high PTAL areas.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			216	7.30	walking and cycling	Comment noted.	Amended.
Mr Robert Arguile	Chair The Putney Society			376	7.35	We agree it is desirable that owners collaborate, but to achieve this need more from the council than just wishing it so.	Comment noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			715	7.35	Any development on these sites should be car free and existing parking should not be replaced to take advantage of the high PTAL and the opportunities for active travel.	See LP53 Parking, Servicing and Car Free Development for information regarding parking requirements for developments in high PTAL areas.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			217	7.46	"walking and cycling" link	Comment noted.	Amended.
	Wandsworth Cycling (London Cycling Campaign)			218	7.47	replace "pedestrian" with "walking and cycling"	Comment noted.	Amended.
Paul Dolan				538	7.49	Burstock Residents Association and Deodar/Florian/Merivale Residents Association disagree with regard to the appropriateness of granting permission to developments that are "tall" those being 6 or more storeys. The streetscape and new building such as the Metro Building on the High Street are examples of modest heights that respect the street scape of the High Street and fit with the general vernacular of Putney which is of Victorian Brick built houses of no more than 3 storeys.  The failure of past planners to stop high rise such as the repurposed Tall buildings such as those on Upper Richmond Road and the Reclad ICL building on Putney Bridge should not make a precedent for future isolated site specific new developments.	The application of policies is a Development Management issue rather than a matter for the Local Plan to address.  The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Mr	Chair			377	7.50	Increasing internet usage and the sheer quantity of cables leading to Montserrat Road means that redevelopment of this site is extremely unlikely.	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Robert Arguile	The Putney Society							
Josephine Vos	Transport for London			716	7.50	Any development on these sites should be car free and existing parking should not be replaced to take advantage of the high PTAL and the opportunities for active travel.	See LP53 Parking, Servicing and Car Free Development for information regarding parking requirements for developments in high PTAL areas.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			378	7.59	Putney needs this shop. There are almost no other sizable floorplates. Any building above 3 to 4 storeys on this site will have a significant detrimental impact on surrounding residential.	The site allocation requires new development to provide retail floorspace as part of this development. It is not within the control of planning policy to require the replacement of the supermarket.  The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			717	7.59	Any development on these sites should be car free and existing parking should not be replaced to take advantage of the high PTAL and the opportunities for active travel.	See LP53 Parking, Servicing and Car Free Development for information regarding parking requirements for developments in high PTAL areas.	No change to the Local Plan required as a result of this representation.
Mr Nick Symons				9	7.63	The northern frontage is unsuitable for a 'civic' space. Sainsbury's delivery and other lorries need the turning circle to deliver to the store. Civic spaces are attracting loiterers and drinkers and late at night they are sleeping in Sainsburys car park and accosting young mothers. There are plenty of other al fresco locations - and this area would be totally unsuitable. We have gathered over 100 signatures from Werter and adjoining roads against any measures to make this area into a civic space. The lack of safety would contravene the measures in HEALTHY STREETS. Large pantechicons backing into Sainsburys would be dangerous to the health of anyone sitting outside in terms of being hit (someone was killed there last year crossing the road) and from fumes.	The Sainsbury's Supermarket site has been allocated for a mixed use development including residential, retail and other town centre uses with public open space. It is expected that any development proposal on this site would result in a significant reconfiguration of the site, meaning that servicing arrangements would also change. Nevertheless, it is agreed that the northern frontage on Werter Road might not an opportunity for a civic space. It is however appropriate for public realm improvements.	Amend PUT5 and state that the site presents an opportunity for public realm improvements rather than a new civic space.
Mr Nick Symons				12	7.63	The northern frontage on Werter Rd is totally unsuitable for a civic space. Sainsburys delivery lorries and pantechicons need to back into the delivery area. A person was killed crossing this area las year. We have over 100 signatures from Werter Rd residents objecting to making this area a civic space. Al fresco dining would cause those sitting there to be in danger from delivery lorries and fumes.	The Sainsbury's Supermarket site has been allocated for a mixed-use development including residential, retail and other town centre uses with public open space. It is expected that any development proposal on this site would result in a significant reconfiguration of the site, meaning that servicing arrangements would also change. Nevertheless, it is agreed that the northern frontage on Werter Road might not an opportunity for a civic space. It is however appropriate for public realm improvements.	Amend PUT5 and state that the site presents an opportunity for public realm improvements rather than a new civic space.
Mr Robert Arguile	Chair The Putney Society			373	Map 7.1	All of these define 'tall' as 6 storeys. We agree with this and that more than 6 storeys / 18m is likely to be inappropriate. The Society is deeply concerned that despite similar wording in the current SSAD all recent approvals on SSAD sites in Putney have granted at 11-12 storeys despite few of the public benefits set out in the SSAD having been achieved. A much more robust definition of offsetting 'public benefit' is required. We are also concerned that almost all allocations seek an expansion of ground floor retail. Do we really need more shops when vacancy rates in the High Street are already high? Alternative cultural or social spaces would attract more visitors to the town centre as a whole. See note to Policy LP1  <b>Missing Allocations</b>  It is worrying that the list above is unchanged from the outgoing Local Plan.  <b>Marks &amp; Spencer.</b> Vacant and adjacent to PUT3 and PUT4. The long back wing is an opportunity for a cultural use and perhaps for a link through.  <b>Bus Garage.</b> Should there be an allocation (again despite the low likelihood of development) for the Chelverton Road Bus Garage, with or without the Exchange? The loss of the Lacy Road entrance to the Exchange was a mistake, wasting the option for a connection through the 56-70 PHS site opposite and on to Weiss Road where it backs on to High Street shops.	The comment relating to tall buildings refers to the implementation of the adopted Local Plan policy rather than the proposed policy approach.  The Retail Needs Assessment (2020) identifies that there is scope for additional convenience and food/beverage floorspace by 2035 equating to a little over 500 sqm, and just shy of 2,000 sqm by 2040. All of this floorspace could be accommodated by the re-occupation of vacant units within the centre, and this remains the priority for the centre. A number of the site allocations already include retail or commercial floorspace, and this should therefore be replaced through redevelopment to ensure the longer-term supply of space is available. To support high street and town centre units, the Local Plan permits greater flexibility of use, including in Core and Secondary Frontages (where thresholds on retail units apply under the adopted Local Plan). The Site Allocations should be updated to reflect this increased flexibility. Such uses could include cultural or social spaces, and indeed LP 45 Development in centres A.2 states that development proposals should 'incorporate a flexible design such that the site could respond to changing market demand and requirements to effectively accommodate alternative town centres uses in the future, helping to enhance the resilience of the centre.'  Three of the sites that have been referenced (Bus Garage/ Putney Exchange; Post Sorting Office; and RSPCA) were considered in the Site Allocation Methodology and did not meet the criteria. The Marks and Spencer site does meet the criteria and has been added as a site allocation.	Wording in site allocations has been amended to permit a greater flexibility of uses, in accordance with the policy approach for town centres.  The Marks and Spencer site has been added as a site allocation.  Changes have been made to the map to remove the suggested location for a new public open space. The Marks and Spencer site allocation has been added to the map.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><u>Postal sorting office</u>. Big, low rise and within the town centre map.</p> <p>RSPCA animal hospital/Eileen Lecky clinic. Just out of the centre lies the RSPCA animal hospital (closing) and adjacent Eileen Lecky clinic. There may be an opportunity here to expand one or both of the adjacent schools.</p> <p>We are puzzled by the inclusion, in the Putney Town Centre 'Sites' map, of the 'suggested location for new public open space' adjacent to the mainline railway station. The station is very close to the busy junction of the South Circular Road and Putney Hill, with its attendant and regular traffic congestion. Whilst always keen to see the development of new open spaces in appropriate places, we cannot see how this congested area could include a new open space.</p>	It is agreed that a new public space to the front of Putney Railway Station would unlikely be deliverable without a major reconfiguration of Putney High Street.	
Paul Dolan				534	Map 7.3	Upon local consultation (27/2/21 to 1/3/21) with residents via Residents Associations both within the Burstock RA and Deodar/Florian/Merivale Road RA it was strongly agreed that no further planning permission be granted to buildings that are more than 4 storeys. The area east of Putney High Street bordering Putney Bridge Road is INAPPROPRIATE for tall buildings that would be higher than the existing residential area. Putney's charm and well looked after housing stock are due to the conservation and investment of the residents, and their wishes should be honoured and taken on board by the custodians of Putney which are the planning department and Wandsworth Council.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	Changes made to policy LP4
Meredith Hyde				486	Map 7.3	<p>'Pre-Publication' Draft Local Plan -- I am writing to argue that it is utterly inappropriate to allow buildings higher than extent properties east of Brewhouse Street (PUT2 &amp; PUT3). The current 10-story and approved 11-story buildings are arguably part of the commercial high street, but development along Putney Bridge Road -- and into the conservation areas and family 3 story housing stock -- would be very detrimental to the area</p> <p>-- this is already a very congested area (in terms of proximity to the high street and the fully occupied housing stock) -- adding to that would put untenable pressure on the park, doctors' surgeries, parking etc</p> <p>-- parts of Deodar Road are already cast into shadow by Jubilee House; this would make it much worse</p> <p>-- it would utterly overshadow the historic Almshouses -- this would undermine the character of the conservation area</p> <p>-- the proposed amendments suggested by the Putney Society -- representing the variety of interests in the community as a whole -- are much more reasoned and proportionate -- there is empty housing stock -- built to attract investment rather than actual residents</p> <p>- nearby on the Upper Richmond Road, and it would be very sad if this mistake was repeated.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.
Paul Dolan				536	Map 7.4	Please see comment made on 7.24. Thank you	The Local Plan sets out how new development proposals should be considered. The Corporate Business Plan sets out ways in which the Council will directly encourage greater use of public transport and reduce car usage.	No changes to the Local Plan are considered necessary.
Mrs Ruth Marie Pates				3	Picture 7.2	There is no real human centre on Upper Richmond Road or Putney High Street. Both are heavily trafficked, noisy and polluted (and URR has few crossing places). This will need to be addressed if the sense of place is to be balanced against current overwhelming emphasis on movement - largely for through traffic, not those visiting the centre. The high vacancy levels suggest that not attractive to retailers	The Area Strategy for Putney seeks to address the identified issues. Policy PM5 requires major development to provide a new pedestrian priority public space. The policy also supports Urban Logistics Hubs for last mile deliveries by electric vans or cargo bikes which can help reduce congestion and pollution. No changes to the Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
Alan Pates				26	Policy PM5	The acceptance of taller buildings along the High Street is in direct conflict with finding a solution to the problem of canyoning that is already an accepted as contributing to very low air quality and poor public health along the street. I did	PM5, Placemaking 3 states that proposals for upward extensions along Putney High Street states will be supported where the extension would be subordinate to the host building. Policy LP14 seeks to ensure that 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 the emerging	Policies LP1 and PM5 have been expanded to include an additional reference to canyon-like effect.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>not see addressing the problem of poor air quality in Putney prioritised anywhere in this section.</p> <p>I note that the pie chart for Putney demonstrates its poor performance with regard to active travel. I did not see any specific proposals to address this.</p>	<p>London Plan Policy SI 1. Development proposals which lead to a canyoning effect will not be supported. Furthermore, changes have been made to policies LP1 and PM5 to ensure that development proposals avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene.</p>	
Mr Mark Poulter				139	Policy PM5	<p><b>PM5</b></p> <p><u>Place Making</u></p> <p>Para F. Interesting to note that the push for public space and ground floor retail on new blocks on the south side of the URR to East Putney are not quoted as a success. Apart from the Waitrose and Costa the planning push has been a dismal failure. Public space should not be forced into inappropriate places such as Werter Road as a mantra.</p> <p><u>Smart Growth.</u></p> <p>Para C. Where? More on Putney Wharf? Along the residential to the boathouses? The Boat houses? Leaders Gardens? There is no more available space. Waterman's Green, Thai Garden, and the Star and Garter(already spoken for) are the only vague possibilities. Why is a café everywhere thought to be imperative?</p> <p><u>People First</u></p> <p>Para A. Why is Positively Putney thought to be the vehicle for the development of "a cultural programme"? They are an organisation to support the interests of business not "the people". Their role is to help businesses feed off us better. Cultural programmes are not the preserve of the Philip Greens of this world. The logic is 180deg wrong way round. Is that what the desire for a cultural programme is about? A few bob for a retailer?</p>	<p>Comment noted.</p> <p>Putney Wharf is recognised as a successful location for leisure and night-time economy (including in the London Plan). It is agreed that there is limited scope for new provision on the riverside, and the focus of this policy should therefore be on facilitating connections between the river and the High Street to create a more integrated experience (as identified in the context section).</p> <p>Working in partnership with Positively Putney is identified within the Council's Arts and Cultural Strategy (Appendix 2, chapter on Putney), alongside landowners and other stakeholders (also referenced within PM5) to utilise empty units, either as meanwhile or permanent spaces for the cultural and creative industries sector, which will help to provide incubator spaces for local creative businesses and attract people to the area.</p>	<p>Amend PM5 Smart Growth C to include reference to the High Street, and better facilitating connections between this location and the riverside.</p> <p>The Area Strategy and Policy PM5 should be updated to reflect the publication of the Arts and Cultural Strategy.</p>
Mr Robert Arguile	Chair The Putney Society			372	Policy PM5	<p><b>Placemaking</b> - this method of numbering clauses under subheadings will lead to confusion in handling applications.</p> <p>Para B 'New development will be expected to protect important views and vistas in the area, including: 1. views from Putney High Street to the adjacent residential areas; Why? See also E. 2. long views towards and across Putney Town Centre from many viewpoints to the south; and 3. views of Zeeta House and St. Mary's Church.'</p> <p>Why are these not reflected in list of protected views elsewhere in the draft plan? The view from Putney Bridge (including the church) is also important as part of Putney's USP.</p> <p>Para C 'Development proposals for upward extensions should explore opportunities to enhance the appearance of the building façades.' Paragraphs 7.6 and 7.9 note the canyon effect exacerbating air quality. Extra floors make this worse. 'explore' is not strong enough to ensure this happens. Putney High Street and the older parades on the Upper and Lower Richmond Roads mainly consist of uniform terraces now owned one or two building at a time. Repair - yes, change - no.</p> <p>Para E 'Where possible major development proposals, .. should provide new pedestrian priority public space as a key element in the design of the development' Supported. However, there is a mixed message here. Any significant extra retail off the High Street will delay filling the high number of vacant shops.</p> <p>'.. which should be linked to the surrounding street network with safe and attractive new routes.' Good in principle but the historic development pattern means that surrounding streets mostly and run direct off the High Street and don't connect to each other.</p> <p>Para F. '.. enhancing East Putney Station.'</p>	<p>Agreed. The numbering of policies has been changed to make referencing clearer.</p> <p>The important views and vistas were identified in the Urban Design Study, which forms part of the Local Plan evidence base. The views and vistas do not have the same planning weight as strategic and locally important views, and therefore have not been referenced in policy LP3.</p> <p>The identified housing capacity of Putney does not include the capacity of Roehampton, which is referenced in policy PM7.</p> <p>As identified, London Plan Policy S6 requires that large-scale developments that are open to the public, and large areas of public realm, should be free publicly-accessible toilets. The London Plan Policy forms part of Wandsworth's Local Development Plan and therefore this policy will apply to such developments in the borough, including considerations relating to ongoing management as identified within the supporting text.</p> <p>PM5, Placemaking 3 states that proposals for upward extensions along Putney High Street states will be supported where the extension would be subordinate to the host building. Policy LP14 seeks to ensure that 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 the emerging London Plan Policy SI 1. Development proposals which lead to a canyoning effect will not be supported. Furthermore, changes have been made to policies LP1 and PM5 to ensure that development proposals avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene.</p> <p>Support for the re-provision of economic uses as part of mixed-use redevelopment noted.</p> <p>The Corporate Business Plan sets out ways in which the Council will directly encourage greater use of public transport and reduce car usage. The Council</p>	<p>The numbering of the paragraphs within all of the Area Strategies have been amended to make referencing clearer.</p> <p>Policies LP1 and PM5 have been expanded to include an additional reference to canyon-like effect.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>What happened to the promised improved pedestrian access from east and west for which the Council has already taken Section 106 money?</p> <p><b>Smart Growth</b></p> <p>Para A Does this housing target of 189 include the 800 in the Council plan for Roehampton?</p> <p>Para C. '... improvements to the public realm to help facilitate connections to this location.' <u>Be specific or nothing will happen.</u> Such developments should be accompanied by a requirement to provide, jointly, public toilet facilities, ideally at the top of Putney High Street and at the riverside end (perhaps reopen/refurbish the old existing ones at Waterman's Green?) to support and sustain the activities outlined, give the area much-needed facilities for visitors and residents, reduce public nuisance, e.g., urinating/defaecating in public places, and the associated hazards to</p> <p>public health of such behaviours. There are no facilities to cater for the increasing number of food delivery riders in particular. Local Plans are required to be in 'general conformity' with the London Plan, which has an entire Policy on public toilets. Chapter 5, Social Infrastructure, Box: Policy S6 Public Toilets, and paragraphs 5.6.1 – 5.6.85.6.6 says Ongoing management and cleaning of facilities should be secured and agreed at the planning stage to ensure long-term provision is achievable. On this latter point: this is essential – provision of capital costs alone is insufficient. CIL monies or planning obligations can be used for smaller developments. Policy S6 also says 'These should be available during opening hours, or 24 hours a day where accessed from areas of public realm'</p> <p>Para D 'maintain and expand offices and other workplace'. We fully support this.</p> <p><b>People First</b></p> <p>Para A A cultural programme needs spaces, both for activities seen and 'back of house'. Promote these ahead of more shops in the site allocations for non-frontage space.</p>	<p>aims to work with TfL to make East Putney Tube station more accessible with less clutter, a new forecourt, appropriate new retail units and more cycle storage. TfL are developing designs for discussion with the Council and have separately commissioned a feasibility study for lifts, funded by S106/CIL. The Council are awaiting designs for public space at East Putney Station from TfL.</p> <p>LP 45 Development in centres A.2 states that development proposals should 'incorporate a flexible design such that the site could respond to changing market demand and requirements to effectively accommodate alternative town centres uses in the future, helping to enhance the resilience of the centre.' (as stated in NPPF cultural uses would be an alternative use).</p>	
Josephine Vos	Transport for London			712	Policy PM5	<p>Given the high PTAL, opportunities for active travel and its designation as an Air Quality Focus Area, all residential and office development should be car free. This should be clearly expressed in policy PM5 and emphasised in all site allocations.</p> <p>We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p>	See LP53 Parking, Servicing and Car Free Development for information regarding parking requirements for developments in high PTAL areas.	No change to the Local Plan required as a result of this representation.
Ms Geraldine Talbot				841	Policy PM5	<p>According to the draft local plan it is intended to allow construction of high rise buildings to the east of Putney High Street along the north side of Putney Bridge Road (PBR) from Brewhouse Lane to the western entrance to Deodar Road.</p> <p>There are a number of reasons why this should not be allowed to happen and should be expressly excluded from the Draft Local Plan when published in 2022.</p> <ol style="list-style-type: none"> <li>1. Permitting high rise buildings to encroach further east along PBR would seriously damage the residential character of the neighbourhood on both sides of PBR.</li> <li>2. The residential buildings to the north of PBR at the western end of Deodar Road would suffer unacceptable loss of light and particularly direct sunlight in autumn, winter and spring.</li> </ol>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	Changes made to policy LP4

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>3. The single storey historic almshouses on the southern side of PBR between Burstock and Atney Roads would be seriously overshadowed.</p> <p>4. The preservation of the historic character of the neighbouring conservation areas would be adversely affected.</p> <p>5. Further over development of this stretch of PBR would aggravate the existing traffic congestion at the junction of PBR and the High Street, where traffic frequently backs up to the east beyond Oxford Road in the morning rush hour.</p> <p>6. High rise buildings, particularly for residential use, would have the potential to put further pressure on the already limited parking in the area.</p>		
John Burke				855	Policy PM5	I would like to object to the section of the plan allowing tall buildings to extend so far East along Putney Bridge Road. The area zoned as suitable for tall buildings extends too far east, and should be confined to the PUT2 & PUT3 site allocations, because going any further east would impact on two conservation areas.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	Changes made to policy LP4
Mike Fawcett				856	Policy PM5	We wish to object in the strongest possible terms to the proposal in the draft Local Plan to allow the construction of tall buildings along Putney Bridge Road all the way from Putney High Street to Deodar Road (so including Dynamo and the terrace of small shops adjoining it), and, it would appear, around the corner to include the site of 1 Deodar Road. The Tall Buildings policy LP4 on page 216 of the draft Plan says that on sites, such as this one, identified in the Plan as "opportunities for tall buildings", up to five stories is acceptable, and higher still can be justified by some sort of [vague and notional] public benefit. So, judging by the 11 storey hotel recently approved about 100 yards away, we can expect buildings of 10 storeys or more. Making this even worse, the national Government's proposed changes to land-use planning will in essence mean that any planning application which complies with the Local Plan will receive approval - so it is crucial that the Local Plan is changed, and is made absolutely clear and precise. We fully support the comment by the Putney Society that the area zoned as suitable for tall buildings extends too far east, and should be confined to the PUT2 & PUT3 site allocations, because going any further east would impact severely on two conservation areas. We live at 7 Deodar Road, and we already suffer a substantial loss of afternoon light, especially in winter, as a result of the 1990s Putney Wharf development. We thought that the controls which WBC imposed on that development, after a huge amount of consideration and debate, would at least prevent things getting even worse in future. We therefore urge that the Local Plan should: i) stop anything more than existing height and massing to the east of Brewhouse Street, and likewise on the south side of Putney Bridge Road to the east of the "PUT3" site. ii) ensure that the conditions imposed in the mid-1990s on the Putney Wharf site, especially relating to heights and densities, must remain in force iii) ensure no windows over-looking our property, as was achieved with the current Putney Wharf design	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	Changes made to policy LP4
Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1520	Policy PM5	<p>PM5 Putney</p> <p>The policy refers to relatively modest growth of least 189 homes by 2037/38. The site allocations refer to town centre uses which could include health, but not to health uses specifically. We note that 'People First' Clause B refers to proposals to develop Putney Library into multi-purpose hub which supports an increased range of community activities, and which includes the provision flexible and affordable workspaces for local people.</p>	Comment noted. The site allocations refer to town centre uses which would not preclude health uses from being developed.	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1456	Policy PM5	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy PM5: Putney.</p> <p>Support part C of the 'smart growth' section of the policy, which states that proposals for leisure and night-time economy uses will be supported and should</p>	Support noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						be located on Putney Wharf and the riverside. Also support the reference in part E of the smart growth section in urban logistics hubs for last mile delivery which could suited to well-connected areas including the Thames Riverside.		

## Chapter 8 - Area Strategy for Tooting

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr John Fletcher				548	8.1	<p>I cannot see the following statements in this document:</p> <p>"Undertake loading and servicing off street where possible, and on side roads where not. • Improve bus standing facilities, especially on routes to Tooting Broadway station and St George's Hospital. • Measures to widen pavements along Tooting High Street and introduce further traffic management for Upper Tooting Road - Garratt Lane - Mitcham Road will be supported. • Pursue opportunities for active travel and help integrate public realm improvements."</p> <p>They were in <a href="https://www.wandsworth.gov.uk/media/8125/tooting_area_strategy.pdf">https://www.wandsworth.gov.uk/media/8125/tooting_area_strategy.pdf</a></p> <p>My question is how does "Undertake loading and servicing off street where possible" work? That would require recessed parking bays which would take away from your widened pavements and bring commercial rivers into conflict with users of active transport.</p>	<p>Comments noted. PM6: People First contains all the sentences you are looking for, although they have been altered slightly from the Tooting Area Strategy document you refer to.</p> <p>LP53 Parking Servicing and Car Free Development explains that off street servicing arrangements are preferred but in some situations it may not be possible.</p>	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1005	8.1	<p>2a Introduction and general comments We welcome in principle the approach of having Area Strategies for each of the Borough's main places. However, Tooting is the only part of the Borough with a Neighbourhood Forum and as such there is a strong case for treating it differently from the other Area Strategies, given that there is already an emerging planning framework and neighbourhood evidence base resulting from our work. Although in this context we welcome the reference to the Neighbourhood Forum in 8.1, no map of the Neighbourhood Forum boundary is provided. The neighbourhood plan boundary is of course already available on the Council's website.4 8.1 goes on to state 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 have been considered and incorporated into the Area Strategy. This strategy and the proposed Neighbourhood Plan will inform and complement each other.' We are surprised by this statement, given that the Council has not thus far liaised with us on the emerging neighbourhood plan or 'the initial outputs of this process', which presumably means the emerging evidence base documents available on the Forum website (though this is not clear). 4 <a href="https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/neighbourhood[1]planning/tooting-bec-and-broadway-neighbourhood-area-and-forum-designation/5">https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/neighbourhood[1]planning/tooting-bec-and-broadway-neighbourhood-area-and-forum-designation/5</a> We have requested a meeting with the Council but did not get one, even though such a meeting was, we understood, held with community representatives in Balham. It will, of course, not be possible for the Area Strategy and the proposed Neighbourhood Plan to inform and complement each other if the Council continues to fail to engage with the Forum. We note that as Tooting is a Strategic Area for Regeneration (SAR) in the London Plan, the Mayor's policy SD10 applies. It states that policies for SARs should be 'based on a thorough understanding of the demographics of communities and their needs'. Additionally, within SARs, Boroughs should 'engage and collaborate with communities at an early stage and throughout the development of local development documents, strategies and regeneration programmes.' We would, of course, warmly welcome such engagement and indeed would argue that it will not be possible for the Council to produce a workable Area Strategy for Tooting meeting the requirements of London Plan policy SD10 without much closer working with the Forum so that we can dovetail which policy sits better in the Neighbourhood Plan and which in the Area Strategy. This will avoid duplication or overlapping of work on both sides and will ensure policy gaps are filled appropriately. Most importantly from the Council's perspective, it will help ensure that the Area Strategy has broad support from the diverse community that we represent and that it, together with the Neighbourhood Plan, can address some of Tooting's persistent issues in a holistic, joined-up way. We look forward to such liaison immediately following the conclusion of this Regulation 18 consultation and subsequently as the Local Plan develops through to Examination, where we will make representations to the Inspector if necessary to do so. Given the unfortunate lack of communication thus far between the Council and the Forum, it would also be very helpful to understand which elements of our work the Council has relied on, because it is not individually cited or credited. Contacting the Forum</p>	<p>Support - in principle - for the development of Area Strategies is noted, alongside concerns raised.</p> <p>The majority of the Area Strategies have been deliberately focused on relatively smaller geographical areas (typically focused around a town centre boundary, and any adjoining regeneration efforts). This is linked to areas which, in the Council's opinion, present opportunities for growth and regeneration over the Local Plan period (see paragraph 3.24). For consistency with the other Area Strategies, this geography is considered appropriate; areas beyond this boundary would be covered by the Local Plan's topic-based policies. It is recognised that the Tooting Bec and Tooting Broadway Neighbourhood Forum have designated a Neighbourhood Area that is wider than the Area Strategy, however this would enable the Forum to bring forward a set of policies for an area that is not otherwise singularly addressed within the Plan - in keeping with the ambitions of Neighbourhood Planning.</p> <p>The Tooting Bec and Tooting Broadway Neighbourhood Area boundary is shown on the Local Plan Key Diagram; the scale of the area meant that it was not possible to include on the Tooting Area Strategy map.</p> <p>In developing the Area Strategy, the Council referred to the Tooting Bec &amp; Broadway Neighbourhood Characterisation Study, Phase 1 Part 1 (2019, Jan Kattein Architects), alongside Council commissioned documents such as the Urban Design Study (2020). These will be published on the Council's webpage as part of the evidence base when the Local Plan is submitted to the Secretary of State. The Area Strategy, although referring to a more tightly defined geography, is well-aligned with the responses from the Forum's First Phase Public Consultation Report (2018, Richard Couldrey).</p> <p>References to the Area Strategy needing to meet the vision and objectives of the Local Plan are considered appropriate and required for the Local Plan to be considered 'positively prepared' with respect to the NPPF's Tests for Soundness. It is standard language which is used across all the Area Strategies, and which connect the vision for each area to those of the Local Plan. The Council would, of course, wish to see the Area Strategy widely supported by the Community, and the Regulation 18 consultation offers an opportunity for the submission of representations. In support of the Local Plan, the Council has held targeted meetings with 'seldom heard' groups from across the borough, including groups that may not be familiar with the Local Plan and its impact. An event was held with students from Tooting in February 2021.</p> <p>The Council is willing to work with the Neighbourhood Forum on the development of a Neighbourhood Plan; please contact Policy Officers to arrange a meeting to explore what support can be provided on the development of the Neighbourhood Plan. That notwithstanding, the Council does not control the timescales for, and cannot necessarily rely on a Neighbourhood Plan coming forward, and therefore it is important that policy protection, where appropriate, is</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						before using the work we commissioned could also have provided useful context and background for the technical evidence and consultation responses we have gathered thus far, which in turn would have improved the quality, detail and clarity of the Area Strategy. Important evidence the Forum has gathered which the Council may be aware of include the results of our initial community consultation <sup>5</sup> and the Characterisation Study <sup>6</sup> we commissioned. We aim to work with the Council on a subsequent Public Realm Study.	included within the Local Plan (with respect to policies being dovetailed between the Neighbourhood Plan and the Area Strategy). A Neighbourhood Plan must be in general conformity with the strategic policies of the development plan (the Local Plan and the London Plan) in order to meet the basic condition.  It is considered that the Area Strategy appropriately addresses the criteria of Policy SD10 of the London Plan. The Area Strategy for Tooting identifies that parts of Tooting as a Strategic Area for Regeneration. It includes a place-based policy for the area, the wording of which was informed by a range of evidence base documents and responses to the Regulation 18 consultation. The Area Strategy sets out a holistic approach that will steer regeneration activity and direct locally sensitive action to improve the quality of life for local people, ensuring that new development is sensitive to – and enhances – the existing positive elements of the neighbourhood, both built environment and sense of community. It identifies that parts of the area exhibit signs of deprivation, particularly in terms of quality of living environment, crime and barriers to services. Policy PM6 and Site Allocations include requirements which seeks to address these issues. For example, the Site Allocation for Tooting Market seeks to bring environmental improvements to the site by requiring the creation of a safe, secure and appropriately accessible environment. Development proposals will be required to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion. Policy MP6 seeks to reduce the dominance of cars and improve opportunities for active travel.	
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1024	8.1	Omissions from the Tooting Area Strategy a. Green infrastructure as noted in our previous comments, the draft Local Plan and its evidence base are deficient in terms of green infrastructure. For the Tooting Area Strategy chapter, this means important contributions made by local green spaces to Tooting's sense of place are missing. If the Borough propose to address this evidence gap, then the following place-specific issues would need to be addressed through the Tooting Area Strategy: • The future role of Fishponds Playing Fields, in Council ownership, which until the recent pandemic were formerly underused and inaccessible. The fields have recently been opened up to the wider community and this is very welcome, but certainty is needed that they will remain open given the local open space deficit and the national policy agenda to promote active lifestyles. <sup>13</sup> Fishponds has significant further potential as a genuinely multi-functional green space, accessible by active travel modes, sustaining its role for formal and informal community sport but adding opportunities for recreation and relaxation, including meeting space for the elderly, vulnerable and disabled. Initiatives similar to the Merton Mile at Figges Marsh <sup>14</sup> could be supported, and the Fields should be promoted as a location for community gardening (in line with London Plan policy G8) and outdoor learning. Accessibility could be increased by providing a path around the perimeter for users of wheel-chairs, buggies and mobility scooters. Biodiversity value could be enhanced, for example through new tree planting and softening boundary areas to enable a wider diversity of flora and fauna and to build a wildlife corridor with the high biodiversity in the neighbouring Streatham Cemetery. While the proposed enhancements outlined above for Fishponds may appear at first sight overly detailed for the Local Plan level, they are nevertheless considered proportionate given: a) the existing open space deficit; b) the fact that most if not all of the proposed new residential development in Tooting will lack private garden space; c) that the measures proposed are specifically referenced in the WESS and therefore would demonstrate usefully how the Climate Emergency Declaration is being translated meaningfully to specific local interventions; and d) would ensure the Plan aligns with London Plan policies G1 Green Infrastructure, G4 Open Space, G6 Biodiversity and Access to Nature, G7 Trees and Woodlands and G8 Food Growing. • There is no mention across the draft Plan of a replacement Playing Pitch Strategy for the borough, but the Forum understands that one is being prepared. If this is the case, then the Forum would wish to provide input. <sup>13</sup> For example, Sport England's recently published 10 year strategy at <a href="https://www.sportengland.org/why-were-here/uniting-the-movement">https://www.sportengland.org/why-were-here/uniting-the-movement</a> <sup>14</sup> This is a signposted route which Merton Council opened to encourage all residents, whatever their age or fitness levels, to walk, jog or run a mile every day. Since opening in 2019, this initiative has become very popular in an area of relative deprivation with a diverse population. <sup>14</sup> • There is a significant and currently missed opportunity to create a new green infrastructure and biodiversity corridor/chain of spaces by creating a Green Way between Lambeth Cemetery in the south, through St Clement Danes Almshouses, into Streatham Cemetery, then to Fishponds	Fishponds Playing Field will be retained as a playing pitch with access to the public when the pitches are in use. The Playing Pitch Study conducted an extensive consultation process with sports clubs in the area and found the demand for playing pitches in the area warranted its retention as a playing pitch.  LP55 Protection and Enhancement of Green and Blue Infrastructure and LP60 River Corridors both encourage the protection and enhancement of green chains. Through LP20 New Open Spaces and LP59 Urban Greening Factor greener infrastructure will come forward helping to grow green chains and corridors across the borough, including Tooting.  The Council welcomes the work done by the Neighbourhood Forum on parklets. The previously mentioned policies show the councils support for all types of open space and this is built into both site allocation TO 1 and TO 2.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Playing Fields and the remaining green space around Springfield Hospital. A new walking route in this location (which could form part of a wider network named 'Wandering Wandsworth's Green Chain' or similar) would link existing pedestrian and cycle ways from the Wandle Trail through to Wandsworth Common and up to Clapham Junction. London is a National Park City pioneering ways to make global cities greener, healthier and wilder and this new Green Way would form not only an essential part of the Borough's green infrastructure but also improve pedestrian access and walkability by linking older paths to newer routes. National Park City Rangers live in Tooting and can champion such initiatives on the ground. • Seeking and supporting opportunities across the Tooting Neighbourhood Plan Area for new parklets/pocket parks, both as part of new development (in line with London Plan policy G5) and as a general principle of public realm improvement and placemaking. This could include the conversion of surface parking to green space. Members of the Neighbourhood Forum have carried out an audit of implementable, low cost opportunities for parklets/new areas of open space around Tooting and would be happy to work with the Council to build the audit into a comprehensive green infrastructure strategy. We look forward to further engagement at the earliest possible opportunity with the Council, including informal meetings as well as statutory consultations, to help shape the draft Local Plan as it progresses towards Examination and as the Neighbourhood Plan develops further.		
Dr Rosena Allin-Khan (MP)				1208	8.1	(vi) Local Economy:  Businesses throughout Wandsworth and in my constituency on Tooting have been dealing with huge levels of pressure and uncertainty throughout the coronavirus pandemic.  I am assured that the plan does not pose any threat to either Tooting or Broadway Market, both of which are large retail and hospitality hubs within Tooting and are vital to the local economy. Removal or damage to any part of the markets would be detrimental to the community at such an unprecedented time.	Comments noted.	No change to the Local Plan required as a result of this representation.
Riccardo Composto	Tooting Healthy Streets			1276	8.1	See attachment for representation  <b>Comments on Tooting Area Strategy</b>  <b>8.1</b>  We strongly support the aims of 'delivering improvements to the public realm, encouraging sustainable modes of transport and contributing to the health and wellbeing of the people of Tooting'.  In light of the recent experience with trial Low Traffic Neighbourhoods in Tooting we propose inclusion of text here - or overarching in the plan - to make clear the importance of involving the diverse community in plans through effective consultation and engagement with local people and representative groups.	The Council always aims to ensure all consultations are representative of the diverse communities that make up the borough. It would not be appropriate to include language of that sort in the Local Plan.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1295	8.1	8 Area Strategy for Tooting We would like to make the following suggestions:  - More street furniture be provided outside railway and underground stations. We would like clarity on the following  : - With the loss of car parking spaces given the development of the car park at St George's Hospital, what travel plans are in place to ensure that access for patients and visiting family members is not compromised? (TO2)  - How does Crossrail affect plans for Tooting development?	Policy PM6 supports measures to modernise and declutter Tooting High Street.  Development at St. George's Hospital may require a Transport Assessment that would include a Travel Plan.  With regards to Crossrail 2 see para 8.7 as a station at Tooting Broadway has not yet been confirmed. The Local Plan recognises that Crossrail 2 would further improve Tooting's transport links but would bring significant challenges to the operation of the town centre.	No change to the Local Plan required as a result of this representation.
Tony Burton	Wandle Valley Forum			1742	8.1	Only 28 of the Local Plan's 73 policies are defined as "strategic" demonstrating the considerable scope for detailed planning policies to be more community-led and delivered through neighbourhood plans. We are supportive of efforts to strengthen neighbourhood planning in the Wandle Valley, drawing on the early experience in Tooting Bec and Broadway and further upstream in Hackbridge	Comments noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						and Beddington Corner which has a completed neighbourhood plan. This will require stronger support from Wandsworth Council to be realised.		
Libby Lawson	Tooting History Group			414	8.3	The RACS building, the corner facade of which is retained, restored and part of a new development, dates from the 1920s. It was a department store and more recently had a history of retail use on ground floor and a Hindu Temple on the upper floors. Links with dancing and music concerts are not a significant part of its history.  The former Granada Cinema is now 'Buzz Bingo'	Comments noted. This should be corrected within the Local Plan.	Amend paragraph 8.3 to remove the incorrect reference to the RACS building as part of Tooting's past entertainment offer, and to correct the reference to Buzz Bing rather than Gala Bingo.
Dr John Fletcher				539	8.3	Evening economy aside, does any other aspect of Totting warrant an NT3 classification? If so, then motorised transport may be important, if not then it probably isn't.	The night-time economy classifications are set by the Greater London Authority (GLA), and relate to economic activity taking place between the hours of 6pm and 6am. Generally, town centres such as Tooting are subject to this designation on the basis of good public transport accessibility and a concentration of uses (such as restaurants, etc) we operate over these hours. Appropriate considerations for transportation - public and otherwise - are set out within the topic-based policies of the Local Plan.	No change to the Local Plan required as a result of this representation.
Mr William Glover				23	8.6	Paragraph 8.6 highlights the poor quality of sections of the CS7 cycle lane. In my experience of cycling along this road I constantly having to swerve around parked cars into faster moving traffic behind me. Junctions pose a particular threat once two vehicles leave a gap for a motorist wishing to turn into a side street. Often motorist will drive into the cycle lane if there is only a painted line to prevent them.	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr James Murphy				90	8.6	The plan states that Tooting suffers from high traffic and high pollution and that "cars are prioritised over pedestrians". During Summer 2020 something actually happened – LTNs were installed (with TFL cash) for a promised 6-month trial by the council – It lasted a matter of weeks after they got cold feet. There was scant evidence that traffic jams were being caused by the LTNs (they continued once removed!) as data motioning was poor or non-existent. No modifications of the 'live trial' happened – Tooting's planters were sent to pretty up Putney and Wandsworth Town! Tooting was left with nothing and the traffic, pollution and rat-running remains.  Fewer than 50% of Tooting owns a car and the majority of traffic is simply passing through, contributing no economic benefit to the local economy – we are connected with some of the best public transport in the country, yet cars are still prioritised over everything else. What will be done to meet the aims here for active travel? Notorious rat runs in Graveney remain. Whilst the LTN wasn't perfect and needed tweaks, residential roads need to be returned to what they were designed for.  Junctions throughout Tooting prioritise cars when they should prioritise people – Tooting Broadway junction itself is dangerous and horrible to cross. 15 MILLION people enter /exit Tooting Broadway tube a year – surely these people (who live and work in Tooting) should take priority over motorists passing through. Finally, the council have decided to battle TFL over protecting cyclists – I don't own a bike but can't understand why you wouldn't want to protect human life and promote active travel.	Comments noted. Policy LP51A establishes that the Council will 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. This promotes a balanced and multi-modal approach to movement.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			219	8.6	"faster and safer" should read "direct" as the route has a very poor safety record  "certain sections" should read "much of the bicycle link is poor quality and requires an upgrade, including all of the section in Wandsworth"  We recommend reference is included the temporary improvements to CS7 made by TfL in 2020 and that support will be given for permanent changes to separate people cycling from traffic and relocate parking.	The following sentences in Paragraph 8.06 does explain that issues with safety do exist but the current wording is intended to apply to the entirety of CS7. The wording is considered sufficient to meet the aims and objectives of the Local Plan.	No change to the Local Plan required as a result of this representation.
Dr Samuel Clifford				575	8.6	Steps should be taken to ensure continuity of walking experience along the A24, and to introduce measures that prioritise pedestrians such as wider footpaths (where possible), and conversion of refuge islands to either zebra crossings or signalised crossings.	Comment noted. The place making strategy for Tooting (PM6) states the council's support for pavement widening along Tooting High Street (People First, C). This is supported by LP 15 and LP 51 (Now LP49).	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr John Fletcher				540	8.6	Re: ladders  I went to the TfL consultation on Tooting high street ( <a href="https://consultations.tfl.gov.uk/roads/tooting-town-centre/">https://consultations.tfl.gov.uk/roads/tooting-town-centre/</a> ). When I raised my concerns regarding the continuous pavement/footway and the risk from right-turning car drivers smashing into my toddler, the people I spoke to stated explicitly that you (the council) had refused to change any side-streets. If I compare the A24 through Tooting and the Merton controlled section between Collierswood and South Wimbledon it is clear which council has decided to make a difference on "ladders"	The Low Traffic Neighbourhoods in Tooting have been removed and new street safety measures are being considered.	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1008	8.6	8.6 "Tooting is designated as an Air Quality Focus Area due to the high levels of pollutants on the main road" This should be 'main roads' as both Tooting High Street and Mitcham Road have pollution monitors that show consistent exceedance of the annual limit for NO2 emissions. "Tooting is located on the CS7 cycle superhighway, offering local people a faster and safer route into the City and it will be important to continue to improve connectivity on this important route." The section of CS7 through Tooting has a very poor safety record and falls short of TfL's Quality Criteria for Cycleways as well as the National Local Transport Note 1/20 on Cycle Infrastructure. TfL's Vision Zero plan7 identifies sections of Tooting High Street as having four times the average road danger for the TfL road network. For this reason, we suggest replacing 'faster and safer' with 'direct'. We strongly support the statement that 'sections of the bicycle link are of poor-quality and require an upgrade' but this should go further and make clear that 7 <a href="http://content.tfl.gov.uk/vision-zero-action-plan.pdf">http://content.tfl.gov.uk/vision-zero-action-plan.pdf</a> the poor quality relates to an unacceptable casualty record (TfL data8 shows Tooting Bec to Tooting Broadway saw 140 collisions and 56 cycle casualties, including eight serious injuries in the 36 months prior to December 2019). All of these proposed changes will help ensure the Plan aligns better with London Plan Policy T5 (Cycling). The Plan should also include reference to the Council's plans for a major cycleway on Garratt Lane, connecting Tooting Broadway to Earlsfield and Wandsworth Town, which is currently being implemented in temporary form. Later drafts of the plan should be updated to reflect the infrastructure elements of the developing Walking and Cycling Strategy to 2030; this point is relevant to the whole borough.	Agree, text should be altered to refer to main roads not road. Information on the major cycleway on Garratt lane is captured in the Wandsworth Corporate Business Plan, the Local Implementation Plan and the Walking and Cycling Strategy which is referenced in the Local Plan.	No change to the Local Plan required as a result of this representation.
Riccardo Composto	Tooting Healthy Streets			1277	8.6	See attachment for representation  <b>8.6</b>  'The area, however, suffers from heavy traffic, which combined with narrow pavements, creates a busy and noisy environment'  We agree with this statement, but it should add 'with a poor road casualty record'. The A24 through Tooting has been identified by TfL as having four times the average road danger compared to the London wide TfL Road Network (red routes). It is important that this is recognised and understood by planners and developers. The following map from TfL's road danger reduction dashboard shows the collisions in Tooting from January 2017 to June 2020.  'The 'ladder' formation of Upper Tooting Road, with frequent intersections, further prioritises cars over pedestrians, creating an interrupted walking experience.'  In addition to the walking experience this creates poor conditions for cycling, with turns in and out of the side roads. This paragraph should be expanded to the effect that 'many side streets suffer significant and unsuitable volumes of	Comments noted. The Local Plan is not considered the most appropriate document to consider road casualties whereas the Wandsworth Local Implementation Plan does.  The Low Traffic Neighbourhoods in Tooting have been removed and new street safety measures are being considered.  Improvements to individual roads are better captured in the Local Implementation Plan and the Corporate Business Strategy.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>through traffic'. Reference should be made to the TfL Town Centre plan for Tooting, which proposed continuous footways at the side streets.</p> <p>It seems a significant omission - here and in 20 Sustainable Transport - that Low Traffic Neighbourhoods (LTNs) are not mentioned. These were introduced on a temporary basis across Tooting in 2020 as well as some other parts of the borough. They are currently 'suspended' although small pockets are being brought back with advance consultation. This was a major innovation in Wandsworth. LTNs are also becoming an increasingly key part of the toolkit for managing urban traffic in London and across the UK, with central government support. Given this context we suggest specific inclusion of text about LTNs and the problems they can be used to address.</p> <p>'Tooting is designated as an Air Quality Focus Area due to the high levels of pollutants on the main road'</p> <p>This should be main 'roads' as both the A24 and A217 have permanent pollution monitors showing consistent annual exceedances of the NO2 mean objective of 40 µg/m3.</p> <p>'Although Tooting is located on the CS7 cycle superhighway, offering local people a faster and safer route into the City; certain sections of the bicycle link are of poor-quality and require an upgrade, and issues of cars parking on this amenity are also prevalent.'</p> <p>The section of CS7 through Tooting has a very poor collision/casualty record (e.g. Tooting Bec to Tooting Broadway 140 collisions, 56 cycle casualties including eight serious injuries in 36 months prior to December 2019) and falls short of TfL's Quality Criteria for Cycleways as well as the National Local Transport Note 1/20 on Cycle Infrastructure. The Local Plan should include reference to supporting improvements to the safety and quality of CS7 in addition to connectivity.</p> <p>The description 'faster and safer' is inaccurate and could be changed to 'direct' and we also suggest amending 'certain sections of...' to 'the bicycle link is of poor quality'.</p> <p>The draft Plan also does not refer to the temporary improvements to CS7 that TfL made in 2020, which includes some separation from traffic using wands and bus stop bypasses, as well as relocation of parking bays. This should be referenced here and that the council will support permanent upgrades to make walking and cycling the A24 safer and more pleasant.</p>		
Libby Lawson	Tooting History Group			415	8.8	<p>76 locally listed buildings and other assets recently mapped onto Wandsworth's planning portal map are testament to the diversity of Tooting's history; varying in scale they include assets from Georgian, Victorian, Edwardian and more contemporary times. We welcome acknowledgement these assets, significant contributors to the distinctiveness of Tooting and agree that they continue to thrive in new and unexpected ways such as the Khasla Centre; a Gurdwara in the terracotta faience former post sorting office. But specifically, which 'architectural gems' are being referred to? The removal of insensitive signage would better reveal the character of many properties on the high street. In addition, we feel enhancement to the setting of some listed buildings; Waterfall House and 91-101 Tooting High Street would be of great benefit to the street scene.</p>	<p>Architectural gems' refer to high quality frontages along Upper Tooting Road.</p> <p>Policy PM6 supports measures to declutter Tooting High Street.</p> <p>Proposals for enhancements to the setting of listed buildings will be assessed in accordance with policy LP3.</p>	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1009	8.8	<p>8.8 The text on historic buildings and cultural heritage is welcome but more detail is needed, including acknowledging the extent to which distinctive local character has been eroded through permitting intrusive and extensive plastic shopfronts and signage in many locations. We agree strongly with the point about 'architectural gems' that are neglected- in particular, the fabric of the upper stories of buildings is not just neglected but in some cases at risk and struggling retail and/or private landlords will not be able to fix this. There is potential for the human history of the area to be better profiled with, for example, signage, plaques or some other form of streetscape annotation, although it is recognised that this would need to be balanced with the urgent need to declutter the streetscape.</p>	<p>The supporting text of the Area Strategy has been informed by the Urban Design Study. The context section of the supporting text states the following: 'To the northern end of the High Street, approaching Tooting Bec Station, there is some evidence of mixed management and maintenance of shop frontages, including some blank facades and the degradation of historic features on upper storeys, which is detrimental to the overall shopping experience.'</p> <p>Policy PM6 supports measures to declutter Tooting High Street, and repair, improve and unify existing frontages on Tooting High Street.</p>	Expand policy PM6 to state that where appropriate public realm improvements should aim to celebrate the history of the area.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							It is agreed that opportunities should be explored to provide streetscape improvements which make a reference to the history of the area.	
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1010	8.9	8.9: We believe that the place performance analysis has potential as a good starting point but we would urge the Council to add to this generic format used across all the Borough town centres the wealth of much more locally-specific evidence we have already gathered (again, in line with London Plan policy SD10). As well as the evidence commissioned by the Forum referenced above, the Tooting History Group has catalogued 76 locally-listed assets through consultation with local people that now appear on Council maps.9 While the draft Plan's references to local listings are welcomed, it would be helpful to cite this catalogue as a source (if indeed it was used as such) so that Plan users can get a clearer picture of exactly which assets are being referred to.	The place performance diagrams were informed by a qualitative assessment and by an online consultation survey conducted as part of the Urban Design Study and internal consultations with key stakeholders.  The Council holds a list of buildings that are of architectural or historical interest at a local level, which is considered sufficient.	No change to the Local Plan required as a result of this representation.
Mr James Murphy				93	8.10	The proposed Mellison Road pocket park seems to be no nearer happening at time of writing. When will work start? The plan states that Tooting suffers from a lack of green space, but nothing has changed in years. I saw someone comment online that Sainsbury's car park could be turned into a park – seems like a good idea to create new green space – there's really no need to drive to a supermarket when you have 5 within a few minute's walk and they all offer delivery services.	Policy LP20 requires major developments to provide new public open space on site. Part A (7) of the policy requires that proposals for new public open space maximise biodiversity benefits.	No change to the Local Plan required as a result of this representation.
Dr Samuel Clifford				577	8.10	The 15 minute neighbourhood goal is an incredibly useful tool for ensuring access to services for all residents. While Wandsworth has plenty of larger parks accessible to Tooting, such as Tooting Commons, Wandle Meadow and Streatham Common, special attention should be given to ensuring smaller parks and recreation areas are spaced throughout the neighbourhood so that each area bounded by A roads and surface level train lines (major barriers for pedestrians) has a park within safe walking distance.	Comments noted. Tooting performs well with regards to the 15-minute goal. Site allocations TO1 and TO2 include provisions for open space, with a requirement for a small pocket of public space/parklet to be provided at TO2. There are several policies that stress the need for open space, recreation areas, and parks throughout the borough. See LP 19 Play Space, LP 20 New Open Space, LP 55 Protection and Enhancement of Green and Blue Infrastructure (Now LP53), and LP56 Open Space, Sport and Recreation (LP54). LP 55 parts B and C references the importance of protecting green infrastructure in small spaces.	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1013	8.10	8.10: The text states "Tooting does generally well... although improvements around open space, nature and climate change mitigation would deliver further success.' We agree. As such, the strategy should make these items the focus of specific land use policies, but currently does not, so misses significant place-making opportunities. This is a further illustration of the need for a Green Infrastructure Strategy. See also our detailed comments on Area Strategy omissions below.	LP10 sets out the Council's approach to Climate Change mitigation. Wandsworth is currently preparing a Biodiversity Action Plan and there is consideration of an Open Space Strategy ongoing.	No change to the Local Plan required as a result of this representation.
Riccardo Composto	Tooting Healthy Streets			1278	8.10	See attachment for representation  <b>8.10</b>  'This performance assessment has highlighted that Tooting does generally well with regards to Placemaking; although improvements around open space, nature and climate change mitigation would deliver further success.'  Putting 'Traffic and Public Transport' into the same segment of the diagram masks the traffic problems because Tooting has excellent public transport links. Improvements to the traffic situation, particularly the experience and casualty record of main roads and the dominance of motor vehicles on unsuitable residential back streets are urgently needed.	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr William Glover				24	8.11	this paragraph and the diagram in section 8.1 clearly illustrates Tooting poor performance in terms of active travel. This problem was further exacerbated by the removal of LTN and the much CS7 segregated cycle lane. I was like to these measures to be put back in place to enable active travel and improve the quality of air we breathe.	Comments noted.	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1006	8.11	Because the Area Strategy does not make its evidence base clear, it is difficult to see what evidence underpins the Vision (8.11). It appears to be top-down ('meet the vision and objectives of the Local Plan' rather than bottom up (e.g. not referring to the Neighbourhood Plan or the Forum's extensive community consultation as summarised in footnote 2 below).  The vision needs to be bottom-up as well as top-down so that it enjoys support from the local community. In ensuring the neighbourhood perspective is	The Area Strategies have been prepared in the context of the NPPF and London Plan. The evidence base behind the Area Strategies is set out in the introduction to the Placemaking chapter. The key studies/documents which informed the Area Strategies include: Urban Design Study, Open Space Study, Retail Needs Study, Employment Land and Premises Study, Local Implementation Plan (Transport), Local Flood Risk Management Strategy, Active Wandsworth Strategy, Air Quality Action Plan, Biodiversity Strategy (in preparation), Health and Wellbeing Strategy, Wandsworth Community Safety Partnership Plan, Arts	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>captured, particularly in the context of the pandemic, the Council needs to consider new and innovative ways to engage and consult with the community in Tooting, including its harder-to-reach groups who will certainly feel excluded based on the present wording of the draft Local Plan.</p> <p>5 <a href="http://neighbourhoodforumtooting.uk/wp-content/uploads/2019/02/TBBNP-First-Phase-Public[1]Consultation-Report.pdf">http://neighbourhoodforumtooting.uk/wp-content/uploads/2019/02/TBBNP-First-Phase-Public[1]Consultation-Report.pdf</a>.</p> <p>Key messages emerging were that the local community particularly values Tooting's diversity, community and food; that its markets, green spaces and architecture should be preserved; that there is demand for further cultural and youth amenities, green and public spaces and a wider range of shops, and that the biggest single issue holding Tooting back is the streetscape, with persistent problems of traffic/congestion, walkability, air quality and litter/fly tipping,</p> <p>6 <a href="http://neighbourhoodforumtooting.uk/wp-content/uploads/2019/11/Copy-of-190706-Tooting-Bec-and[1]Broadway-Neighbourhood-Characterisation-Study-Phase-1-Part-1-opti.pdf">http://neighbourhoodforumtooting.uk/wp-content/uploads/2019/11/Copy-of-190706-Tooting-Bec-and[1]Broadway-Neighbourhood-Characterisation-Study-Phase-1-Part-1-opti.pdf</a></p>	<p>and Culture Strategy (in preparation), Wandsworth Environment and Sustainability Strategy. The Regulation 18 Local Plan consultation provided an opportunity to comment on the proposed draft policies, including the Area Strategies. This provided an opportunity to engage from the early stage of the Plan Review.</p> <p>The revisions made to the Area Strategy seek to address the key issues raised in the First Phase Public Consultation Report.</p>	
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1007	8.11	<p>This section sets out our further paragraph-by-paragraph comments on the Tooting Area Strategy, comprising pages 141 to 151 of the draft Plan. 8.2: Notes the unique character of the area. This is welcomed, in particular the way that this point is carried through into the Vision (8.11) that seeks new and sensitive development to respect local distinctiveness. However, the Forum's characterisation study evidences much more than Tooting's built form, correctly acknowledging that much of Tooting's unique character comes from the people that live here and their past, present and future activities. This needs to be recognised and taken into account sensitively in all future development. 8.3: states that the RACS building provides a link to 'Tooting's past entertainment offer of music concerts and dancing shows.' This is not correct- it was a department store. 8.6: 'The area suffers from heavy traffic, which combined with narrow pavements, creates a busy and noisy environment.' This statement is supported as it is completely accurate but does not go nearly far enough. It needs to acknowledge that the narrow pavements (which also hamper social distancing in pandemics) are in many locations needlessly narrow due to underused and unnecessary street clutter (derelict phone boxes, traffic railings, signs and so on) requiring removal. It should also state that the environment is not just 'busy and noisy' but also polluted, congested and dangerous for pedestrians. 8.6- 'The 'ladder' formation of Upper Tooting Road, with frequent intersections, further prioritises cars over pedestrians, creating an interrupted walking experience.' This statement is strongly supported - but should add 'and unacceptable road casualty record'. TfL's traffic management scheme has used mid-road wands and banned turns to help mitigate this effect significantly in some locations, and this should be noted, with support given for making the TfL arrangements permanent. At present, some Wandsworth Councillors are actively campaigning against them, thus contradicting the emerging conclusions of their own emerging Plan. The Plan could and should reference many other locations where cars are prioritised over pedestrians, making for a poor pedestrian experience and high levels of road casualties. These include in particular the junction of Trevelyan Road and Tooting High Street, and the four-way junction of Mellison, Franciscan and Mitcham Roads. This would help ensure the proposals for Tooting align better with London Plan policy T2 Healthy Streets.</p>	<p>The findings of the Tooting Bec &amp; Broadway Neighbourhood Architects Characterisation Study have been considered when developing the Area Strategy. This is emphasised in the Introduction to the Area Strategy, which states: 'The Tooting Bec and Broadway Neighbourhood Forum are currently in the process of drafting their Neighbourhood Plan and the initial outputs of this process have been considered and incorporated into the Area Strategy'. The vision for the Area Strategy recognises that the character of the area comes from the built environment, as well as the people that live there and their past, present and future activities. The Area Strategy therefore will seek to provide social and community uses as part of new development that meet the needs of the local community. Further, it will seek to enhance 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.</p> <p>It is noted that the RACS building is erroneously identified as providing a link to the area's past entertainment offer. This should be corrected.</p> <p>Existing street clutter and narrow roads: The Corporate Business Plan and the Local Implementation plan identify as a key action that the Council will appoint a "healthy streets" champion that works to help reduce street clutter and create new pocket parks, as part of a total safety approach. These documents also consider road casualties and how best it be managed.</p>	Paragraph 8.3 has been amended to remove the incorrect reference to the RACS building as part of Tooting's past entertainment offer.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1015	8.11	<p>8.11 Vision: "• Improve opportunities for active travel." This statement should be made clearer and more ambitious, along the lines of: "Make walking and cycling in Tooting safe and inclusive and normalise cycling as an everyday way to get around." (Again, London Plan policies T2 and T5 should guide the approach here).</p> <p>8 <a href="https://consultations.tfl.gov.uk/general/f2826d1b/user_uploads/cs7-upgrade-balham-colliers-wood[1]briefing.pdf">https://consultations.tfl.gov.uk/general/f2826d1b/user_uploads/cs7-upgrade-balham-colliers-wood[1]briefing.pdf</a></p> <p>9 These vary in scale but comprise buildings and other assets covering the history of Tooting from early Georgian times, including Victorian, Edwardian and more contemporary assets reflecting the distinctiveness of Tooting's history and built heritage.</p>	<p>The Council's Corporate Business Strategy and the Local Implementation Plan set out specific ways the Council will encourage and improve cycling. A Walking and Cycling Strategy for Wandsworth has also been produced which provides more detail. London Plan Policies are considered along with Local Plan Policies as part of the development process.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Riccardo Composto	Tooting Healthy Streets			1279	8.11	<p>8.11</p> <p>The vision misses reference to improving air quality, increased and improved public spaces, the need for greening large parts of the town centre and delivery of the WESS in light of the climate emergency declared unanimously by Members in 2019.</p> <p>The reference to 'improve opportunities for active travel' should be made more ambitious, in line with the council's own language about its emerging Walking and Cycling Strategy, e.g.: 'Make walking and cycling in Tooting safe and inclusive and normalise cycling as an everyday way to get around.'</p>	LP10 and LP14 sets out the policies for the Council to tackle Climate Change and air quality. LP59 Urban Greening Factor and LP20 New Open Spaces set out the requirements for new green infrastructure for all new developments. The Council's Corporate Business Strategy and the Local Implementation Plan set out specific ways the Council will encourage and improve cycling. A Walking and Cycling Strategy for Wandsworth has also been produced which provides more detail.	No change to the Local Plan required as a result of this representation.
Laura Hutson	Sport England			133	8.12	I note there is no inclusion of the Springfield hospital site. I am aware that the planning permission for this site is currently being implemented. I would remind the Council that this site formerly included a formal sport facility, and the appeal was allowed on the basis that the site would include both 'active and passive sports', it is important to Sport England that a portion of the site is allocated for formal sport. I understand the applicant is currently carrying out a study via a consultancy to determine the most appropriate sports provision for this site. Sport England, NGBs and local clubs would all derive significant comfort from the allocation of a portion of the site for formal sport.	Comment noted.	The Springfield Hospital site has been added to the list of site allocations.
Dr Samuel Clifford				578	8.12	Care should be taken to ensure that redevelopment of Tooting's indoor markets do not compromise the ability of stall-holders to continue operating. This has been a big issue at Elephant and Castle.	<p>Comments noted. The Site Allocation sets out that the development must include the retention or re-provision of the market, and it is essential that as part of this the ability of traders to operate is not negatively affected. Policy LP 49 (Markets) sets out further detail on planning applications relating to markets, which would apply were one to come forward for this site. Changes have been proposed to LP 49 to clarify that planning permission as part of the redevelopment of a market will be subject to the operation of the existing market being ensured. In line with these changes, it is considered appropriate to clarify this within the text of the Site Allocation TO1 also.</p> <p>To note, a number of other policies within the Local Plan also require that the operational ability of existing or new businesses (including those unrelated to markets) is not compromised as a result of planning permission, as set out in LP 2 (General Development Principles) and LP 40 (Requirements for New Economic Development).</p>	Amend 'Uses' under the Development Considerations to state clearly that the operation of the market must not be negatively affected as part of any redevelopment. It should also be clarified that re-provision of the market is acceptable (alongside retention).
Libby Lawson	Tooting History Group			413	8.12	Within the market area is the former Defoe Chapel at 19 Tooting High Street, a locally listed building dating back to 1776; one of Tooting's oldest surviving buildings and significant in Tooting's history. We feel it is essential that any future development includes the retention of this building; it is an attractive red brick building with pediment and arched windows and a positive contribution to the street scene and presenting no challenge to the scale and type of development proposed; it is already retail on the ground floor and residential accommodation in subsequent storeys.	The Council's approach to the retention of listed or locally listed buildings is outlined in LP3 Historic Environment and is not repeated in each site allocation.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			719	8.12	<p>TfL welcomes the proposal for contributions towards bus service improvements and the requirement to provide much needed bus terminating and standing facilities (which should include drivers' facilities as part of any redevelopment). Early dialogue with TfL is advised to ensure that any provision meets operational needs.</p> <p>However, the suggested provision of car parking is not justified because the area is already congested, with high levels of pollutants generated by traffic. Parking would take up additional, valuable development space and there are other parking alternatives nearby. Any development should be car free to take advantage of the high PTAL and the opportunities for active travel. In this context, local cycle route improvements would be welcomed.</p>	Agreed, the high PTAL score along with the future possibility of a Crossrail 2 link at Tooting Broadway means that the area is, and will continue to be, well connected. Providing additional car-parking is likely to be unnecessary, especially considering the current congestion and Air Quality Focus Area designation. Support for bus service improvements is noted.	The need to consider short term parking provision has been removed from the parking paragraph.
Mr James Murphy				92	8.16	This is a fantastic idea!	Comments noted.	No change to the Local Plan required as a result of this representation.
Dr Samuel				579	8.16	These public spaces must feel like they are accessible to the public without having to purchase anything at the markets. Otherwise they risk becoming de facto beer gardens for cafes/bars/restaurants that put exclusionary pressure on members of the community.	Comments noted. In the 'address social, economic, and environmental disparities' paragraph, it is stated that any new development should create 'appropriately accessible environments'. Since these two spaces are envisioned to be public spaces, this will mean maintaining public access.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Clifford								
	Wandsworth Cycling (London Cycling Campaign)			220	8.18	required, including improving safety on Mitcham Road	Comments noted.	No change to the Local Plan required as a result of this representation.
Riccardo Composto	Tooting Healthy Streets			1282	8.18	See attachment for representation  <b>8.18 Active Travel</b>  This should include sufficient provision of cycle parking for the full range of relevant uses, e.g. short stay/visitor, workplace and residential cycle storage as well as catering for different types of cycles including adapted and cargo cycles.	LP53 Parking, Servicing and Car Free Development outlines the council's position on cycle parking and cycling parking infrastructure.	No change to the Local Plan required as a result of this representation.
Dr Samuel Clifford				580	8.19	No parking should be provided on A24 through this area, so as to not interrupt the safe cycling usage of CS7. Any new visitor parking to facilitate shoppers should come at the expense of resident parking, in order to discourage local car ownership in an area which is very well served by public transport.	LP53 Parking, Servicing and Car Free Development outlines the council's position on cycle parking and cycling parking infrastructure.	No change to the Local Plan required as a result of this representation.
Riccardo Composto	Tooting Healthy Streets			1283	8.19	See attachment for representation  <b>8.19 Parking</b> 'additional short-term parking for shoppers in the town centre should be considered'  We object to this and ask if it is compliant with London Plan Policy T6 Parking. Tooting Town Centre has short stay meter parking on every street as well as a large and underutilised public car park at Sainsbury's. Given the acknowledged problems with motor traffic and pollution as well as the excellent public transport accessibility, this development should not be seeking to provide further short stay parking.	Comments noted. LP53 Parking, Servicing and Car Free Development sets out the Council's position on parking.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			720	8.27	Any development should be car free and the re-provision of hospital car parking should be limited to operational needs and Blue Badge car parking.	LP53 Parking, Servicing and Car Free Development outlines the council's position on cycle parking and cycling parking infrastructure.	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	878	8.29	<b>See full representation attached to comment 877</b>  <b>The Trust's Comments</b>  The precise amount of land will depend on the outcome of the Estate Strategy and at this stage it appears that there may be additional area available for development.  <b>Suggested Amendments</b>  Site Area – 2.8ha up to 4.8ha, subject to outcome of Estate Strategy	Comments noted.	The Site Allocation has been amended to include the entire Hospital and the site area will be amended to 15ha (confirm size)
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	879	8.30	<b>See full representation attached to comment 877</b>  <b>The Trust's Comments</b>  The Trust supports non-hospital uses provided that the hospital and its future improvement is not prejudiced. Such uses could help to fund the improvement of the hospital and it is likely that the Trust would only bring forward development that would satisfy that aim.  The Council ought to recognise that re-provision of existing hospital floorspace may well be achieved in a more efficient manner and not on a like-for-like floorspace basis.	The site allocation has been expanded to cover the whole site, which will give the hospital more flexibility in delivering its estate strategy. The wording of the policy has also been changed to clarify that non-medical uses are suitable as long as they do not prejudice the estate strategy. The wording surrounding 'on-site medical uses' is considered appropriate because it contains ample scope for services to be provided elsewhere as long as this is justified. It gives the power to the NHS Estates Strategy to dictate what needs to be provided on site.	The site is suitable for hospital-related uses, and residential uses that do not prejudice the delivery of the NHS Estates Strategy. Any proposal that results in the loss of staff accommodation will need to ensure it is re-provided. Existing on-site medical uses must be re-provided on-site unless it can be demonstrated that there is justification for loss or off-site provision in accordance with the NHS Estates Strategy.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Given the fluid nature of healthcare provision, current 'on-site medical uses' might be delivered from other sites (e.g. in community settings) or by other means in the future. The wording of the policy should be allowed for such change and be focused on facilitating the delivery of the Estate Strategy rather than a like-for-like replacement of floorspace.</p> <p><b>Suggested Amendments</b></p> <p>Uses – The site is suitable for hospital-related and residential uses <u>which could help to fund improvements to the hospital</u>. Any proposal that results in the loss of staff accommodation will need to ensure it is reprovided. Existing on-site medical uses must be reprovided on-site unless it can be demonstrated that there is justification for loss or off-site provision in accordance with the NHS Estates Strategy. It must be demonstrated that any proposal relating to nonhealthcare uses would not prejudice the role of the hospital or the delivery of the Trust's Estate Strategy.</p>		
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	880	8.31	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>Agree. The Trust also places importance on consultation with staff and service users and other hospital and healthcare stakeholders.</p> <p><b>Suggested Amendments</b></p> <p>Stakeholder Engagement – Development proposals should be prepared through a collaborative approach with engagement <del>from</del> <u>between</u> the <del>hospital</del> <u>Trust, staff and service users, healthcare stakeholders and the</u> local community.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	881	8.32	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>We assume that 'the public realm around the perimeter of the site' relates to land that is within the site and within the Trust's ownership; land outside of the site is not within the Trust's ownership and therefore improvement of this is beyond the control of the Trust.</p> <p>The Trust supports the improvement and creation of usable outdoor areas within the site. However, locating open space close to the main public entrance to the hospital may not be possible or desirable. The location of public open space should be informed by place-making principles and may, for example, be located to incorporate existing mature trees to enhance the space.</p> <p><b>Suggested Amendments</b></p> <p>Open Space - Opportunities to improve the public realm around the hospital perimeter should be explored including additional public art. A small pocket public space/parklet should be provided <del>at the main public entrance to the hospital</del> for visitors as well as staff. Hospital staff and patients should be consulted on the public art.</p>	<p>Agreed, the Trust is correct in assuming that the public realm improvements will occur on land within the Trust's ownership.</p> <p>Providing a piece of open space at the main entrance to the hospital would help to improve the legibility of the area and make the main entrance a more distinctive landmark. However, the council recognises that Trust is looking for as much flexibility as possible and this can be built into the site allocation.</p>	The site allocation's open space requirements have been amended.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	882	8.33	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>The site should not be classified as employment land.</p> <p>Any changes to access will need to accord with the Estate Strategy and in particular the need to maintain access for emergency vehicles.</p>	Comment noted. The latter point in the suggested amendment is already captured in LP54 Parking, Servicing and Car-Free Development.	The site allocation access requirement has been amended.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>If other uses are proposed, opportunities should be sought to improve access for pedestrians, cyclists and public transport users as part of a comprehensive approach to access.</p> <p><b>Suggested Amendments</b></p> <p>Access - Any proposal that will significantly alter access to the site or generate additional trips to the site will need to assess the impact to employment land and the additional medical capacity. Any proposal for nonmedical uses should (i) not make changes to any accesses that would be incompatible with the hospital Estate Strategy or adversely affect access to the site for emergency vehicles; and (ii) minimise the need to provide additional car parking (except for people with additional mobility needs) by prioritising active travel and the use of public transport.</p>		
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	883	8.34	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>The emerging Estate Strategy will include the aim of a more sustainable future for St George's. As well as considering the sustainability of buildings, opportunities will be explored to reduce nonessential car journeys. The provision of car parking will then be balanced against the need to optimise the use of previously-developed land on the site.</p> <p><b>Suggested Amendments</b></p> <p>Parking – Re-provision of car parking to serve the hospital site will be required. <u>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.</u></p>	Comments noted.	Site allocation has been amended to include proposed changes.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	884	8.35	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>These principles are generally supported. However, it should be noted that the arrangement indicated on 'Map 8.1 Tooting Spatial Area Map' is unlikely to be possible, for example the rectangular block to the immediate left of the 'suggested location for new public open space' would require the felling of mature trees and would be on a plot so narrow that it is unlikely to be capable of being serviced and accessed without disrupting the operations of the hospital. This matter is discussed under the heading 'Policies Map' above.</p> <p><b>Suggested Amendments</b></p> <p>No change</p>	Support noted. The urban blocks shown in map 8.1 are only suggested building frontages.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			221	8.36	Required	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	885	8.36	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>Outside of the site / routes beyond the site's boundary are not in the control of the Trust and therefore the creation of more space on these is beyond the control of the Trust. However, the Trust is keen to improve conditions for pedestrians on land within its control.</p>	Support for pedestrians is noted. The Local Plan is a holistic document, so proposals will naturally transcend administrative boundaries. The wording is considered largely appropriate, although the Trust's support for pedestrians on site could be noted.	The site allocation's movement requirements have been amended.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>Suggested Amendments</b></p> <p>Movement - Proposals will be expected to <del>create more space</del> <u>make suitable provision for pedestrians on the site, particularly to facilitate movement between</u> especially <del>on routes to</del> Tooting Broadway station and St George's Hospital.</p>		
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	886	8.37	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>Agreed – it is essential that new residential development does not become an 'agent of change' and that residential occupiers do not object to the operations of the hospital which are round-the-clock and can be intensive. The design and location of any new development should clearly demonstrate that the residential environment will be satisfactory without the hospital having to make changes to its operations. Such development should also take account of the Estate Strategy which may include healthcare buildings in different locations to existing.</p> <p><b>Suggested Amendments</b></p> <p>Context - Future redevelopment proposals will need to demonstrate how they successfully integrate new residential development with the existing hospital use on adjacent site <u>and should also take account of potential new hospital buildings as set out in the Estate Strategy.</u></p>	Agreed.	<p>Revise Design Requirements of Site Allocation TO2 as follows:</p> <p>Context - Future redevelopment proposals will need to demonstrate how they successfully integrate new residential development with the existing hospital use and should also take account of potential new hospital buildings as set out in the Estate Strategy.</p>
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	887	8.38	<p><b>See full representation attached to comment 877</b></p> <p><b>The Trust's Comments</b></p> <p>No comments</p> <p><b>Suggested Amendments</b></p> <p>No change</p>	Comments noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			721	8.39	<p>Any development should be car free and existing parking removed.</p> <p>Care will need to be taken with access to minimise the impact on bus stops/stands.</p>	LP53 Parking, Servicing and Car Free Development outlines the council's position on cycle parking and cycling parking infrastructure.	No change to the Local Plan required as a result of this representation.
Riccardo Composto	Tooting Healthy Streets			1284	8.43	<p>See attachment for representation</p> <p><b>8.43 Parking</b></p> <p>Servicing should take place in the parking and access to the west as per 8.42. Otherwise servicing from Garratt Lane would obstruct cycling on Garratt Lane - a planned WBC strategic cycleway currently being implemented in temporary form.</p>	LP53 Parking, Servicing and Car Free Development explains that off street servicing is preferred and for this site it would be in the car parking.	No change to the Local Plan required as a result of this representation.
Brendan Foley				565	8.48	<p>I live on Longley Road and I strongly disagree with the proposal on P397 Appendix 2 that Longley Road is a suitable location for tall buildings.</p> <p>Our road is a predominantly Victorian and Edwardian residential area – there are no tall buildings on Longley Road, certainly none taller than three storeys.</p> <p>To state that Longley Road is suitable for tall buildings is clearly completely against the design and character of our road.</p> <p>This proposed imposition will not benefit the residents or the people of the local area,</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Additionally, this area suffers from an absence of green space. The Longley road gardens provide needed open space for the residents, additionally they are home to an abundance of wildlife.</p> <p>With the ever-present pollution concerns the removal of green spaces and building of tall structures will increase pollution levels – this proposal should not be permitted to proceed</p>		
Riccardo Composto	Tooting Healthy Streets			1281	Figure 8.1	<p>See attachment for representation</p> <p><b>Map 8.1</b></p> <p>The map lacks detail and should include Tooting Bec. We suggest that for the next draft of the plan a more detailed spatial plan is included. It is not clear why there are 'active travel enhancement' arrows leading to Moffat Rd and Kellino St. We suggest that this map is updated in line with the Walking &amp; Cycling Strategy as it emerges, which should be ahead of the later versions of the Plan.</p>	Tooting Bec is not a Town Centre in Wandsworth and is not included in the Spatial Area Strategy.	The arrows on Moffat Street and Kelino Road have been removed from the Spatial Area Map.
Cllr Loveland	Labour Group			639	Map 8.1	<p>We welcome the recognition that investment to create a high-quality public realm is crucial to the future prosperity and vibrancy of Tooting. We are concerned that in Appendix 2 Tall Building Maps the map for Tooting shows land on the south side of Longley Road (in character area F2) as an area where there are opportunities for tall building within a local context. The predominant building scale along the entire length of Longley Road is two storeys with a handful of taller (3 and 4) insertions. This area should be removed from the map. We would also question why character area F2a is identified as being able to accommodate tall buildings, subject to context. Virtually the entire area is relatively recently built residential development and includes no obvious location where a taller building might be considered acceptable. This area should be removed from the map.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			<a href="#">1020</a>	Map 8.1	<p>Page 147 (Tooting Area Strategy Map) Our comments on the map divide into three topics- the neighbourhood plan area boundary, policy for Tooting Bec, and clarity on public realm interventions. a. Neighbourhood plan area boundary as noted previously, the neighbourhood plan boundary should be shown and used on the Area Strategy map, as this will help ensure effective dovetailing/complementarity between local and neighbourhood policies. The alternative is confusion to Plan users in terms of policy duplication/overlap. b. Need for Tooting Bec policy Tooting is not Tooting Broadway alone (hence the name of the Bec and Broadway Neighbourhood Forum). As such, and consistent with previous Local Plans, the Council needs to add place-specific policy for Tooting Bec within the Tooting Area Strategy over and above its designation elsewhere in the Plan as a Local Centre. This could either be added to policy PM6 or, better, form a new policy given the existing length of PM6. Tooting Bec is deserving of attention as a strong public transport hub benefitting from reasonable pedestrian footfall 11 <a href="https://www.standard.co.uk/news/london/tooting-named-one-of-the-10-coolest-neighbourhoods-on[1]earth-by-lonely-planet-a3618861.html">https://www.standard.co.uk/news/london/tooting-named-one-of-the-10-coolest-neighbourhoods-on[1]earth-by-lonely-planet-a3618861.html</a>10 with a character and identity similar to but different from neighbouring Balham and Tooting Broadway. The Trinity Road local centre around Tooting Bec Station is particularly important to address, being a high street that needed reinvigorating even before COVID-19. Broadening the focus of attention would not only enable the Council to address this struggling high street but also to reference and plan for improved public realm and the future effects of the Springfield development, including increased traffic and additional requirements for local services. It would be particularly useful in terms of Covid-19 response in this location for the Council to outline strategies to work with retail and hospitality business landlords to support small business units, by for example offering Council-supported short term lets for new businesses to help sustain the Council's stated ambition of a strong retail core, given that Tooting Bec has a poorer track record of retail failure/vacant units than does Tooting Broadway. Reinvigorating Tooting Bec would also entail making the Wheatsheaf/underground station crossroads more coherent and attractive by building on the improvements already made around the south side station exit. These could include extending and resurfacing the pavements around the Trinity Road exit and the Balham High Road/Tooting Bec Road corner/roadway; incentivising owners to improve the dilapidated appearance of many frontages (or, where opportunities exist, particularly on the west side of Balham High Road, encouraging them to bring forward underused and rundown buildings for sensitive redevelopment); and</p>	<p>The Tooting Bec and Broadway Neighbourhood Area is too large to fit onto the Spatial Area Strategy Map and a lot of detail would be lost.</p> <p>Tooting Bec is not a Town Centre so therefore it hasn't been included in the Spatial Area Strategies.</p> <p>Active Travel Enhancements and Suggested Public Realm Improvements are shown with separate colours on the map.</p> <p>The Corporate Business Plan and the Local Implementation plan identify as a key action that the Council will appoint a "healthy streets" champion that works to help reduce street clutter and create new pocket parks, as part of a total safety approach. These documents also consider road casualties and how best it be managed.</p> <p>The Spatial Area maps do not include transport network improvements.</p> <p>The new routes through the Markets will be open to pedestrian traffic and made publicly accessible.</p>	The arrows on Moffat Street and Kelino Road have been removed from the Spatial Area Map.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>further pavement decluttering. The Forum understands that a TfL town centre plan intended to improve both this, and Tooting Broadway junctions is in the pipeline. It should be referenced in the draft Plan in the interests of joined-up planning, particularly its statement that 'both the Tooting Bec and Tooting Broadway junctions will be redesigned with a view to providing segregation between cyclists and general traffic in addition to pedestrian improvements.' c. Lack of clarity on public realm interventions Any and all interventions to improve the public realm and increase active travel are supported in principle. However:</p> <ul style="list-style-type: none"> <li>• It is not clear from the map whether public realm improvements overlap with the active travel enhancement along the four main roads (the colours used for each are not easy to distinguish). If not, they should. Alternative colours should be used so the map is clearer. Public realm improvements should entail decluttering of Tooting's multiplicity of street obstacles, specifically derelict phone booths, freestanding (but unused) cashpoints, street railings and so on. • Such interventions are particularly necessary on Tooting High Street and Mitcham Road close to the Tooting Broadway junction. Ironically, both Pictures 8.1 and 8.2 of the emerging Local Plan clearly illustrate locations where decluttering is needed- in 8.1 the free-standing cashpoint acting as a significant bottleneck at the main entrance of Tooting Market (not needed anyway as surrounded by free-to-use bank ATMs), and in 8.2 the street railings (note also motorcycle parked illegally on the pavement, which is not uncommon). • The map appears to show suggested public realm improvements along Kellino Street and Moffat Road. Again, while these are welcome in principle, the reasons why these two streets have been selected is not stated in the text and neither of these two streets appear to need any more attention than the many parallel streets not selected for such improvements. This needs explanation.11</li> <li>• Improvement of bus standing facilities is mentioned in the Tooting Area Priorities, but no interventions are shown for the bus stand at Longmead/Ashvale Roads, which could be improved, as mentioned in our comments on Policy PM6 (it is in a residential area, and is noisy, polluted and pedestrian-unfriendly). • It is hoped/assumed that the suggested/proposed new routes through the Markets will not be new streets open to traffic, but this is not definitively stated- clarity is needed. If this is the intention, this would be strongly opposed.</li> </ul>		
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1021	Map 8.2	<p>Site Allocations- TO1 Market Area, Tooting High Street, Tooting SW17 Site Description: The locally-listed Defoe Chapel at 19 Tooting High Street (built 1776) is within the red-line boundary so should be mentioned as part of the historic environment to be retained in any future development in this location. This would complement the tight knit small scale retail development proposed for the markets area and ensure this text is consistent with Policy PM6 Placemaking H. Development Considerations- Access and Design Requirements-Movement: the nature of the accesses proposed is not clear and needs further detail. Confirmation is needed that the new routes proposed will be pedestrian and/or cycle only rather than new roads with car access. If they are to be both pedestrian and cycle, how will these modes be segregated? Related to this point, Map 8.2 should show at a more detailed scale the indicative routes through the development shown on the Page 147 map. Parking: there are few more suitable locations in Wandsworth, or indeed in London, for car[1]free development than here (with an obvious exception for disabled parking). The current approach to parking does not conform with London Plan Policy T6 part B, which states that 'car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. Car-free development has no general parking but should still provide disabled persons parking'. On the frankly astonishing suggestion that 'the provision for additional short-term parking for shoppers in the town centre should be considered', extensive (and underused) low-tariff parking for shoppers has already been made available for many years in nearby residential streets. Providing further parking would exacerbate existing traffic congestion and pollution and would undermine the Council's active travel targets and climate emergency declaration/WESS. It would also be contrary to London plan Policy T6 Part A, which states that 'car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.' In short, providing more parking would be completely at cross[1]purposes to the Council's and Mayor's stated policy objectives. Public Transport: More site-specific clarity is needed, particularly on whether the bus service enhancements relate to the existing bus stand at Longmead/Ashvale Road or not. The Forum would like to ensure that market redevelopment secures much-needed improvements to this facility, which has a significant negative impact on the town centre public realm, air quality, pedestrian amenity and environment. As such, one or both of the sitemaps</p>	<p>The Site Allocation provides guidance regarding access requirements and does not need to be more detailed.</p> <p>The segregation of the active travel routes will be decided on a case by case basis.</p> <p>LP53 Parking, Servicing and Car Free Development has been updated to conform with the London Plan.</p> <p>The public transport guidance is considered to be sufficiently detailed.</p> <p>The approach to the retention of listed or locally listed buildings is outlined in LP3 Historic Environment and is not repeated in each site allocation.</p> <p>The routes through the site are proposed/ suggested and subject to change with a planning application.</p> <p>The public transport development consideration is considered sufficiently specific.</p> <p>When Crossrail 2 is considered to be progressing sufficiently changes to the bus standing facilities will be considered.</p>	<p>The Tooting Spatial Area Map has been updated to show that the routes through the Markets will be pedestrian.</p> <p>The requirement for short term parking provision has been removed</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						need to indicate where the public transport infrastructure improvements will be delivered, and ideally this should be at the bus stand in question. In the longer term, the Forum would strongly support options to design out the bus stand altogether, subject to bus operational requirements, and replace it with a new public space with trees. This option has been publicly explored by TfL as part of Crossrail delivery, and would of course align with retail core strengthening, public realm objectives and tourism aspirations, so there is good reason for it to be mentioned in the Plan.12 Address social, economic and environmental disparities: measures to design out crime would also be enhanced by providing a car-free development because this would allow for natural surveillance, i.e. 'eyes on the street'. Despite the stated aim to address environmental disparities, there is nothing in this section about the new development responding to the climate emergency declaration, the WESS or the London Plan decarbonisation agenda. Identity and Architectural Expression: the aim of a 'tight-knit' development is supported and again, this would be facilitated by eliminating or reducing space needed for parking cars.		
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1022	Map 8.4	TO3 50-56 Tooting High Street, Tooting, SW17 Access: there are few more suitable locations in Wandsworth, or indeed in London, for car[1]free development than here (with an obvious exception for disabled parking). The current approach to parking does not conform with London Plan Policy T6 part B, which states that 'car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. Car-free development has no general parking but should still provide disabled persons parking'. Extensive parking is already available in nearby side roads and providing further parking would undermine the Council's active travel targets and climate emergency declaration/WESS. In short, providing more parking is completely at cross-purposes to the Council's and Mayor's environmental objectives. Reducing space for parking would make economic sense as well, because further residential or retail space could occupy the current parking area. Identity and Architectural Expression: this text could and should be less generic and more site specific given how important and visible this site is as a landmark corner at the very heart of Tooting (it's part of the 'shop window' for town centre investment) and what an eyesore the site is at present.. Text could be added along the lines of e.g. 'the site has for many years been occupied by poor-quality modern development that does not respond to its context. Redevelopment should fit much more appropriately in terms of height, building materials and features with nearby locally-listed buildings, including the red-brick 48 Tooting High Street across Garratt Lane to the north, and number 69 diagonally opposite. The sense of place is completed by the Grade 2 listed Tooting Broadway station on the fourth corner, so redevelopment is an unmissable opportunity for all corners of the junction to form a single beautiful place'.	Comment noted. Off-street servicing is considered a requirement for the site.  It is agreed that Site Allocation TO3 should emphasise that the scale and massing of the development should relate satisfactorily to the character of the surrounding area, including adjacent heritage assets.	The site allocations context requirements have been amended.
Dr John Fletcher				537	Picture 8.1	Picture 8.1 really sums up the built environment for pedestrians; a market stall on the street (I do love those guys mind & the whole pound a bowl), a smashed up cash machine blocking off half the pavement, a bus line with parking spaces and a pedestrian island because we're not allowed to cross the whole road in one go.	Comment noted.	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	877	Picture 8.1	<b>See full representation attached to comment</b>  Policies Map / Map 8.1 Tooting Spatial Area Map  In the draft Local Plan Map 8.1 shows an area of land amounting to approximately 2.8 hectares and  illustrates how potential residential development could be laid out. The Trust supports land being  identified for development but, having studied the proposed extent of the allocation as part of the  Estate Strategy work, it makes the following comments:  <ul style="list-style-type: none"> <li>The amount of land that has been identified for potential development is realistic albeit current Estate Strategy work indicates that a greater</li> </ul>	Comment noted.	The Site Allocation has been amended to include the entire Hospital.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>amount of land could be released if hospital buildings are re-arranged.</p> <ul style="list-style-type: none"> <li>If the area that is identified on Map 8.1 is developed for residential use, it could reduce the flexibility to implement the Estate Strategy whether in terms of the location of new hospital buildings or re-aligned internal roads and accesses.</li> <li>Some of the land that has been identified is unlikely to be suitable for development because of existing constraints such as trees or because the land parcel would be too narrow to accommodate both development and sufficient land for servicing (e.g. refuse vehicles so that these would not block the flow of traffic within the hospital site).</li> </ul> <p>On that basis the Trust advocates an alternative approach whereby the whole of the site is allocated for development. The allocation should set out the expectation that the major healthcare facility will remain, that new healthcare development will be supported in principle, and that subject to it being demonstrated that it would not prejudice the future operation or redevelopment of the hospital (a consideration to be assessed in the context of the agreed Estate Strategy), up to 4.8 ha of land within the site could be used for residential use.</p> <p>We consider that such an approach would give the Council the comfort that the major hospital will remain, that there will be sufficient flexibility to effect major improvements to the hospital, and that surplus land can still make a material contribution towards the pressing need for new homes in the borough.</p> <p>A precedent for this approach is the current allocation for the Springfield Hospital site (9.1 in the 2016 Site Specific Allocations Document) which covers the whole of the site rather than just the area that could be developed for housing. On the following page we illustrate the area that we suggest being allocated.</p>		
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1012	Picture 8.1	Figure 8.1 We support in principle the 'place based approach' to the Area Strategy and welcome the three overlapping themes of people first, placemaking and smart growth. However, in line with our strategic comments above, the climate emergency needs to be a key theme here, otherwise the declaration becomes meaningless because it does not flow through to real-world policy implementation. This comment applies, of course, to all other Area Strategies as well.	Comment noted.	No change to the Local Plan required as a result of this representation.
Dr John Fletcher				541	Picture 8.2	Mitcham Road has very wide pavements and yet there is no room for segregated cycle paths?	PM6 People First B shows the council's support for cycle lanes throughout Tooting.	No change to the Local Plan required as a result of this representation.
Mr James Murphy				91	Policy PM6	<p>Tooting suffers from a huge amount of broken and redundant street furniture which makes social distancing hard in the current climate and hinders those with a disability. There should be a full audit ASAP which aims to remove:</p> <ul style="list-style-type: none"> <li>Unnecessary signage – dozens of poles contain no sign!</li> <li>Unnecessary phone boxes – the council should work with BT to remove. There are around 8 broken phone boxes within a 2 min walk of Tooting Broadway tube. Many narrow the pavement including the two outside Sainsbury's which are particularly problematic currently with queuing.</li> </ul> <p>Additionally, pavements across Tooting are in a shocking state of repair – many are dangerous with loose slabs and flood regularly. The stretch from Amen Corner to Tooting Broadway tube is particularly poor with sunken sections.</p>	Policy PM6 states the following: 'Measures to provide new planting, modernise street furniture and declutter Tooting High Street and Mitcham Road will be supported. Where appropriate, development proposals should make provision for new street trees.' This addresses the issue raised.	No change to the Local Plan required as a result of this representation.
Dr John Fletcher				542	Policy PM6	It is difficult to square the notes on the air pollution on the A24, the statements below and the current administration's view on CS7:	There has been considerable concern about the cycle facilities on the A24 being rushed and adding to congestion and pollution rather than improving them. The Council would welcome a well designed and consulted upon improvement for the A24, indeed there was one planned prior to COVID.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<a href="https://www.wandsworthconservatives.co.uk/news/tfl-withdraw-urgently-needed-cs7-consultation">https://www.wandsworthconservatives.co.uk/news/tfl-withdraw-urgently-needed-cs7-consultation</a>		
Cllr. Paul White				672	Policy PM6	Local health and educational establishments (for instance) in Tooting will always require a good supply of low cost, good quality rental accommodation and developments must stick closely to the London (and this) Plan, regarding social and affordable numbers, with this being prioritised. Roadside and pollution absorbing "greening" can positively affect anti-social behaviour and well-being. Tooting is very "grey" and the addition of trees, hedges, shrubs is likely to have a positive effect on behaviours, pollution and greenhouse gases on main roads and quantities need to be increased. Affordable and sustainable car club parking spaces should be increased to assist a modal switch away from car ownership and less local car miles, thus reducing pollution and climate change gases. Pro-active campaigns around health, affordability, well-being, sociability, climate change, air quality, behaviour and street scenes should be used in pursuit of this goal. Adhoc green spaces should be encouraged and increased in the not so green areas, especially around Tooting Broadway. Parks, parklets, trees, shrubs, green walls, planters and other green architecture should be introduced where space allows, working with community groups where possible to increase a sense of ownership. Tooting's tube stations and St Georges and Springfield Hospitals should be examined for district heating possibilities, where the huge heat demand for all of these facilities might be recycled for internal or external use.	Comment noted.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			718	Policy PM6	Given the high PTAL, opportunities for active travel and its designation as an Air Quality Focus Area, all residential and office development should be car free. This should be clearly expressed in policy PM6 and emphasised in all site allocations.  TfL welcomes measures to improve bus speeds and bus standing facilities as well as improvements to Cycle Superhighway 7 and other cycle lanes.  Widened pavements and traffic management measures to reduce the dominance of cars and improve opportunities for active travel are also welcomed.	LP53 Parking, Servicing and Car Free Development outlines the council's position on cycle parking and cycling parking infrastructure.	No change to the Local Plan required as a result of this representation.
Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1018	Policy PM6	Policy PM6: Most importantly, it is essential to strengthen this draft policy by incorporating some of the issues noted above, even if this means it will need to be split into two or more policies. Our comments on the existing text are as follows: <ul style="list-style-type: none"> <li>Placemaking A point 3 ('reinforce the function of the streetscape as a shopping and leisure destination')- our general comments above requesting more detail throughout the Plan on recovery from COVID-19 are relevant here. Further supporting and policy text is needed to explain how this admirable ambition might actually be implemented in the current challenging context, both in Tooting and in the other town centres.</li> <li>A point 4 should be added to Placemaking A as follows: 'contribute to the take-up of active travel and, where possible, reduce the impact of the private car'.</li> <li>Placemaking D could encourage or even require the restoration of historic shopfronts where they have been lost, alongside retaining existing. Much of Tooting's sense of place has been eroded through intrusive and extensive modern shopfronts and signage, and this has not been sufficiently acknowledged.</li> <li>Placemaking E would be stronger if reworded as 'Development proposals for upward extensions should maintain and where possible enhance the appearance of the building facades.' • Placemaking F should state that new street trees, while supported, should not form further obstacles to pedestrian movement and/or social distancing. The fact that Tooting High Street is mentioned as a candidate for decluttering is very welcome- for the avoidance of doubt, it should perhaps be clarified that decluttering is needed both north and south of the Broadway junction. Note also that Mitcham Road just east of the Broadway Junction is probably even more cluttered than Tooting High Street, so should also be mentioned. This clause and the</li> </ul>	The Local Plan should rightly address of the impact of the Coronavirus pandemic, and seeks to do so. That notwithstanding, the Council's position is that limited data exists on the longer-term impact of the pandemic; indeed, at the time of writing we are still all subject to restrictions on the operation of everyday and public life. The Local Plan concerns the longer-term, setting out a development strategy for a period of 15 years (over which we anticipate - and hope - that there will be something of a return to normality!), however such documents are typically reviewed on a c. 5 year period (the last update to Wandsworth's Local Plan was adopted in 2018), with the production of the evidence base which supports the Plan begun in the earlier years of that timeframe. Opportunities to carefully consider and address the longer-term implications of the coronavirus pandemic will therefore be afforded in the future, when we will be in a better position to understand its fuller implications. To note, however, that the Local Plan does introduce a number of changes which respond both to longer-term structural changes in the retail sector, as well as to legislation that the Government has introduced which is specifically intended to assist with recovery from the pandemic (namely through the introduction of Class E), and the Local Plan now permits much greater flexibility of use in its designated Core and Secondary frontages, which should help to prevent vacancies in retail premises. The inclusion of the requirement set out within PM6 Placemaking A, that new development should reinforce the function of the streetscape as a retail and leisure destination, seeks to supplement that policy position with specific guidance relating to these highly valued features of Tooting. It is however agreed that Part A.1.C of policy PM6 should provide more clarify how this ambition will be implemented.  LP51 Sustainable Transport articulates the active travel point and without specifics to Tooting would be redundant.  Policy LP8 states that proposals for shopfronts will be required to retain shopfronts of architectural or historic interest or any features of interest that survive on the premises (including historic shop signage), particularly where these make a positive contribution to the distinctive visual or historic character of a building, townscape or area. Such shopfronts or features should be retained,	Expand Part A.1.C of policy PM6 to emphasise that development proposals will be expected to maximise the provision of active ground floor uses on sites facing main pedestrian routes.  Amend Part A.4 of policy PM6 to state that development proposals for upward extensions should respect and where possible enhance the appearance of the building facades.  Expand Part A.5 to emphasise that measures to provide new planting, modernise street furniture and declutter should also be applied to Mitcham Road.  Add indicative capacity figures to all Site Allocations.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>decluttering proposals in general may need further detail to maximise alignment with London Plan Policy SD6 part H.</p> <ul style="list-style-type: none"> <li>Placemaking G could add the word 'historic' before the word 'pubs'. Not all pubs in Tooting enhance its appearance, though many do. • Smart Growth A 'Provide at least 820 homes between 2023 and 2038, in addition to those already completed and those which will be completed prior to 2023'. This is a significant number for Tooting to support and given the lack of large-scale development opportunities may imply a tall buildings response which might erode the 'human scale' urban grain the plan rightly notes as an important component of Tooting's sense of place. Further detail of where the new homes will be developed is required to gain local support- it is, for example, surprising that no residential capacities, even indicative, have been provided for each of the site allocations TO1-TO3. These would be easy to provide through simple urban design modelling and would significantly improve the clarity and transparency of the Area Strategy. Most importantly, they would empower the Council to refuse development applications that do not accord with them, as set out in London Plan Policy D3 Part C. For all of these reasons, the Forum requests that these are added to the next iteration of the Plan, even if only indicative figures. • Smart Growth E: The development of a tourism strategy for the area is welcomed. However, this point is made for the first time only in the policy itself, i.e. is not justified or given context in the supporting text. This needs to be remedied in the next version of the Plan. Significant evidence suggests that it could and should be widened to a 'tourism and cultural strategy, to recognise better how Tooting's vibrant culture and its interesting cultural history are critical to its visitor offer. For example, Tooting was once home to as many as seven cinemas, including Britain's first-ever purpose-built venue. Summerstown boasts a thriving community local history project<sup>10</sup> and in 2017 Tooting <p><sup>10</sup> <a href="https://summerstown182.wordpress.com/9">https://summerstown182.wordpress.com/9</a> was named one of the ten coolest places on Earth by Lonely Planet travel guides, thanks to its 'multiculturalism and originality.'<sup>11</sup> In developing any tourism and cultural strategy, we thus also urge the Council to consider the Forum's characterisation study, including its community surveys and the evidence on opportunities for new commercial cultural life. The study is backed by extensive local consultation, and one of the top responses to the question 'What Does Tooting Need?' was 'more cultural spaces'. As a final point, in terms of promoting tourism, supporting local businesses and the local cultural sector, the street scene comments made above will have very significant positive effects on these objectives, and in this sense will 'pay for themselves' in due course. It is therefore suggested that words are added as follows: 'We will support proposals to develop a tourism and cultural strategy for the area that supports local businesses and the local cultural sector including through public realm improvements that significantly improve its attractiveness and walkability'.</p> <ul style="list-style-type: none"> <li>People First A: Improvement of bus standing facilities is mentioned, but no interventions are indicated for the bus stand at Longmead/Ashvale Roads, which is in a residential area, and is noisy, polluted and dangerous for pedestrians. Specific proposals for Longmead/Ashvale Roads should be developed and added to policy (see our detailed comments below).</li> </ul> <p>People First C: These proposals are very strongly supported and have been needed for many years. Until such measures are implemented, Tooting will punch below its weight in terms of tourism, retail and entertainment, simply because the currently poor street scene and traffic dominance is one of the most noticeable elements of Tooting Town Centre for visitors and potential investors, thus acting as a brake on ambition and perpetuating the local deprivation that makes Tooting a Strategic Area for Regeneration. The traffic reduction and modal shift measures employed by Waltham Forest and TfL in Walthamstow, very similar in age, layout and character to Tooting, should be used to inspire what might be possible here.</p> </li></ul>	<p>refurbished and sympathetically incorporated into any new proposal.</p> <p>It is agreed that Part A.4 of policy PM6 could be amended as suggested.</p> <p>It is agreed that measures to provide new planting, modernise street furniture and declutter should also be applied to Mitcham Road. Where development proposals make provision for new street trees, proposals will be assessed against other relevant policies in the Local Plan. This will include the consideration of the impact of the proposal on the free flow of pedestrians.</p> <p>The wording of Part A.6 of policy PM6 is considered appropriate.</p> <p>It is agreed that indicative capacity figures should be added to all Site Allocations.</p> <p>Improvements to the bus standing facilities would be considered with any redevelopment of the Tooting Market site allocation.</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Riccardo Composto	Tooting Healthy Streets			1280	Policy PM6	<p>See attachment for representation</p> <p><b>Policy PM6</b></p> <p><b>Placemaking</b></p> <p>This misses reference to opportunities for additional public space, place space and greenery, which are all lacking in the town centre. Support for pocket parks should be explicitly referenced here due to the constraints on the built environment (such as the Graveney Pocket Park, which is currently under construction).</p> <ol style="list-style-type: none"> <li>1. 'Measures to provide new planting, modernise street furniture and declutter Tooting High Street will be supported. Where appropriate, development proposals should make provision for new street trees.'</li> </ol> <p>We strongly support this but suggest adding 'seating and places of shade and shelter'. It should reference Mitcham Road as well as Tooting High Street as they suffer the same problems. Additional street furniture such as cycle parking and electric car charging points should be provided in the carriageway wherever possible (e.g. replacing side street parking bays) rather than obstructing the footway.</p> <p><b>People First</b></p> <ol style="list-style-type: none"> <li>1. We support the expectation for servicing and loading to be off-street or on side roads but suggest adding 'and enable better cycling provision' to the points about reducing congestion and improving bus speeds. We also support the encouragement of better bus facilities and more pedestrian space.</li> <li>2. 'To facilitate this modal shift, permanent improvements to Cycle Superhighway 7 on A24 corridor and other local cycle lanes will be supported': We support this but there should be specific reference made here to the major cycleway WBC is planning for Garratt Lane, from Tooting Broadway to Wandsworth Town. This is a high priority route in TfL's Strategic Cycling Analysis and deserves specific recognition in the Plan. This section should also include reference to reducing back-street traffic to improve active travel conditions and ensuring there are sufficient safe crossings of main roads for people walking and cycling.</li> </ol> <p>We support this but ask for addition of 'and the surrounding minor roads impacted by very high levels of through traffic' to the reference to Upper Tooting Road - Garratt Lane - Mitcham Road, and specific reference to LTNs as part of the toolkit for tackling through traffic and creating good conditions for walking and cycling</p>	<p>Comment noted.</p> <p>The inclusion of different open space uses will be considered by development management when an application is submitted.</p> <p>The Council is still considering what traffic calming measure should be used in Tooting.</p>	<p>Reference to Mitchem Road has been included.</p> <p>The placemaking policy has been updated.</p>
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1521	Policy PM6	<p>PM6 Tooting</p> <p>The policy expects that at least 820 homes will be delivered by 2037/38. Site allocation TO2 St Georges Hospital Car Park and adjoining land on Blackshaw Road, proposes mixed use development including residential and expansion of healthcare facilities. We note the representations made by St George's University Hospitals NHS Foundation Trust and agree that the redevelopment of the land is subject to an approved Estates Strategy. We support the alternative proposal suggested by the Trust that the whole hospital site is allocated for development which would provide a more flexible approach to ensure that appropriate land is retained for improved hospital facilities and allocated for residential use in a phased manner.</p>	<p>Comments noted</p>	<p>The Site Allocation has been amended to include the entire Hospital.</p>



## Chapter 9 - Area Strategy for Roehampton and Alton Estate Regeneration Area

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Miriam Howitt				109	General Roehampton Area Strategy Comment	<p>Where Roehampton is concerned, particularly the Alton Estate, I differ from Cllr. Ravi Govindia's view and give my opinion as a resident who will be affected by it, as will many of my friends and all the other residents, and as a dispassionate professional. As none of the Councillors live on the Alton Estate and most not in our Ward or even Roehampton at all, I hope they will listen thoughtfully and not just support Ravi Govindia and Conservative Party Political diktat, as they did in granting Planning Approval</p> <p>Apart from finding fault with Redrow's scheme, it would have been horrendously expensive in upkeep, which the Council should take into account on their rate payers behalf.</p>	Comment noted	No change to the Local Plan required as a result of this representation.
Miriam Howitt				126	9.1	9.1 The Area Strategy for Roehampton is reasonable, but depends entirely on its interpretation. Wandsworth Council continues to promote Redrow's proposal despite the Comments on Planning Application 2019/2516 enumerating its significant failings. An increase of 2-3000 residents without appropriate infrastructure is intolerable. (see Points 2.24 and 2.86 above)	Comment noted. Policy PM7 (People First) lays out the Council's support for improving all modes of transport within Roehampton, with a particular focus on active and public transport.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			560	General Roehampton Area Strategy Comment	<p>The proposed regeneration of the Alton Estate, through the mass demolition of 300 homes across multiple buildings, is not consistent with this objective of 'reducing carbon dioxide emissions'.</p> <p>It is also contrary to Wandsworth Council's own Environmental &amp; Sustainability Strategy (WESS), which aims to reach net zero emissions by 2050.</p>	In order to maximise the density of the site it has been necessary to demolish and rebuild. The masterplan has allowed the site to provide a mix of affordable homes and private dwellings alongside consolidated state of the art community facilities that deliver services directly to the local community. Enhancements to health and wellbeing through improved healthcare provision, well designed spaces to relax and socialise and areas for play and activity to promote fitness and flexible office floorspace.	No change to the Local Plan required as a result of this representation.
Steve Fannon				894	9.1	<p>An explanation of how this will address the travel situation for residents would be appreciated.</p> <p>The proposed Block A will bring together Alton East and Alton West, rather it will be the dividing the estates. The area to be demolished will be subject to a separate estate charge meaning that the current estate service charge which covers both the Alton East and Alton West will be no more.</p>	Comment noted. This is set out in the Area Strategy and relevant Site Allocation.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			551	9.2	<p>Regarding the comment of 'higher than average crime levels', this needs to be backed up by evidence if it is to be included.</p> <p>According to <a href="https://www.met.police.uk/a/your-area/met/wandsworth/roehampton/">https://www.met.police.uk/a/your-area/met/wandsworth/roehampton/</a> the top-level crime figure for Roehampton was lower than the London average and on par with Wandsworth suggesting that the crime figures are not 'higher than average'.</p>	The statement relating to higher than average crime levels has been backed up by Indices of Deprivation 2019 data. It can be accessed by following this link: <a href="https://dclgapps.communities.gov.uk/imd/iod_index.html#">https://dclgapps.communities.gov.uk/imd/iod_index.html#</a>	No change to the Local Plan required as a result of this representation.
Steve Fannon				895	9.2	<p><b>See attachment for diagram on crime rate comparison</b></p> <p>Regarding "higher than average crime levels" this needs to be explained further. If I had more time to research I would be looking to provide an analysis of crime to provide with this document. In the meantime, according the top level crime figure for December 2020, for instance, the crime figure for Roehampton was lower than the London average and on par with Wandsworth as highlighted by the following screen shot which would mean, that at least from this perspective, the crime figures are not "higher than average".</p> <p>Source -<a href="https://www.met.police.uk/a/your-area/met/wandsworth/roehampton/">https://www.met.police.uk/a/your-area/met/wandsworth/roehampton/</a></p> <p>Within the SPD the focus for the area regarding crime was on 'violence against the person' and 'criminal damage incidents' as per the following extracts from the SPD:</p>	The statement relating to higher than average crime levels has been backed up by Indices of Deprivation 2019 data. It can be accessed by following this link: <a href="https://dclgapps.communities.gov.uk/imd/iod_index.html#">https://dclgapps.communities.gov.uk/imd/iod_index.html#</a>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>"March 2015 (page 21)</p> <p>2.3 Community safety</p> <p>2.9 The area experiences a range of public safety issues performing poorly in almost all the crime indicators recorded by the Metropolitan Police. There is a particularly high rate of 'violence against the person' and 'criminal damage incidents' in the Roehampton ward, compared with Wandsworth Borough as a whole. These higher than average crime levels have a negative impact upon the quality of life of residents on the estate. One of the key drivers behind the SPD is to address this issue and make the Roehampton area a safer place".</p> <p>"October 2015 (page 20)</p> <p>2.3 Community safety</p> <p>2.9 The area experiences a range of public safety issues performing poorly in almost all the crime indicators recorded by the Metropolitan Police. There is a particularly high rate of 'violence against the person' and 'criminal damage incidents' in the Roehampton ward, compared with Wandsworth Borough as a whole. These higher than average crime levels have a negative impact upon the quality of life of residents on the estate. One of the key drivers behind the SPD is to address this issue and make the Roehampton area a safer place.</p> <p>"[I'll have to come back to this as I would like to compare 'violence against the person' and 'criminal damage incidents' as I did this sometime back and there wards which featured poorly in this crime statistics].</p>		
Mr Angus Robertson	member Alton Action			552	9.3	<p>Part of this 'lack of vibrancy' of the retail area is the disused shops on Danebury Avenue and Roehampton High Street. What is being done to bring business to these areas? Where is the strategic placemaking function that the Council seeks to promote to ensure a planned retail offer that befits the needs of local people?</p> <p>As noted, this area of the estate 'suffers from the poor maintenance and condition of the buildings'. Therefore, surely, the redevelopment of the area through regeneration should, as an absolutely priority, seek to improve the poor condition and maintenance of these buildings, over and above any other objectives?</p>	<p>The adopted and draft Local Plan both direct town centre uses to the area's designated local centres, identifying these are the preferential location. This is consistent with national policy, and ensures that should applicable development interests in the area emerge, they will be directed first and foremost to the designates Local Centre, which includes part of Danebury Avenue. It is noted that the Government has changes the Use Classes, merging previously distinct uses (such as shops, restaurants, offices, and professional services) within a single use class (E, relating to commercial, business and service uses). The Local Plan embraces the flexibility that this provides to town centre uses, which will help to ensure vacant shops have a better chance of attracting tenants.</p> <p>The replacement of poor-quality building stock with well considered new buildings is identified within the vision and objectives for the area. It is agreed that this could be more strongly emphasised within Policy PM7.</p>	Expand PM7, Smart Growth to require that improvements are made to the poor quality building stock.
Steve Fannon				896	9.3	<p><b>"9.3 Roehampton is categorised as a 'local centre' within the Local Plan, with the area's shops and community facilities focused around the twin axes of Danebury Avenue and Roehampton Village. The relationship between the two, however, is disjointed and the area as a whole lacks a coherent centre. The former parade of shops is noted in the Urban Design Study as lacking vibrancy and interest, a result of an under supply of entertainment facilities or restaurants, and it also suffers from the poor maintenance and condition of the buildings."</b></p> <p>Regarding "lacking vibrancy and interest, a result of an under supply of entertainment facilities or restaurants". Part of this "lack of vibrancy" are disused shops on Danebury Avenue and Roehampton High Street. What is being done to bring business to these areas? Recent examples due to the regeneration are the closed shops on Danebury Avenue which have been closed for quite some time as per the following examples:</p> <p>Former Western Area Housing Panel (closed since circa August 2019) –</p> <p><a href="https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=336450297736376&amp;ref=pag_e_internal">https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=336450297736376&amp;ref=pag_e_internal</a></p>	<p>The adopted and draft Local Plan both direct town centre uses to the area's designated local centres, identifying these are the preferential location. This is consistent with national policy, and ensures that should applicable development interests in the area emerge, they will be directed first and foremost to the designates Local Centre, which includes part of Danebury Avenue. It is noted that the Government has changes the Use Classes, merging previously distinct uses (such as shops, restaurants, offices, and professional services) within a single use class (E, relating to commercial, business and service uses). The Local Plan embraces the flexibility that this provides to town centre uses, which will help to ensure vacant shops have a better chance of attracting tenants.</p> <p>The replacement of poor-quality building stock with well considered new buildings is identified within the vision and objectives for the area. It is agreed that this could be more strongly emphasised within Policy PM7.</p>	Expand PM7, Smart Growth to require that improvements are made to the poor quality building stock.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Danebury Avenue 3, 5-9, 11-29 odd (residential flats have been empty since late 2019 and the shops since circa September 2020)</p> <p><a href="https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=338195837561822&amp;ref=pag e_internal">https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=338195837561822&amp;ref=pag e_internal</a></p> <p>The play area in between the former Western Area Housing Office and Hersham Close 73-95 (out of action since at least August 2018) –</p> <p><a href="https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=438323764215695&amp;ref=pag e_internal">https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=438323764215695&amp;ref=pag e_internal</a></p> <p>Danebury Avenue 39-41 (both shops were empty for a little over two years) - <a href="https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=338435347537871&amp;ref=pag e_internal">https://www.facebook.com/pg/Roeregeneration-101220377926037/photos/?tab=album&amp;album_id=338435347537871&amp;ref=pag e_internal</a></p> <p>Regarding "poor maintenance and condition of the buildings" this is due to the Council's lack of care.</p>		
Steve Fannon				900	9.3	<p><b>"The eastern end of Danebury Avenue, in particular, would benefit from an improved 'public square' to serve as a connection to and a gateway for the retail parade".</b></p> <p>Most residents of the Alton Estate will suggest that having a "public square" by Roehampton Lane is madness. The following is taken from the Council's Roehampton Health Profile 2018 study and highlights the impact on Roehampton Church of England Primary School which near to where the "public square" would be located:</p> <p>Air pollution</p> <p>Neither of the primary schools on the Alton estate, nor the local secondary school fall within areas that breach air pollution (Nitrogen Dioxide –NO2) limits. However, Roehampton C of E Primary School, located next to Roehampton Lane, has areas within and near its school grounds that exceed the limits. Ongoing monitoring work is being undertaken with the school".</p> <p>Source</p> <p><a href="https://www.datawand.info/wp-content/uploads/2018/11/Roehampton-Health-Profile-2018.pdf">https://www.datawand.info/wp-content/uploads/2018/11/Roehampton-Health-Profile-2018.pdf</a></p>	Comment noted. The position of the new village square will re-establish the historic centre of Roehampton and reveal lost visual connections along Danebury Avenue, framing views of St Joseph's Church.	No change to the Local Plan required as a result of this representation.
Steve Fannon				901	9.3	<p><b>"In the interim, pop-up uses should therefore be encouraged in vacant shops, in particular where these support creatives, with the view to establishing a permanent cultural anchor space in the longer-term, potentially in partnership with the University of Roehampton or other institutional actors".</b></p> <p>This sentence is both frustrating and infuriating. Regarding "In the interim, pop-up uses should therefore be encouraged in vacant shops" please refer to the comments regarding section 9.3. There have been shops that have been closed for two plus years so what has prevented this from happening?</p> <p>A very similar idea was suggested at the Roehampton Partnership in late 2018 of which all three ward Councillors, a West Putney Councillors and the Councillor who is the Housing Cabinet member all attend this meeting. The following refers to text taken from the Minutes of these meetings:</p>	<p>Comments noted. The Local Plan sets out a vision and a framework for the future development of the area, stipulating what type of development (and of what scale) is permitted in different locations. The Local Plan itself does not direct provide investment in units. The inclusion of this sentence (and of a new policy on temporary uses) therefore seeks to provide clarity for developers (or other investors) on the acceptability in principle of short-term uses - including those which might otherwise not be acceptable in planning terms. See also the response to comment # 896.</p> <p>Comments provided on the possibility of using vacant shops to provide information on the regeneration project have been passed on to colleagues in the Development Management Strategic Applications team, who are responsible for the management of this project, as it does not fall within the purview of the Policy &amp; Design team.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Roehampton Partnership (27th November 2018)</p> <p>"A local resident added that it would be useful to use the empty shops in the area to display information about the regeneration project. The Assistant Director (Property Services) noted that this could be investigated and would likely be possible if the shops were Council-owned".</p> <p>Source:</p> <p><a href="https://democracy.wandsworth.gov.uk/documents/s64907/Minutes%20-%2027th%20November%202018.pdf">https://democracy.wandsworth.gov.uk/documents/s64907/Minutes%20-%2027th%20November%202018.pdf</a></p> <p>Roehampton Partnership (18th March 2019)</p> <p>"John Horrocks, Roehampton Forum, drew attention to page 13 of the agenda pack where it was noted that it may be helpful to use empty shops in the area. He stated that Andy Algar, Assistant Director (Property Services), had confirmed that the empty shops were Council owned. It was requested that, when the planning application was made public, the information was made available in the library or the empty shops. The Regeneration Projects Manager stated that it was intended to make the planning application available in the library. The Chairman stated that it would be helpful if the librarians could direct residents and if an officer could be available to talk through the planning application at a few designated time periods. The Regeneration Projects Manager explained that this would need to be discussed with planning officers as officers would have to avoid the risk of influencing people. He noted that the library would likely have displays on screens or boards and summary documents that were more digestible, as well as the full planning application pack.</p> <p>"Source:</p> <p><a href="https://democracy.wandsworth.gov.uk/documents/s66439/Minutes%20-%2018th%20March%202019.pdf">https://democracy.wandsworth.gov.uk/documents/s66439/Minutes%20-%2018th%20March%202019.pdf</a></p>		
Steve Fannon				902	9.4	<p>What is the estimated number of jobs to create in Roehampton by the regeneration? How many of these jobs will be taken by Roehampton residents? How many of these jobs will be long term residents and not short term residents due to studying at Roehampton University.</p>	<p>There is not currently a development partner for the Alton regeneration scheme, and as such an estimate is not known. Subject to receiving Stage 2 planning consent from the GLA, the procurement process will then commence to get a new partner. Part of the evaluation process will look at bidders' proposals for delivering socio-economic benefits, with specific reference to social value themes. Bidders are expected to demonstrate how they will ensure that social value is maximised through delivery of the scheme, which we would expect to include employment opportunities for local residents.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Miriam Howitt				127	9.5	<p>9.5 The assessment of road traffic at a time when Hammersmith Bridge is closed gives a false result. When the Bridge is open, by far the most traffic is through from the A3 to central London.</p> <p>Foot traffic would be greater if mothers with children at the local Primary Schools did not have free bus passes (often boarding a bus for 2 stops) and students of the Local Secondary Schools likewise: walking would be healthier. My own children cycled 4 miles to school in Wimbledon. Ibstock Place runs 4 small buses to bring their students from/to Barnes Station.</p>	<p>Comments noted. The assessment of road traffic is based on the past few years and the A3 is referencing as a one of the main routes through which traffic flows.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Steve Fannon				903	9.5	<p>This is confusing. Comparing travelling through Richmond Park and Wimbledon/Putney Commons is more for leisure than for a purpose such as health (Queen Mary's Hospital) and study (Roehampton University).</p>	<p>Comment noted. The nearby open space provides opportunities for some, but not all, journeys to be made in a traffic light environment.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Miriam Howitt				128	9.6	<p>9.6 In assessing the existing step-free ways North to South of Alton West the writer seems ignorant of the many ways available. Conversely Redrow's scheme fails by introducing one small flight of stairs which make it unusable for wheelchairs, and multiple steps beside Block A which have had to be gated to avoid miscreants.</p>	<p>Comment noted. It is considered there are opportunities for an improved pedestrian routes, creating an accessible, step-free and coherent network of paths.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Steve Fannon				904	9.6	<p>That's "Danebury Avenue" not "Danbury Avenue".</p>	<p>Comment noted. The lack of physical connectivity does not suggest no physical connectivity but that there are barriers which make it more difficult that the rest of the paragraph outlines.</p>	<p>Supporting text amended to read "Danebury Avenue".</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Disagree with the lack of physical connectivity, there are paths which could be improved or better highlighted to encourage use.		
Miriam Howitt				129	9.8	9.8 I don't recognise their "much of the areas have become overgrown, with sections of impermeable wilderness and spaces which are dark, unsafe and unusable". I walk South to North to Queen Mary's Hospital and 166 Roehampton Lane and East to West through the glades to the bus terminus and up Minstead Gardens to the Temple.	Agreed	Amend para 9.8 in response to this comment.
Mr Angus Robertson	member Alton Action			553	9.8	This is not an accurate statement. There are not sections of 'impermeable wilderness' in the area	Agreed	Amend para 9.8 in response to this comment.
Steve Fannon				905	9.8	Again, disagree and areas which are dark can be improved rather than dismissed. I've just had a lamp post fixed after a year which was in green area that had become dark due to the lack of effort from the Council to repair the lamp post.	Comment noted.	Amend para 9.8 in response to this comment.
Mr Angus Robertson	member Alton Action			554	9.9	We do not recognise the estate as a 'confused' place or the perception of a lack of safety.  The primary reason that the area should be identified as an area for regeneration is not the incremental change that has occurred over years but the fact that parts of the buildings have been left to fall into significant disrepair over the last 15 years and plans for regeneration have failed to be implemented to address this.	Comment noted. From a contemporary urban design perspective, the estate is not as cohesive as it could be, which gives the perception of a lack of safety.  The statement relating to higher than average crime levels has been backed up by Indices of Deprivation 2019 data. It can be accessed by following this link: <a href="https://dclgapps.communities.gov.uk/imd/iod_index.html#">https://dclgapps.communities.gov.uk/imd/iod_index.html#</a>	No change to the Local Plan required as a result of this representation.
Steve Fannon				906	9.9	Confusion can be improved by signage. We have struggled for years with the Council regarding improving the signage to where we live, and we have had signage installed to improve the sign posting the Manresa Clubroom. We have also tried to have signage for the DARA Focus Hall though the Council's Housing team will not due to it being the remit of Highways.  Regarding "the area has also suffered from additions and demolitions over the years, obstructing views, and infilling 'spare' bits of land with poor quality developments" this is due to the Council permitting this to happen.	Comment noted. Comment noted. Policy PM7 could be expanded to require development proposals to remove any visually unappealing and/or confusing signage to improve legibility.	Expand PM7, Placemaking to require development proposals to remove any visually unappealing and/or confusing signage to improve legibility.
Steve Fannon				907	9.11	Absolutely and this constantly compounded by the Council permitting new developments and Roehampton University's students parking their cars on the Alton Estate.	Comment noted	No change to the Local Plan required as a result of this representation.
Miriam Howitt				130	9.12	9.12 The greater part of the building stock proposed for demolition is identical in design and construction to 40 identical buildings on the Alton Estate as a whole, most of which have been renovated whereas these have been neglected.  The connection between Alton East and Alton West is best achieved by widening Holybourne Avenue as it approaches Danebury Avenue. It is a bottleneck exacerbated in Redrow's plan.	Comment noted. The current wording is considered appropriate.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			555	9.12	It is not <u>replacement</u> of building stock that is needed per se. Replacement through demolition and rebuild is not aligned to the policies of sustainability detailed elsewhere in the Local Plan.  The Council has failed to explore the possibility of retrofitting existing buildings in the context of the potential regeneration of the Alton Estate. This approach would support policy LP10.  The greater part of the building stock proposed for demolition is identical in design and construction to many similar buildings on the Alton Estate, most of which have been renovated whereas these have been neglected.  The potential of improving buildings there through retrofitting should be examined in line with 'Better Homes for Local People, the Mayor's good practice guide for estate regeneration' (Mayor of London, 2018) which states	In order to maximise the density of the site it has been necessary to demolish and rebuild. The masterplan has allowed the site to provide a mix of affordable homes and private dwellings alongside consolidated state of the art community facilities that deliver services directly to the local community. Enhancements to health and wellbeing through improved healthcare provision, well designed spaces to relax and socialise and areas for play and activity to promote fitness and flexible office floorspace.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						that developments should 'always consider alternatives to demolition and balance the benefits with wider social and environmental impacts.  Renovation has been shown in many other settings to be preferable to demolition in terms of environmental, financial and social outcomes.		
Steve Fannon				910	9.12	<b>“creating local economic opportunities through the provision of incubator space and revitalised commercial premises to address relative deprivation within the area; and”</b>  Not convinced this is what is required for the Alton Estate let alone Roehampton.	Comment noted. This seeks to address a lack of economic opportunities within the Alton Estate (and area more generally), including the proportion of residents in high value sectors, and builds upon the Alton Area Masterplan. The relatively low public transport accessibility of the area is a significant contribution to economic activity (although it is recognised that the causes are multifarious), but for the same reason larger-scale economic development is unlikely to be suitable or attractive for development. Smaller scale incubator space is more appropriate for the area, and can built on existing educational resources and institutions, such as Roehampton University.	No change to the Local Plan required as a result of this representation.
Steve Fannon				908	9.12	Again, “promoting the replacement of poor-quality building stock” is a concern for all building stock on the estate.	Comment noted. This point should be clarified within Policy PM7.	PM7 amended, Placemaking Policy part B to require that improvements are made to the poor quality building stock.
Laura Hutson	Sport England			132	9.13	Development that would either involve the loss of playing field or prejudice the use of the playing field (for example, housing immediately adjacent to an existing playing field) would be strongly resisted by Sport England.  I note that there is no inclusion of the Bank of England sports centre and playing field site (Roehampton) in the Local Plan site allocations. I would like to note that this is a strategically important site and it is Sport England's strong desire that this site is protected for sport, particularly as we are aware that discussions over a change of ownership are ongoing, albeit these have been somewhat delayed by the onset of the Covid-19 pandemic. This is particularly important in light of the fact that uncertainty over the future of the site has led to some users being unable to access the site and seeking access to facilities elsewhere.	LP56 Open Space, Sport and Recreation explains that the loss of playing fields will not be permitted unless certain criteria are met.  The Bank of England site has been considered as part of the site allocation sifting process and was not included due to location and lack of interest from the owner or a developer.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			380	9.13	The departure of Redrow has shown 'the masterplan' is unbuildable, as well as completely contrary to all the Council's ambitions towards zero carbon. It's time for a rethink, with a proposal that complies with all aspects of the Local Plan.  How does this site allocation relate to the 2015 Roehampton SPD which it contradicts?	The Development Considerations explain that proposals should make reference to the Alton Area Masterplan.  Redrow Homes are no longer the development partner and the Council is seeking a new partner who will likely amend or replace the existing planning permission.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			558	9.13	Wandsworth's Corporate Plan includes the objective of 'More homes and greater housing choice - By delivering a range of homes to suit different needs for people who live or work in the borough, <u>particularly for those on lower incomes</u> '.  If the needs of those on lower incomes are to be met, in particular, then the Alton West Regeneration Area should <u>prioritise</u> new affordable housing, not having it as one of many aims for the regeneration. And this should be genuinely affordable social rent housing, not other variants which are not truly affordable for people on lower incomes.	The Anchor for Change section states that the vision for the redevelopment is to provide new affordable homes. Policy LP23 seeks to maximise the provision of affordable housing.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			723	9.13	TfL welcomes proposals for any redevelopment to contribute towards improved walking and cycling facilities, enhanced bus services and bus supporting facilities including stops, stands and drivers' facilities. Any relocation of the bus turnaround must ensure that it provides for improved operational efficiency and maximises flexibility. Advice should be sought from TfL on this issue.	Comments noted.	No change to the Local Plan required as a result of this representation.
Steve Fannon				912	9.20	Zip cars are everywhere on the Alton Estate, at least on the Alton Estate and close by on Norstead Place.	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			557	9.21	Yes, improved bus services are needed but the link to Barnes station should not be prioritised. For many people living in Roehampton the link to Putney station is more important given that it has a better range of services, is a cheaper link to central London (zone 2 rather than 3) and is significantly better than Barnes in terms of public safety.	Comments noted.	The text has been updated to reference both Putney and Barnes stations.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Steve Fannon				913	9.21	Any consideration needs to take into account the amenity of the residents which may be impacted, such as moving the current Danebury Avenue bus stop by Minstead Gardens closer to residents in the tower blocks of Tunworth Crescent.  Putney Station needs to be strongly considered as this is a Zone 2 station versus Barnes station which is Zone 3. The transport cost may sway which station is utilised for travel.	Comments noted.	The text can be updated to reference both Putney and Barnes stations.
	Wandsworth Cycling (London Cycling Campaign)			222	9.22	This is a requirement. The required improvements must provide a safe, traffic free cycle route	Comment noted. LP53 Parking, Servicing, and Car Free Development sets out the requirements for cycle parking in the borough which apply to all site allocations.	No change to the Local Plan required as a result of this representation.
Steve Fannon				914	9.28	Any consideration needs to take into account the amenity of the residents which may be impacted, such as moving the current Danebury Avenue bus stop by Minstead Gardens closer to residents in the tower blocks of Tunworth Crescent.	Comments noted. In line with policy LP2, development proposals must not adversely impact the amenity of existing and future occupiers or that of neighbouring properties. This requirement is not repeated here.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			559	9.32	The needs of people living in the Alton West Intervention Area are not served from imposing new tall buildings in an area which is already densely populated. Such an approach, which would bring 2-3,000 additional residents to the area (through the current Alton Estate Regeneration proposals) will not be successful as the services (transport, retail etc) are already unable to meet the needs of the existing population	The Local Plan seeks to create a positive framework for managing growth over the plan period, in line with the NPPF. The Council will use the Community Infrastructure Levy to fund strategic infrastructure necessary to deliver the vision set out in the Local Plan, including the ambitions outlined within the Area Strategies, where appropriate, and with the priorities identified in the Council's Infrastructure Delivery Plan. Further, Planning obligations will be sought on a site-by-site basis to ensure that development proposals provide or fund local improvements to mitigate the specific impact of development.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			381	9.33	Tall Buildings in this context is over 3 storeys not 6.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. The London Plan states that tall buildings should not be less than 6 storeys, or 18 metres measured from ground to the floor level of the uppermost storey.	No change to the Local Plan required as a result of this representation.
Steve Fannon				915	9.36	This is a must and needs to be strengthened. The Temple has been on the Heritage at Risk register since 1999 and it should be mentioned in the Local Plan. Referring to 9.1 of this draft it states "9.1 The Area Strategy for Roehampton identifies opportunities to create an improved sense of place for the area, while celebrating the existing landmarks in the Alton Estate" and this is an existing landmark that has gained recent focus as an Alton Estate resident has highlighted this "landmark".  Additionally, access needs to be considered. During the lockdown it is impossible to visit the Temple as it must be accessed via the DARA Focus Club car park which is locked. Residents are not able to enjoy the "landmark".	Comment noted. The wording is deemed appropriate as it requires a plan for the long term maintenance and management of the temple.	No change to the Local Plan required as a result of this representation.
Steve Fannon				916	9.41	"Consider" or "make happen"?	The current wording means consider.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			382	9.43	Tall Buildings in this context is over 3 storeys not 6. Nothing equalling or above the height of the listed Roehampton House. This is a hilltop and close to several listed buildings.  It's more than a little worrying that every site allocation in SW15 states the same height as sensitive.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone.	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	626	9.43	Background  The Trust  With over 9,000 dedicated staff caring for patients around the clock, the Trust is the largest healthcare provider in south-west London, serving a population of 1.3 million across south-west London. In addition, a large number of services, such as cardiothoracic medicine and surgery, neurosciences and renal transplantation, cover significant populations from Surrey and Sussex, serving around 3.5 million people.	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>As well as acute hospital services, the Trust provides a wide variety of specialist care and a full range of community services to patients of all ages following integration with Community Services Wandsworth in 2010. Services are delivered from a range of locations including Queen Mary's Hospital in Roehampton.</p> <p>The Existing Built Estate</p> <p>Queen Mary's Hospital is a purpose-built community hospital, procured under a Private Finance Initiative and opened in November 2006. The majority of services are provided by St George's University Hospitals NHS Foundation Trust with other services provided by Kingston Hospital NHS Foundation Trust.</p> <p>South West London &amp; St George's Mental Health NHS Trust occupies three wards but is planning to move its services to one of its other sites, leaving those wards vacant.</p> <p>Other parts of the building are currently vacant or under-used following previous service re-organisations.</p> <p>Opportunities</p> <p>Because there is space available, Queen Mary's Hospital presents some excellent opportunities to provide services from a modern and well-maintained environment away from the Trust's main acute hospital in Tooting, for example it could provide a more local base for outpatients or elective procedures.</p> <p>It also provides important capacity to help deal with extraordinary circumstances, for example the recent pandemic has highlighted the desirability of having separate facilities to deal with non-pandemic-related cases.</p> <p>At present there are no decisions have been made in relation to any additional services that might be provided from QMH in the future. Further opportunities, for example integration with primary care, could arise once the area's Integrated Care System assumes a statutory footing from April 2022.</p> <p>Comments on Draft Policy</p> <p>Our comments on the draft Written Statement are scheduled on the following pages.</p>		
Josephine Vos	Transport for London			724	9.43	Any development should be car free and the re-provision of hospital car parking should be limited to operational needs and Blue Badge car parking.	LP53 Parking, Servicing, and Car Free Development sets out the requirements for car free development in the borough.	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	627	9.46	Agreed, particularly in terms of pedestrian access.	Comment noted	No change to the Local Plan required as a result of this representation.
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	628	9.47	<p>The form of development that might be brought forward may not be capable of achieving this and therefore this requirement could be a bar to development being brought forward. Rather, development should be based on sound place-making principles and pay due regard to the setting of Roehampton House.</p> <p>It may not be necessary to re-provide car parking if usage does not justify it.</p> <p><b>Suggested Amendments</b></p>	<p>Comments noted. The current wording is considered appropriate with respect to the listed boundary wall.</p> <p>Due to the low PTAL of the site it is expected that car parking will need to be reprovided.</p>	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<b>Built Form</b> — <del>The establishment of building frontages shall be established to Roehampton Lane behind the listed boundary wall should be explored. Any</del> The re-provision of the car parking needs to be sensitively integrated within the site.		
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Paul Burley	Montagu Evans	629	9.49	<p>This comment is not appropriate to the allocated area, all of which is car parking.</p> <p><b>Suggested Amendments</b></p> <p><b>Site Layout</b>—<del>Proposals must maintain and enhance the parkland character of the landscape, ensuring that any new development in the area does not diminish the openness and harmonious</del> <u>should achieve an appropriate</u> balance of buildings and open spaces.</p> <p><b>Not Included - Land Use</b></p> <p>The proposed allocation does not set out the land uses that Council might consider to be appropriate in the allocated area. Any non-healthcare uses should only be permitted where it can be demonstrated in the context of an agreed Estate Strategy that the land is not needed for healthcare-related uses.</p> <p><b>Suggested Amendments</b></p> <p>The Trust would welcome the opportunity to provide comments on this matter following clarification from the Council.</p> <p><b>Not Included –Car Parking</b></p> <p>The Trust's emerging Estate Strategy will include the aim of a more sustainable future for its estate and opportunities will be explored to reduce non-essential car journeys.</p> <p>However, given the low PTAL of this location, the wide catchment area and the potential need for staff to work between a number of sites (e.g. between Tooting and Roehampton), sufficient vehicle parking must be maintained.</p> <p>Additional Text: <u>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.</u></p>	Comment noted. The site allocation establishes the uses which are appropriate for the site.	The site allocation site layout, uses, and parking requirements have been amended.
	NHS Property Services Ltd			1484	Map 9.4	<p>Please see attached</p> <p>Roehampton RO3</p> <p>Queen Mary's Hospital car park, SW15Queen Mary's Hospital is allocated for reprovision of the existing car parking with additional medical facilities and mixed uses. The Hospital is a large modern facility completed in 2006 and is a fully operational healthcare facility offering a large number of health services to the wider area. While it is owned by NHSPS, it is a Public Finance Initiative (PFI) development with a 30-year contract term.</p> <p>Subject to commissioning and contractual requirements, NHSPS support the proposed site allocation. NHSPS would stress that the site allocation should allow for the delivery of one or all the proposed uses, subject to development requirements. For example, mixed uses could come forward independently of medical facilities and the need for car parking should be assessed against the most up to date planning policy and operational requirements of the hospital.</p>	<p>Comment noted.</p> <p>Due to the low PTAL of the site it is expected that car parking will need to be reprovided.</p>	No change to the Local Plan required as a result of this representation.
Miriam Howitt				124	Picture 9.2	<p>Please note that the photograph is of Grade II Listed Maryfield (Maryfield Convent, headquarters of the order of PSMG nuns) is titled erroneously as "Kairos Centre". An extension housing their Novitiate was added in the 1960s and this was later converted to make the Kairos Centre, a Retreat and</p>	Comment noted.	Amend: Picture 9.1: <del>Kairos Centre</del> <u>Maryfield Convent</u>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Conference Centre, used freely for meetings by the local community, with its own entrance, car park and driveway, within the grounds.		
Mr Robert Arguile	Chair The Putney Society			379	Policy PM7	<p><b>Placemaking</b></p> <p>The chart just confirms that Roehampton faces challenges regarding traffic management and public transport accessibility that weaken its performance in Placemaking. Everything else here is a waste of time until transport is radically improved.</p> <p>Para C Roehampton Lane felt like a lane until recently. Why ask for a strong edge?</p> <p><b>Smart Growth</b></p> <p>Para B &amp; C Facilities are essential to replace those closed in recent years by Wandsworth Council.</p> <p><b>People First</b></p> <p>Para A An actual link to the Park would be more useful than a 'conceptual' one. Visually this won't work. Mount Clare is on a ridge which conceals Richmond Park from the lower end of Danebury Avenue.</p> <p>Para C How does a link to Richmond Park promote cycling when most journeys are in the opposite direction? As noted above significantly more cycling is unlikely due to distances and hills.</p> <p>Para D Roehampton High Street won't feel united to Danebury Avenue as long as the A306 exists.</p> <p>Para E More bus stops are useless without more bus capacity. Changing buses at Medfield Street works southbound but not the other way. The first stop on Roehampton Lane is too far up the hill.</p>	<p>Placemaking - Roehampton does face significant transport challenges which are addressed in PM 7 (People First). A strong edge is appropriate for Roehampton Lane because it is an A road that currently does not have any active frontages.</p> <p>Smart growth - Comment noted.</p> <p>People first - The conceptual link will provide for those who live on the estate to make journeys to and from Roehampton Lane and Richmond Park easier. Richmond Park is a large, traffic-light environment that is pleasant to cycle through and so should be utilised, however part C also mentions the council's support for other local cycle lanes. Increasing the number of bus stops will make the bus more accessible and convenient for local people.</p>	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			556	Policy PM7	<p>Comment on Placemaking, D:</p> <p>The objectives for 'Placemaking' are not served from imposing new tall buildings in an area which is already densely populated. Such an approach, which would bring 2-3,000 additional residents to the area (through the current Alton Estate Regeneration proposals) will not be successful as the services (transport, retail etc) are already unable to meet the needs of the existing population.</p> <p>Comment on Smart Growth, A:</p> <p>The intensification of housing that this growth target implies is too severe for an area that is already densely populated.</p> <p>Such an approach, which would bring 2-3,000 additional residents to the area (through the current Alton Estate Regeneration proposals) will not be successful as the services (transport, retail etc) are already unable to meet the needs of the existing population.</p> <p>Comment on People First, A:</p> <p>Why should the 'landscape provide a conceptual link through the area'? If the approach is about 'People First' then it is the needs of people who live, work and study on the estate that should be given primacy, not those who are transiting through the area.</p> <p>Comment on People First, C:</p> <p>New connections for pedestrians and cyclists between the estate and Richmond Park may be welcomed.</p>	<p>The Local Plan seeks to create a positive framework for managing growth over the plan period, in line with the NPPF. The Council will use the Community Infrastructure Levy to fund strategic infrastructure necessary to deliver the vision set out in the Local Plan, including the ambitions outlined within the Area Strategies, where appropriate, and with the priorities identified in the Council's Infrastructure Delivery Plan. Further, Planning obligations will be sought on a site-by-site basis to ensure that development proposals provide or fund local improvements to mitigate the specific impact of development.</p> <p>The conceptual link will provide for those who live on the estate to make journeys to and from Roehampton Lane and Richmond Park easier.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						But the facilitation of cycling around the estate and from the area to other popular destinations should also be a priority.		
Josephine Vos	Transport for London			722	Policy PM7	TfL welcomes the proposals to encourage a modal shift to walking and cycling, including the creation of new pedestrian and cycle connections.  TfL also welcomes proposals to improve bus stops by relocating them in the main carriageway	Comment noted.	No change to the Local Plan required as a result of this representation.
Cllr Loveland	Labour Group			641	Policy PM7	Whilst we support of the strategy, more should be made of the need to create greater synergy between the Alton Estate and Roehampton Village. This is recognised in the text (para 9.3) and in clause B under the Smart Growth section of policy PM7, but we ask that the Placemaking section of PM7 includes an additional clause that, in relation to Roehampton Village, encourages improvements to the public realm including cycling provision and parking to attract and sustain the local shops and businesses. We welcome the commitment to a new connection between Tunworth Crescent and Richmond Park and ask that this be illustrated in the supporting diagram	Comment noted.	The Spatial Area Map for Roehampton has been amended to show a suggested new route from Tunworth Crescent to Richmond Park.
Steve Fannon				911	Policy PM7	<b>Smart Growth</b>  <b>D. The temporary use of vacant shopping units will be supported, especially where this provides cultural facilities or space that promotes the area's Cultural Strategy.</b>  See previous comments regarding use of vacant shops.  <b>People First</b>  <b>C. The Council's Local Implementation Plan indicates that a large number of trips could be switched to walking and cycling. 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.</b>  Not convinced the residents of the Tunworth Crescent area would like to have this path to Richmond Park. This will potentially more cyclists into Danebury Avenue and into residential areas. Roehampton Gate and Robin Hood Gate (or even Chohole Gate) are accessible.	Any future proposals will require public consultation with the residents of Tunworth Crescent.  Responses to comments on the use of vacant shops are provided against those representations.	No change to the Local Plan required as a result of this representation.
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1522	Policy PM7	PM7 Roehampton Regeneration Area  New residential accommodation in Roehampton will help meet the borough's housing target, as set out in Local Plan Policy LP 24. Development in this area is expected to provide at least 1,145 homes by 2037/38. Site allocation RO1 Alton West Intervention Areas, Roehampton, SW15 refers to a range of social infrastructure, including 'GP facilities, leisure and health uses'. There are plans to transform primary care services in the area, which could include primary care provision on the Alton West site and on the Queen Mary Hospital site. We note that site allocation RO3 Queen Mary's Hospital car park proposes additional medical facilities and mixed uses in addition to replacement car parking. We note the representation made by St George's University Hospitals NHS Foundation Trust Site. We support the comment that any non-healthcare uses should only be permitted in accordance with an agreed Estate Strategy which demonstrates that the land is not needed for healthcare-related uses.	Comment noted.	Development Considerations have been updated to require any non-healthcare uses to in agreement with the Estate Strategy
Miriam Howitt				131	Statement Anchor for Change - The Alton Estate Regeneration 1	Anchor for Change – The Alton Estate Regeneration A better scheme than Redrow's could achieve these aims. Chunky, closely-spaced tall buildings 6-9 storeys high, straight off the pavements are not the preferred solution, neither is a huge Civic Building crammed with inappropriate functions, each on 2 floors requiring lifts, none with their own out-door space – Adult and Children's Libraries, Youth Club and BASE, Doctors' Surgery (none with parking or layby space for the users or visitors) - and Community Meeting Room; with 5 storeys of flats above with no parking. Green roofs with solar panels and roof gardens are no replacement for ground level lawns, shrubs and trees, the Village Green and 81 small private gardens.	Comment noted. The application of policies is a Development Management issue rather than a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Angus Robertson	member Alton Action			561	Statement Anchor for Change - The Alton Estate Regeneration 1	<p>New affordable homes should be the priority here, and these could be provided through a renovation and infill approach rather than mass demolition.</p> <p>For the area of Roehampton, with a significantly higher than average population of people on lower-than-average incomes, genuinely affordable homes should be the priority in this vision.</p>	In order to maximise the density of the site it has been necessary to demolish and rebuild. The masterplan has allowed the site to provide a mix of affordable homes and private dwellings alongside consolidated state of the art community facilities that deliver services directly to the local community.	No change to the Local Plan required as a result of this representation.

## Chapter 10 - Area Strategy for Balham

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Julie Sullock				986	General Balham Comment	<p>Dear Planning department, I would like to make a few comments about your draft local plan for the next 15 years. I have lived in Balham for 25 years and I was born in Wandsworth so have a lot of attachment to the area...</p> <p>It would be good to have more street trees although I think other street furniture could be removed. The high street is very busy, and it is sometimes hard to keep a social distance away from others without going into the road.</p> <p>I think the traffic camera in Balham high street, outside the Nat West &amp; betting shop could be removed.. as I have never seen it go off &amp; no one speeds through there as there are too many obstacles. I think the cycle highway should be encouraged to be in Cavendish road, not Balham high street. There are too many lorries, loading shops like Aldi, &amp; commercial traffic in the high street. I don't think the roads should be made any smaller to accommodate cyclists but they should make the pavement smaller near Clapham South Station &amp; down the hill towards the Devonshire pub &amp; put a cycle path on the pavement, as the pavement is wide there... Balham High street is on the Ambulance run from St Georges hospital, so they need to get through &amp; I have seen the bicycle pollards hold them up, when an AA truck &amp; broken-down car &amp; bus are blocking their way...</p> <p>Offices and shops that shut due to the covid crisis, could be leased out at low rent and be used by artists as pop up galleries/ studios / rehearsal space for actors etc....</p> <p>Hildreth Street market is a great space to socialise &amp; is a colourful &amp; vibrant part of Balham..</p> <p>The Balham library maybe could be a better place where artists would hold exhibitions, &amp; maybe a space outside the library cold be made to drink tea &amp; coffee with a small green area as well.</p> <p>Traffic in the future will be greener with more electric cars... If the parking restrictions were changed in Tooting, so people can park after 1.30 on Saturday &amp; shop &amp; support local shops, then there will not be a traffic jam through Balham every Sunday, because everyone shops on Sunday instead.. I know you want to discourage cars, but if you have a disability, or bad back then you have to shop in a car esp. since the pandemic when bigger shops are happening less often, a habit which will go on for some time in my view...</p> <p>Uninhabited flats should be used and landlords encouraged to let them to people or sell them &amp; if they don't then the council tax for that property should go up after 2 years of lying empty, that would focus minds, instead of buying ugly, small box like houses...</p>	<p>Policy PM8 supports measures to widen pavements along Balham High Road. This represents an opportunity to provide more space for pedestrians.</p> <p>The use of traffic cameras is intended to ensure no one speeds and any concerns about them should be directed to TfL.</p> <p>Balham High Street is the preferred location for Cycle Superhighway 7 as it is a main route from Clapham south towards Tooting and provides a variety of services and destinations for active travel journeys.</p> <p>LP54 Parking, Servicing and Car Free Development sets out the Council's desire to have more off road servicing in order to avoid delivery vehicles being parked on the side of the road.</p> <p>Wandsworth Local Implementation Plan and the Corporate Strategy outline some of the projects the borough is currently preparing to create a better active travel environment, including the creation of cycle lanes. RW – offices/retail</p> <p>Policy PM8 identifies Balham Library as one of the desirable locations for the expansion of existing cultural offer.</p> <p>Amendments to specific parking restrictions is not a Local Plan matter. It is the aim of the Council that reducing the need to make unnecessary non-active travel journeys is the most sustainable outcome and this is encouraged.</p> <p>The issue relating to uninhabited flats is not within the remit of the Local Plan.</p>	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1296	General Balham Comment	<p>10 Area Strategy for Balham We would like clarity on the following: - With the loss of car parking spaces given the development of the car park at Balham Sainsbury's, what travel plans are in place to ensure that access to the area?</p>	Travel Plans are produced by an applicant when they submit an application for development.	No change to the Local Plan required as a result of this representation.
Deborah Phelan				149	10.4	<p>You probably need to take a rain check on Crossrail 2, in view of the problems with the Elizabeth Line. My personal view is that Tooting would be a better route should this go ahead, as it would create greater connectivity for the locations lower down the Northern Line without the major disruption to transport that would result from the closure of the Balham stations that would undoubtedly result from constructing it in Balham. And we already have a rapid connection to Clapham Junction and Victoria which we would lose for the duration of any works!</p>	Comments noted.	No change to the Local Plan required as a result of this representation.
Mr				271	10.4	<p>I think it's become clear in the past 12 months that cross-rail 2 is going to be delayed by a decade or more and may now never be built. Therefore, I think it</p>	The Local Plan has been updated to reflect recent updates from TfL regarding Crossrail 2. It is still considered that it could come forward during the lifetime of	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Ben Roberts						<p>should be disregarded for planning purposes and accordingly removed as a factor in decision-making.</p> <p>Additionally, consideration should be given to the reduced level of commuting and office-based working, which will change people's travel and shopping habits.</p> <p>What evidence is there of increased demand for office space in Balham, particularly post-COVID. I think the assessment of demand needs to be reconsidered and adjusted accordingly. There may be demand for residential accommodation, but this also needs to be tested post-COVID due to reduced demand for inner-city dwelling.</p>	<p>the Local Plan and should therefore remain in the plan.</p> <p>It is recognised that the Coronavirus pandemic is likely to impact commuting habits and the extent of office-based working, however it is unclear what the longer-term impact on demand will be as a result. Industry experts have, for example, suggested that it could result in the decentralisation of office floorspace to town and local centres, such as Balham; that we might see a return to predominantly office-based working; or that home-based working will persist, but will be unlikely to translate into demand for localised office floorspace (co-working space, etc). There is limited evidence and data currently available to substantiate what the longer term impact will be (indeed, at the time of writing we are still in conditions of enforced homeworking). The Council will therefore continue to monitor this as it becomes available (as it will for demographic trends), and will revise the policies accordingly, if necessary. It is noted that the policy approach set out within the Local Plan already provides good flexibility for office provision in centres such as Balham. In line with national planning policy (and the London Plan), office development is preferentially directed to the borough's centres, however if demand does not materialise other uses will also be acceptable as part of larger mixed-use development.</p>	
Deborah Phelan				150	10.5	<p>In the thirty or more years that I have lived in the area I have never viewed the car parks as having a negative effect on the street scene - rather, they enable those who would otherwise have difficulty accessing the area to do so. I use the car - for which I pay Wandsworth a significant amount each year in resident parking fees - in order to travel OUT of London to areas I cannot readily access by public transport (when this is available). Moreover, the A24 is a trunk route from London to Dorking which has existed as a major route since the Roman occupation, so I would question how much of the private traffic on it is local. It is also very important to remember that mobility issues are not limited to older people - which is why children as young as 2 may be eligible to hold a Blue Badge.</p>	<p>Comment noted.</p> <p>LP51 Sustainable Transport supports reducing the need to make unnecessary non-active travel journeys and reducing car parking helps encourage the use of more sustainable modes of transport.</p> <p>BA 1 includes the re-provision of parking on the site.</p>	No change to the Local Plan required as a result of this representation.
Caroline Hartnell				158	10.5	<p>I would encourage any measures to encourage people to use their cars less. Making cycling and walking pleasanter and above all safer is a priority.</p>	<p>Comment noted. LP51 Sustainable Transport supports reducing the need to make unnecessary non-active travel journeys and reducing car parking helps encourage the use of more sustainable modes of transport.</p>	No change to the Local Plan required as a result of this representation.
Mr Ben Roberts				272	10.5	<p>10.5</p> <p>The car parks in Sainsbury's and Waitrose support people both doing their weekly shopping, but also visiting other small local retailers. Removing or reducing parking space will negatively impact those retailers and consequently put the retail demand for space and character of Balham at risk.</p> <p>Bus and traffic speeds on the high road have been most negatively impacted by the TFL initiatives which have narrowed roads and removed bus stops and bus lanes.</p> <p>The widening of pavements has negatively impacted the area by causing traffic congestion with no tangible positive impact for pedestrians.</p> <p>Pedestrian-ising the B242 had the effect of causing extreme congestion, for little tangible benefit to the community or local businesses.</p> <p>Planning should be taking into consideration and cater for the impact of the ULEZ extension in October 2021. This will certainly increase pressure on roads outside the south circular, but is not mentioned in the planning at all.</p>	<p>Comment noted. LP51 Sustainable Transport supports reducing the need to make unnecessary non-active travel journeys and reducing car parking helps encourage the use of more sustainable modes of transport.</p> <p>BA 1 includes the re-provision of car parking on site.</p> <p>The developments by TFL are focuses on reducing car dominance, which would then increase the fluidity of all other modes of transport. This is in accordance with LP 51: Sustainable transport.</p> <p>Pedestrianizing Bedford Hill (B242) is another part of this scheme that attempts to reduce the dominance of cars. The local cafes and restaurants have benefited from this by being able to utilise the road for additional summer seating, while local people are able to enjoy a qualitatively better streetscape.</p> <p>The Local Implementation Plan 2019 contains details of how the expansion of the ULEZ will be managed.</p>	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			223	10.11	<p>"in particular to capitalise on the location's good cycling links"</p> <p>Note: cycling links are not currently good! (The only exception is the 2020 TfL CS7 temporary improvements) There is potential for good (high quality) cycling links, not least connecting to nearby Tooting Commons &amp; Wandsworth Common</p>	<p>Comment noted.</p>	Vision has been amended to more accurately describe the existing cycle links

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Josephine Vos	Transport for London			727	10.12	Any redevelopment of the site should be car free. The opportunity should be taken to reduce the amount of public parking on site to maximise the developable area and to take into account the site's town centre location, high PTAL and opportunities for active travel.	The location next to a large supermarket means that the car parking is highly valuable for shoppers. See LP 53 for more detail on the possibility for car free development at this site.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			225	10.20	Must accommodate both walking & cycling	Comment noted.	No change to the Local Plan required as a result of this representation.
Dr Samuel Clifford				581	10.20	I agree fully with this sentiment.	Comment noted.	No change to the Local Plan required as a result of this representation.
Laura Cole				40	Map 10.2	<p>To me it feels as if the natural centre of Balham should be where the Sainsbury's car park currently is and so I am really excited that you highlighted the same idea in your strategy.</p> <p>What I have been saying to anyone who will listen for years is that Sainsbury's should either have their car park underground (although I worry about the impact of this on the roots of the nearby trees), or cut the size of the car park by half or even two thirds with priority given to disabled drivers or those with children. It would then be more similar in size to the Waitrose car park.</p> <p>The portion that is left already has some lovely mature trees which should be incorporated into a new small park/green, perhaps with a bandstand or something that could host live music.</p>	Comment noted. LP58 Tree Management and Landscaping protects existing trees and landscape features such as those at the Sainsbury Car Park site allocation. The policy provides more details on the importance of trees to the borough and criteria the Council will use to assess a developments impact on trees. No changes to the Local Plan are considered necessary.	No change to the Local Plan required as a result of this representation.
Mrs Sasha Brendon				432	Map 10.2	This would be a wonderful addition to Balham town centre and take away the current central eyesore that is Sainsbury's car park!	Comment noted.	No change to the Local Plan required as a result of this representation.
Deborah Phelan				151	Picture 10.1	This image fails to show the traffic congestion that was created at the junction of Bedford Hill, Fernlea Road and Station Road. Wandsworth Council should resist any calls for renewed pedestrianisation of Bedford Hill, since the access restrictions imposed by TfL under its StreetSpace programme would force traffic requiring access to Streatham / Bedford Hill / Sainsbury's car park to use inappropriate residential side streets.	Comments noted.	No change to the Local Plan required as a result of this representation.
Caroline Hartnell				157	Picture 10.1	The pedestrianisation of Bedford Hill transformed the area and brought it to life in a way that it had never been before. I would love to see this as a permanent change.	Support noted.	No change to the Local Plan required as a result of this representation.
Caroline Hartnell				159	Picture 10.2	I would love to see more street trees planted. In Sistova Road, there are a few, but we could do with many more.	Support noted. LP58 Tree Management and Landscaping supports the introduction of more trees throughout the borough.	No change to the Local Plan required as a result of this representation.
Mr Nick Symons				49	Policy PM8	<p>My single issue in Balham is to remove wholesale the TfL traffic scheme on Balham High Road.</p> <p>It is not working, and was implemented, imposed even, without public consultation, risk assessment or impact assessment.</p> <p>It has removed disabled bays and business delivery bays, and transplanted bus stops away from the bus shelters and onto 'pontoons'. These are in the middle of the traffic, and to reach them, passengers including the disabled and elderly and those with pushchairs have to cross the cycle lane.</p> <p>A further disappointing consequence is the damage to the environment. The scheme is ugly.</p> <p>Please can this section of the A24 at least be made into a boulevard as once planned, or if not, returned to how it was before TfL interfered?</p>	PM8 sets out the Council's considerations for Balham High Road and the implementation and removal of the TfL Traffic Scheme is not within the remit of the Local Plan.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Laura Cole				39	Policy PM8	As a long term Balham resident with young children, I read your Balham Area Strategy with great interest. I strongly support any measures taken to put people and the environment first and would love to see a Balham "town centre" established.	Support noted.	No change to the Local Plan required as a result of this representation.
Lloyd Peters				41	Policy PM8	Please consider making the loop comprising Laitwood Road, Ormeley road, Haberson road and Ranmere street a one way system. There are cars parked on both sides of the street with blind corners. People go way too fast around it and I've seen numerous crashes with parked cars. This would cut traffic, make roads safer and given it's such a small loop it wouldn't cause a huge inconvenience.	Comment noted. Policy LP52E establishes that development proposals will need to be demonstrated that they would not cause a road safety hazard. Measures to address road safety are best promoted through the Local Implementation Plan; rather than the Local Plan.	No changes to the Local Plan are considered necessary.
Suzanna Kawalek				50	Policy PM8	I would like to suggest a sign as you enter Balham that says gateway to the south to distinguish it from other areas. Kind Regards	The suggestion does not fall within the remit of the Local Plan.	No change to the Local Plan required as a result of this representation.
Deborah Phelan				152	Policy PM8	Your plans need also to bear in mind the requirements for loading and servicing of the existing sites. Sadly, belief in the Logistics Fairy - which miraculously and invisibly replenishes shop shelves - to often appears to be alive and well.	LP54 Parking, Servicing and Car Free Development sets out the Local Plan's position on servicing.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			224	Policy PM8	People  B. "Development should promote active travel by creating more space for <b>pedestrians walking and cycling</b> "	Comment noted.	Placemaking Policy has been amended.
Jean Millar	Beautify Balham			252	Policy PM8	I am writing to comment on the local plan review in regards to the Balham Area Priorities, on behalf of the Beautify Balham campaign: beautifybalham.org  We are pleased to see that you are planning wider pavements along Balham High Road and the planting of street trees.  We are strongly in favour of this and will offer any support we can to see this implemented.  Also, we are currently in contact with TfL Asset Operations Licensing Team and are proposing lamppost planters along the A24, between Balham Station and Balham Hill. These would be installed and maintained between May and September and will become part of Balham in Bloom, an annual celebration of botanical excellence in Balham.  Could this be something that the council might be able to help fund?  Hildreth Street is cited as hosting a 'popular street market' but there are usually only two regular stalls, the flower stall and fruit and vegetable stall.  It would be good to see other stall holders on a regular basis so that it does become vibrant and diverse. Is there an initiative to encourage new stall holders to this location? Are rents attractively priced?  We are also campaigning for the repair and re-painting of the railway bridge; perhaps including a 'Balham' sign, similar to the one at Earlsfield Station. This would vastly improve the aesthetic of the area.  Council support would give us more leverage in encouraging Network Rail to implement these works.	Support noted.  Specific improvements to the public realm are not within the remit of the Local Plan; however, policy PM 8 codifies the councils support for developments that strengthens Hildreth Street Market.	Placemaking Policy has been amended.
Josephine Vos	Transport for London			725	Policy PM8	Given the high PTAL and opportunities for active travel, all residential and office development should be car free. This should be clearly expressed in policy PM6 and emphasised in all site allocations.  TfL welcomes measures to improve bus speeds and bus passenger waiting facilities as well as improvements to Cycle Superhighway 7 and other cycle lanes.  TfL welcomes the requirement for development proposals to the eastern end of the town centre to reduce the dominance of existing surface car parking. However, this should go further by stating that car parking should be reduced(including removal of any surplus or under-used spaces).	LP54 Parking, Servicing and Car Free Development sets out the Local Plan's position on parking requirements.  The quantum of parking will be assessed on a case by case basis.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Gill Allen				964	Policy PM8	<p>With regards to improvements in Balham Town Centre, I invite you to read through for your perusal in the context of the Draft Local Plan-Balham and comments from locals, this from an email I have written in the past to my Nightingale Ward Councillors in my interest as a long-term local resident since 1997.</p> <p>A case for a bigger public realm in Balham town centre- 'Balham Square.'</p> <p>Many local residents and indeed, many across the wider local area leave for their annual European summer holiday and as a consequence high streets and smaller shopping parades are empty of customers, business and atmosphere during this time. It is generally a mass-getaway to go abroad for most, if not, the entirety of July, August and September. For others, this summer vacation is taken either side of the peak summer period. Away mostly in France, Italy and Spain, departed locals are enjoying the charm of sitting outside in a traffic-free, litter-free, quite spotless, elegant tree &amp; flower-filled village or town square often in the setting of a trickling fountain, perhaps surrounded by sculpture or an art installation with a coffee, chilled glass of wine or meal. It's idyllic. Many of these areas are further enhanced in the evenings as they are adorned with 'fairy' lights and characterful heritage lighting adding to the charm and pull factor. Where is this equivalent in Balham, and why not? The potential space is Sainsbury's car park, a vast, unattractive 1970's parking lot with waste and recycling bins in one corner.</p> <p>Why not incentivise more locals to stay locally by 'delaying' this immediate mass holiday exodus by providing our own equivalent charming &amp; attractive public space; the type which so many have such an appreciation and fondness for on our holidays abroad. We often plan a destination with this in mind as their atmosphere &amp; charm makes us feel relaxed, uplifted and inspired and wanting to spend money but then collectively we return to drab, dull and uninspiring local, public realms, regularly strewn with litter, chewing gum and cigarette butts, busy of traffic, fumes and void of any attractiveness, greenery or colourful hanging flower-baskets.</p> <p>In Balham the obvious location for such a place, is Sainsbury's car park. The framing, proportions and geographic setting are ideal to replicate this same experience of sitting in the shade under a mature tree in these charming and highly atmospheric village and towns squares. Such a transformation would dramatically improve Balham town centre, particularly the aesthetics of the area and be sheltered, be away and out of view from arterial, Balham High Rd. It would provide a drawcard as a pleasant area to socialise and thus be good for local business but in a much more enjoyable way. Additionally, it would provide a car-free public realm to compliment the only pedestrianised (and insufficient) area in Balham town centre, the 'postage stamp' confined, Hildreth Street.</p> <p>This space could potentially have ornamental &amp; mature trees, pockets of contemporary planting &amp; native flowers, a fountain, characterful lighting in heritage Victorian-style lanterns &amp; lamp posts (similar to those in Lambeth's The Pavement &amp; Clapham Common). There could be sections adorned with (solar) 'fairy' lights for dusk and the evenings and areas with attractive seating including deckchairs (in the colour of Balham 'green', sculpture, local art installations, installations showing many of the historic archive photographs &amp; images of Balham from a bygone era, al-fresco cafés, pop-up bars and an allocated space for busking for aspiring musicians. This transformation from its existing state of a 1970-80's parking lot would be more in keeping with contemporary London (and present &amp; future Covid living) and what people desire.</p> <p>Today's Instagram culture is surely a powerful indicator that patrons and the public in general are now more drawn to areas that are highly visually appealing. The social culture of today is of a public which is so visually aware and has a far greater expectation for the surrounds they want to be in. As society switches away from a more consumption 'high street' driven shopping lifestyle to one of, 'experiences' and 'destinations' it is all the more reason a car</p>	Support for BA 1 is noted. The site allocation does require the expansion of the Open Space to the north of the site. Policy. LP 51 contains details of the council's policy regarding the reduction in car usage. The details of any proposal for the site would be assessed as part of an application for planning permission. It is beyond the scope of the local plan to prescribe exactly what should occur in BA 1.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>park of this size, established during another era should now be transformed into an attractive public space to cater for this societal change.</p> <p>The case is even stronger for the transformation of Sainsbury's car park into a 'town square' with anticipated consistent hotter, sunnier summers and milder seasons in the future. In its current state it is a heat trap. Scientists are forecasting London having regular summertime temperatures likened to Barcelona. Indeed in 2020, we experience six days in succession of 34C. Additionally the car park, in its current state, is also a flood trap (for the immediate area and Balham Underground) with more intense rainfall expected in future autumns &amp; winters. Tree planting &amp; more vegetation will help offset this. With this in mind, would it not be even more conducive to provide a welcoming, user-friendly, attractive landscaped green area in Balham town centre as a focal point and destination for locals and visitors to pass through, linger or spend time in under the shade of mature trees having a coffee, light bite, cold drink or perhaps a game of boules or similar.</p> <p>To know of the potential of how such a transformed area would be well utilised outside the August summer holiday period, you only have to witness the sheer volume of locals who (pre Covid) file into Clapham South, Balham &amp; Wandsworth train and Tube stations daily at rush hour of which only a small percentage, despite being locals, currently visit Balham town centre to use in the way described above. Thus, the potential is there for an attractive large, mixed-use public space to be well visited, particular if it is modelled on elements of those in European town &amp; village squares we have such fondness for, or for example, elements taken from the beautiful contemporary landscaped areas immediately surrounding the new US Embassy. The hugely, growing in popularity, contemporary landscaped areas of Coal Drops Yard and Granary Square in Kings Cross is another area to draw inspiration from. Elements of these examples could be incorporated in the design of this new public realm for Balham.</p> <p>Additionally, transforming this area would vastly make the journey more pleasant &amp; healthier by foot each day for those walking from the residential areas east and north-east of Sainsbury's car park to catch trains, Tubes and buses from Balham and then in reverse to return (unavoidably) using the car park as a cut-through. How much nicer would walking on a twice daily basis through an attractive pedestrianised 'town square' be and would also be far more conducive to stopping for a coffee, drink, meal, meeting with friends/colleagues etc in either direction and lingering in Balham town centre.</p> <p>With the anticipated increasingly warmer &amp; sunnier days of the future a beautiful Balham 'town square' on par with the charm of those in Europe would certainly be a local drawcard. It would complement the wonderful local destinations like Tooting Lido (to be particularly well used in the inevitable hot summers of the future) and the whole area even more well utilised and becoming a 'destination' and 'experience' especially if Tooting Lido, Tooting Common, Wandsworth Common and Clapham Common were all interconnected with safe, green and landscaped dedicated 'corridors' to travel between on (E-) bicycles, (E) cargo bikes, (E) scooters &amp; (E) skateboards; the future mode of transport. Shouldn't we envisage and plan our future of Balham and Tooting to be like this.</p> <p>Former Prime Minister, David Cameron during his premiership commissioned a report by Mary Portas on Britain's declining High Streets and public realms. In this report were obvious solutions, many of which exist in the very areas we have such fondness for abroad and plan our travels around, yet Balham's public spaces still fall short of many of the fundamental recommendations within the report. Many councils, including Wandsworth, focus on utilitarian 'improvements' like characterless new paving and the equivalent wooden bollards both of which soon discolour &amp; become scruffy despite crucial attention-to-detail elements that gives a setting its character and charm more often than not, the reason an area becomes successful, popular &amp; consistently well utilised. More solid heritage-style bollards are far more appealing, longer lasting and don't get knocked over or damaged as readily. More care around them is generally taken by drivers. Periodic repainting keeps them smart rather than any costly outright need to replace them regularly.</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The existing limited space of Hildreth Street, roughly a mere 40-odd metres long as the only car-free space, is inadequate for the quantity of people now using Balham town centre whom inadvertently have no choice but to be alongside the traffic-filled Balham High Rd and similar adjacent streets, simply because there is nowhere else provided. Hildreth Street's overhead atmosphere is a canopy of unattractive satellite dishes and the area is void of any (seasonal) permanent flower installations. There are cars regularly parked here late in the afternoon despite it being a pedestrianised area and regardless of patrons still eating and drinking at this time. This is hardly an incentive to have a (part) 'staycation' locally even during long spells of warm, dry and sunny weather. Equally, establishments like Costa Coffee or The Cyclist pub in the setting of traffic-filled Balham High Rd with its poor air quality and similar cafés &amp; wine bars etc on the various busy side roads of Chestnut Grove &amp; Bedford Hill don't provide a pleasant backdrop to stay locally either or spend money in during summer or other seasonal holidays.</p> <p>Balham now has a far greater density of people than 20 or 30 years ago, all the more reason to give people a traffic-free space to move about in, relax and socialise in, especially with a current younger generation who don't use a car locally or even necessarily own one (and are using Zip Cars) but are losing out on a valuable public space because of a bygone era. Why do users &amp; visitors wherever they are in Balham town centre, have to be permanently exposed to traffic and the resulting unhealthy environment. It is constant and unavoidable during access or a visit to any shop, supermarket, restaurant, café or bar.</p> <p>If the argument is against the transformation because sizeable revenue is obtained by renting out the car park in its existing form which then goes back into public services then the counter argument is the sense of well-being and aesthetics the community experiences from such a transformation and the resulting economic benefits it brings to offset the loss. By providing a drawcard in such a prime central space, substantially more money will be spent locally rather than other areas of London and abroad particularly with a hotter &amp; sunnier climate anticipated in the future.</p> <p>Staying locally more frequently also takes pressure off transport, particularly relevant in the current 'climate change emergency' which Wandsworth Council has declared and our challenging legal commitments to reduce CO2 emissions by 2050.</p> <p>It is inevitable that there would be an immediate outcry &amp; resistance by members of the public to remove a large percentage of existing parking but once the transformation (and if done swiftly &amp; courageously and with 'on message' positive communication) has taken place and the public &amp; car users see the visual and dramatic tangible transformation, then the community will quickly start to appreciate the range of benefits such a transformation provides. More so, such an area improves health, wellbeing, brings people &amp; the community together, gets people out of their cars, reduces local traffic &amp; pollution (a huge disincentive for children &amp; the general public to cycle locally). Transforming the area would provide a natural incentive for local people to spend more time locally and thus, be good for local businesses.</p> <p>Statistically shoppers today, are doing daily or more regular, smaller grocery shops than a bigger weekly or fortnightly shop of the past. Thus, less of the need of a car to transport large amounts of groceries. If Wandsworth Council's desire to retain the area in its current form, essentially as a car park for supermarket shopping, is also being naive to the switch in the not-to-distant future away from cars to more sustainable &amp; pollution-free methods of travelling around the local area and across London i.e. (E-) bikes, (E)cargo bikes, (E)scooters etc. It is only right to retain a percentage of the existing carpark for those requiring a car because of reasons of immobility and for delivery vehicles etc. Retaining it in its existing form to allow car users who in reality, are only driving roughly less than a kilometre away is short-sighted in the balance of 'pros and cons' in respect of what it potentially could be and all the subsequent benefits.</p> <p>By transforming &amp; beautifying Sainsbury's carpark, not only as a year-round public realm but is as an incentive for people to stay a while longer locally</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>(particularly with a warmer climate anticipated for London in the future) before heading off abroad or to UK coastal &amp; rural counties. August is challenging financially for local businesses as the Borough temporarily empties of its residents and this would certainly help offset this if this large car park was transformed into a 'destination' public realm.</p> <p>An attractive 'town square' for Balham would fill a missing 'gap' in Balham town centre. It would certainly enhance &amp; compliment and be more in keeping with London's recent classification as a National Park City and the need for more bio-diverse green spaces. Vitally, it would help play a role in reducing London's unhealthy levels of air pollution and finally, help contribute with Wandsworth Borough's role in reducing the UK's CO2's emissions to zero by 2050 as is now enshrined in law. With Wandsworth Council's commendable recent declaration of a 'climate emergency', what better gesture to start to honour this extremely challenging responsibility.</p>		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1523	Policy PM8	<p>PM8 Balham</p> <p>The policy refers to relatively modest growth of least 130 homes by 2037/38. The area includes only one site allocation (BA1 Sainsbury's Car Park, Bedford Hill). However, another site allocation, Balham Health Centre (ref OUT1) is located to the south of the town centre. The allocation refers to mixed use development including residential and expansion of healthcare facilities. The site owned by NHS Property Services. We agree with their representation that there is an opportunity to redevelop the site with the addition of residential use enabling the improvement and expansion of healthcare space, either on site or within the local area.</p>	Support noted.	No change to the Local Plan required as a result of this representation.

## Chapter 11 - Area Strategy for Wandsworth's Riverside

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Michael Atkins	Senior Planning Officer Port of London Authority			1457	11.1	<p>See the attachment on comment 1441 the representation for context Area Strategy for Wandsworth's Riverside: This area strategy aims to set out the overall vision for how Wandsworth's Riverside can improve over the next 10-15 years to become a high quality destination with better connected, new and enhanced public space benefitting the borough and its Thames setting, and supporting future growth. This aim in principle is supported by the PLA. The boroughs five safeguarded wharves are referred to here, with the borough stating that it is important to minimise the conflict between new and old land uses to continue their important function to Wandsworth borough and London. This aim is supported, and it is proposed is replicated within the policy wording for policy LP43 (Protected Wharves) and relevant other area strategies. The context of the policy also recognises the scope to promote and enhance river related recreational activities along the stretch of the Riverside, particularly at Putney Embankment. This is supported by the PLA's Thames Vision which includes the goal to see more people coming to enjoy the Thames and its banks, as well as to see greater participation in sport and recreation on and alongside the river. As part of the Thames Vision, the Putney area in Wandsworth is currently designated as a sport opportunity zone, where there is a lot of activity already taking place including rowing. The vision also recommends that this opportunity zone should be expanded to the entirety of Wandsworth's riverside as an extended sport opportunity zone. The new Local Plan should promote this opportunity and encourage the greater use and access to the River Thames, particularly for sports and recreation in appropriate areas. With regard to this paragraph 11.9 is supported which states that there is scope to promote and enhance river related recreational activities along the stretch of the riverside, particularly at Putney Embankment. In principle support the vision aim to increasing opportunities for people to enjoy and directly interact with the river which is in line with the Thames Vision goal to see more people enjoying the Thames and its banks. Also broadly support the aim on supporting river related activity including for sport, leisure, business and transport uses but consider that the protection and enhancement of the boroughs safeguarded wharves is also highlighted here.</p>	<p>Support noted.</p> <p>Policy LP43 (Protected Wharves) includes a policy requirement that development proposals on sites adjacent to or in close proximity to safeguarded wharves should be designed to minimise the potential conflicts of use and disturbance, in line with the Agent of Change principle set out in the London Plan (Policy D13). The supporting text further notes that these uses should 'minimise the potential for conflicts between the effective operation of the wharves and the new land use'.</p> <p>Reference to the designation of the area around Putney as a 'sports opportunity zone' within the PLA's Thames Vision should be included within the context section.</p>	Reference to the designation of the area around Putney as a 'sports opportunity zone' within the PLA's Thames Vision has been included within the context section.
Ms Susan Jones				274	11.5	<p>In my view, attempts so far to create "activity and vibrancy on the ground-floor" has failed in parts of Wandsworth riverside. For example, in the riverside path between Smugglers Way and the heliport, contains several large restaurants which have closed down and there is very little infrastructure, such as a post office or pharmacy. To my mind, the general feeling is of 'Desolation Row'. There is also the 'hurricane effect' caused by the number of high-rise blocks.</p>	<p>The principle of creating vibrant and active uses which enable residents and visitors to enjoy Wandsworth's riverside is considered to remain an important planning strategy. The policy approach, however, has been amended to ensure that such uses are subject to stronger tests to ensure their viability - including that they could not take up vacant space within the borough's centres. It is noted that the Lombard Road / York Road area remains one in transition, and further redevelopment through residential-led development will increase the viability of such uses.</p>	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			387	11.10	<p>'.... In addition, there is scope for enhancements to existing riverbus services to serve the growing population in riverside developments.' These currently don't run late enough.</p> <p>One place where there is a break in the Thames Path is at the southern end of Putney Bridge where pedestrians and cyclists are forced to navigate the dangerous road crossing before reconnecting with the Thames Path on the Embankment (travelling west) or Church Square (east). Some years ago, The Putney Society came up with a plan for a pedestrian underpass by way of Waterman's Green through vaults under the Lower Richmond Rd connecting with others under the Bridge belonging to St Mary's Church. Whilst available space on Waterman's Green is now very limited as a result of the expansion of the restaurants out onto the Green through their vaults and the Tideway Tunnel's electrical control kiosk which is to be built on the Green, it should be noted that these tables are only on council licence.</p> <p>The Council has plans to reconfigure the road crossing at the end of the Bridge and should also consider widening the pavement on the north side of the Lower Richmond Road to facilitate a shared space for pedestrians and cyclists. At present cyclists often fail to dismount on the narrow stretch of pavement leading to the Embankment causing danger to pedestrians as well as flouting the law.</p>	<p>LP60 River Corridors supports the provision of additional piers for riverbuses as well as the provision of enhanced services.</p> <p>The Putney Spatial Area Strategy map identifies the junction at the southern end of Putney Bridge and the Lower Richmond Road for public realm improvements and active travel enhancements which will make crossing at this area easier and connect the entire Thames Path more cohesively.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Secretary to planning committee Battersea Society			771	11.10	Thames Path Neither the area strategies nor this overarching strategy have much to say about the principles and requirements relating to development along the riverside, beyond some references to the Thames Path. Apart from a few references to the need for improved access to the river, and for active frontages along the Path, there is no reference to the recommendation of the Urban Design Study that "building form must strike a balance between achieving optimal riverfront views without creating a dense wall of development that blocks visibility from buildings and public spaces behind it". Perhaps this is because many existing developments have failed to strike that balance. Nor is there any reference to the policy under LP 54 that the Path should be at least six metres wide, an aspiration that is not met at present on many parts of the Path in Wandsworth.	The recommendations set out in the Urban Design Study have been incorporated into the Plan where possible. The quoted requirement is referenced in policy LP4 and is not repeated in the Area Strategy.  The requirements of LP54 Public Transport and Infrastructure apply to all developments within the borough for conciseness are not repeated in the Spatial Area Strategy.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			774	11.18	RIV1 Former Price's Candles Factory. This site was included in the 2016 SSAD, but the area behind the building occupied by Barker and Stonehouse and to the south-west of Bridges Court Road remains undeveloped. A planning consent for a building of 25 storeys granted in 2017 has now lapsed. That consent is in tension with the statement that buildings will be considered tall if above eight storeys. It is not clear how the requirements set out in the Plan might be met in post-pandemic market conditions.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			775	11.27	RIV2 Dovercourt site, York Road. On this site too there has been little development since it was included in the 2016 SSAD. Although planning consents were granted in 2014 for mixed use developments of up to 15 storeys, these have not progressed. Those consents are again in tension with the statement that buildings will be considered tall if above eight storeys. And again, it is not clear how the requirements set out in the Plan might be met in post-pandemic market conditions. Prospects could well be enhanced if the site were combined with RIV6, the building supplies shed on the other side of Bridges Court Road.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			776	11.36	RIV3 41-47 Chatfield Road. It is difficult to understand why this site is not extended to cover 11-25 Chatfield Road. Consent was given late in 2020 for a development covering both sites, subject to legal agreement; and ideally the allocation should cover numbers 27-39 as well. This piecemeal approach in the Plan does not maximise the possibilities for high-quality development.	The site allocation does include 11-25 Chatfield Road.	Site allocation name has been amended to clarify that the site allocation includes 11-25 Chatfield Road.
Monica Tross	Secretary to planning committee Battersea Society			777	11.45	RIV4 Gartons Industrial Estate. It is baffling that this site allocation does not include the adjacent site RIV10 200 York Road, Travelodge Hotel. RIV4 once more largely repeats the 2016 SSAD, although there have been no proposals for development since then. Joining the two sites together would improve the chances of achieving high-quality development.	In both RIV 4 and RIV 10 the plan highlights the potential for linking these sites together to become a new creative quarter. The current level of integration is deemed appropriate.	No change to the Local Plan required as a result of this representation.
Greystar Europe Holdings Ltd and Big Yellow Self Storage		Nona Jones	Planner DP9	1158	11.52	See attachment for full context of representation. Site Allocation RIV5 We support the retention of York Road Business Centre for mixed-use development incorporating replacement employment floorspace and residential use under Site Allocation RIV5. We agree with the conclusions of the Urban Design Study and Appendix 2 identifying the site as in an area which as opportunities for tall buildings within a local context given the extant consent granting planning permission in April 2019 on site for a part 4-20 storey tower development (ref: 2018/3776) and the scale of developments coming forward in the immediate surrounding area which include the Winstanley Estate regeneration ranging from 3 to 31 storeys which was approved subject to legal agreement on 29 January 2021 (ref:2019/0024) and 100-110 York Road granted permission for the erection of a 25 storey building (ref: 2017/0745).	Comments noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee			778	11.60	RIV6 36 Lombard Road.. See RIV 2.	Comments noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society							
Michael Atkins	Senior Planning Officer Port of London Authority			1459	11.60	See the attachment on comment 1441 the representation for context - Allocation RIV6 36: Lombard Road. Specifically with regard to this allocation, which is designated for mixed use development including residential and replacement employment floorspace it is welcomed that the sites riverside location is recognised and the PLA also in principle support proposal to create a new public space on the riverside enhancing the vestige of the former dock between this site and Falcon Wharf to the north.	Support noted.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1635	11.60	See attachments on 1615 for more detail RIV6 36 Lombard Road This development site has the potential to include estuary edges enhancements to ensure a Biodiversity Net Gain to the riverside. We would like to see this mentioned in this site.	LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.  Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.	LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the Environment Agency.
Monica Tross	Sectary to planning committee Battersea Society			779	11.67	RIV7 Travis Perkins, 37 Lombard Road. This site, also covered in the 2016 SSAD, occupies a prominent position on Lombard Road, Gwynne Road and Harroway Road, and adjoins the Harroway Gardens open space to the east. The building supplies business is busy, and it is not clear that it could be combined with the mixed-use development proposed. Nor is it clear where Travis Perkins could find a similarly-well-connected site elsewhere in the borough.	The site allocation specifies the reprovision of employment space. Furthermore, Travis Perkins would be able to comment on any development that is proposed for the site through the application for planning permission.	No change to the Local Plan required as a result of this representation.
Monica Tross	Serectary to planning committee Battersea Society			780	11.74	RIV8 19 Lombard Road, 80 Gwynne Road. There has been no development on the site since it was included in the 2016 SSAD, and it is difficult to see why developers should come forward with proposals in post-pandemic circumstances. It is also difficult to see how, as suggested in the Plan, the site could be developed to coordinate with and extend the improvements in the public realm associated with the relatively recent development on the other side of Lombard Road without significant improvements for pedestrians crossing that road.	The plan is expected to run until 2038 and so while in the short term development of the site may seem unlikely, the longer term potential of the area justifies its inclusion. The Council agrees that improvements to pedestrian infrastructure would be needed. See LP 51 Sustainable Transport that details the council's support for developments that meet the Healthy Streets objectives.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			226	11.79	This should be a requirement	Comment noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			781	11.83	RIV9 The Chopper P.H., 58-70 York Road. This site, on which a fourteen-storey building is now being erected, should be removed from the site allocations.	Comment noted. The site will remain a site allocation.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			783	11.90	RIV10 200 York Road, Travelodge Hotel. This site, as noted above, should be combined with RIV4, Gartons Industrial Estate.	The site allocation does reference RIV4 as a site which it could be developed with.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			729	11.97	The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.	Comments noted.	The parking requirement has been amended to prevent increases in parking provision.
	Wandsworth Cycling (London Cycling Campaign)			227	11.100	Guidance on is less advanced (has possibly been taken from earlier documents?) The requirement is to replace existing parking spaces (presumably to avoid upsetting residents). Surely an opportunity to making car parking across the estates less dominant. Please include reference to a requirement to provide secure cycle parking provision.	LP54 Parking, Servicing and Car Free Development outlines the Council's policy on cycle parking which would apply to this site	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee			784	11.105	RV12 Randall Close Day Centre and adjacent Surrey Lane Estate Car Park. As noted above, we find it difficult to understand how this site can be regarded as part of Wandsworth's Riverside. The Society has expressed reservations here too about the proposals, now approved, for the erection of three new buildings without providing a detailed consideration of how they might be more effectively	Comments noted.	RIV12 has been reclassified as an Outside Spatial Area site allocation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society					integrated with the rest of the Surrey Lane Estate and the adjoining Mission Hall.		
Josephine Vos	Transport for London			730	11.105	The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.	The parking requirement will be retained in the site allocation as the site is in PTAL 2 and any changes to the amount of parking will be assessed on a case by case basis.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			228	11.109	Guidance on is less advanced (has possibly been taken from earlier documents? The requirement is to replace existing parking spaces (presumably to avoid upsetting residents). Surely an opportunity to making car parking across the estates less dominant? And no mention at all of secure cycle parking provision.	The site will retain parking and changes will be assessed on a case by case basis. LP54 Parking, Servicing and Car Free Development outlines the Council's policy on cycle parking which would apply to this site	No change to the Local Plan required as a result of this representation.
Michael Leigh				43	Map 11.1	The draft plan has the objective, which I support, of "connecting the Thames riverside with Wandsworth Town and the Wandle delta". The access on foot between Wandsworth Town centre and the developments at Point Pleasant/Osiers Road and the Thames pathway is not easy or pleasant. The biggest obstacle is crossing Armoury Way. The town centre is effectively cut off from the Thames and will remain so despite all the nice directional arrows on the draft plan! Although no doubt hideously expensive a way should be found of taking a pathway alongside the Wandle from the bridge in Wandsworth High Street, next the Brewery site, under Armoury Way to join the Thames pathway at the Causeway.	Comment noted. In accordance with NPPF para. 35 the Local Plan needs to be positively prepared, justified, and effective and to meet the test of soundness. The arrows indicate the aspiration for a linkage and future development discussions would explore options to address improving accessibility. No change required	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			770	Map 11.1	<p>11. AREA STRATEGY FOR WANDSWORTH RIVERSIDE</p> <p>Definition</p> <p>This strategy is misnamed. It has relatively little to say about the vast majority of the riverside between Beverley Brook and Vauxhall, apart from one policy relating to the riverside at Putney. Although it is described as an "overarching" strategy, it has nothing to say about the riverside aspects of the strategies for Putney (section 7), Wandsworth Town (4), and Nine Elms (5). On the other hand the strategy includes references to, and site allocations for, areas that are a significant distance from the Thames, including King George's Park (more than 500 metres away), and Randall Close (200-300 metres away). But the key part of the strategy relates to the area between Wandsworth Bridge and the Cremorne Railway Bridge.</p> <p>It would be preferable, therefore, to limit discussion in this section to a comprehensive overview of the public realm and to provide general development management guidance for of the waterfront from Putney to Vauxhall. This would provide a strategic framework for the consideration of employment, and site-specific and employment issues in the relevant subject chapters.</p> <p>In addition there is sufficient development activity in the York Road /Lombard Road block to justify its having an area strategy in its own right. (The identified sites on Map 11.1 support such an approach). This could pick up the omissions in chapter 18 covering these sites, remove the site detail from this chapter on Wandsworth Riverside and give more emphasis to traffic and transport issues along that stretch of York Road/ Lombard Road area than in the draft. These should include the need for a pedestrian and cycle bridge at Cremorne and plans for a study into the desirability and feasibility of re-opening the station at Battersea High Street.</p> <p>The comments below are a response to the consultation draft but we would hope the regulation 19 document could have such a new Area Strategy section for the area between Wandsworth and Cremorne bridges.</p>	<p>The Riverside Strategy should be read in conjunction with the rest of the plan and the Area Spatial Strategies which overlap with this overarching Strategy and provide additional detail for some of the more built up areas.</p> <p>The Lombard/ York Road SPD provides guidance for development in that area and a separate strategy is not required.</p>	<p>Reference to King George's Park has been removed from the Riverside Overarching Spatial Area Strategy.</p> <p>RIV12 has been reclassified as part of the Outside a spatial area site allocation.</p>
Monica Tross	Sectary to planning committee Battersea Society			773	Map 11.1	<p>Site allocations</p> <p>On the low-resolution version of the Plan, the map on page 180 does not show individual sites 1-11. More substantively, we are very disappointed that most of the sites are relatively small (some very small), with no attempt to create clusters (cf the clusters identified for Nine Elms and Wandsworth Town). This is despite the Council's adoption in December 2015 of Supplementary Planning Guidance (SPG) for the Lombard Road/ York Road Riverside Focal Point and</p>	<p>Comment noted.</p> <p>Each site was included as it passed the various sifting processes which were conducted as part of the site allocation selection process, site size was a consideration. Creating clusters was not considered appropriate for this area but several sites do include development considerations to come forward in cooperation with another.</p>	The map has been amended to show all site allocations on the map with reference numbers.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						the commitment in the 2016 SSAD to develop an Area Spatial Strategy, to provide further detailed consideration of this area. The current Plan seems to represent, without explanation, a highly-regrettable step back from that SPG. This is made worse by the exclusion of some sites, including the York Road petrol station and the Access Storage sites.		
Stuart Gulliver	Albion Riverside	LM Durrant	Chairman and Managing Director DPDS	1232	Map 11.1	<p>Wandsworth Local Plan: Full Review -Consultation on the 'Pre-Publication' Draft Local Plan (Regulation 18)</p> <p>DPDS Consulting has been instructed by Mr Stuart Gulliver ('the client') of Albion Riverside to prepare and submit representations to the above referenced consultation. Our client has a specific interest in potential development allocations or policy designations at the riverside location around Battersea Bridge, as development in this area will have an impact on the future amenity of his property.</p> <p>The location of interest falls within the 'Area Strategy for Wandsworth's Riverside' as covered by Section 11 of the Draft Local Plan. The visual plan within this section identifies the location of interest as a 'Focal Point' and recognises that it holds 'Valued views and vistas'. Our client agrees that views and vistas both from and to this location are important.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Kiki McDonough				37	Map 11.12	<p>I live in Henning and I have just been looking through all the plans for the borough of Wandsworth. Every section has a clause about 'Tall Buildings' which is obviously in there so that people will understand that you wish to build tall buildings in most of the building space available.</p> <p>I particularly object to R1V11 Battersea Church Road/Crewkerne Garage where you are going to build ever more tall buildings in that space.</p> <p>The area around Battersea Square and the 'sisters' is constantly being built up and ruining what was once a really pretty area to live. More and more blocks are being built and we are increasingly surrounded by these intimidating tall buildings. The endless building of these blocks causes chaos with the traffic and more and more traffic on the bridges which cannot sustain this amount of traffic for much longer. The amount of people you have crowded into the part around that area has contributed to hundreds more people in the public spaces as green spaces are increasingly being built on.</p> <p>One such case was opposite the heliport where there was a space where children from the council estates managed to place basketball and have some 'breathing space' it is now gone with the inevitable block of flats.</p> <p>It feels like most of the document is a cover for cramming more and more people into these tiny spaces and will in the end suffocate Battersea.</p> <p>I would be interested to talk to a Councillor at the Council and this email will have my contact details. I will wait to see if I get a reply.</p>	<p>The revised approach to tall buildings is consistent with the London Plan.</p> <p>LP52 Transport and Development will require any development on the site to be supported by a Transport Assessment which will need to demonstrate an acceptable impact on traffic for it to be approved.</p> <p>LP56 Open Space, Sport and Recreation does not support any proposal that would result in the loss of sport pitches, playing fields, or land last used for outdoor sport, or which would prejudice the land's future use for sport in terms of quality or quantity of facilities, unless it can be demonstrated that it would provide open space and/or secure public access to private facilities in areas identified as deficient in open space, play space or sport and recreation facilities; and it would meet the priorities identified in the Council's Playing Pitch Strategy, Open Space Study, Active Wandsworth Strategy, Parks Management Strategy or the relevant All London Green Grid (ALGG) Area Framework.</p> <p>LP20 New Open Space will require major developments to provide new public open space on site and make improvements to the public realm and/or provide a financial contribution toward the enhancement of existing public open space and the public realm in the locality if it can be clearly demonstrated that on-site provision is not feasible or appropriate.</p>	No change to the Local Plan required as a result of this representation.
Christopher Hayhurst	Development Project Manager Wandsworth Borough Council: Housing Strategy and Development	Miss Rochelle Flemming	Principal Planner Tetra Tech Planning	1390	Map 11.12	<p><u>Draft Site Allocation RIV11 Battersea Church Road/Crewkerne Court Garage, Somerset Estate, SW11</u></p> <p>Our Client welcomes the inclusion of Site Allocation RIV11 within the new Local Plan, which recognises the Site as suitable for tall buildings within a local context. We acknowledge the Local Planning Authority's ambition to retain the current parking provision, but we consider that the text within Site Allocation RIV11 should be amended to clarify that this does not include the existing parking provision provided by the garages. The garages are leased out to non-tenants and tenants of the Somerset Estate. The garages are dated and not fit for purpose, including being too small to accommodate modern vehicles. As such, we consider that the existing garages should not count towards the existing parking provision on the Site and this should be made clear in the supporting text for RIV11. The RIV11 'Design Requirements' relating to built form, movement, nature and tall buildings are all incorporated in our Client's proposals for redevelopment of the Crewkerne Court Garage site.</p>	Comments noted	RIV11's parking requirements have been amended

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr John Fletcher				543	Picture 11.2	Can we do anything about the housing estate on the NW edge of the park that allows you to drive a Chelsea tractor but requires you to walk a bike?	The council supports active travel, as set out in policy LP 51 Sustainable Transport.	No change to the Local Plan required as a result of this representation.
Michael Leigh				42	Policy PM9	In the recent past, the development of the area bordering the river between Wandsworth Bridge and Albert Bridge has created a pleasant riverside walk and cycling route but created no public places which could enable access to sporting and leisure activity on the river itself. This is very regrettable and although I welcome the declaration at PM 9/D/page 178 that the Council plans to address this deficit, it is difficult to see what this can amount to in practice.  The Thames remains a much-underused resource everywhere in the capital. Wandsworth should work with the Mayor, the GLL and the government to seek ways to rectify this.	Policy PM9 (Placemaking) states the following: 'Opportunities to enhance the experience and quality of the public realm through carefully considered, well designed proposals that can create beautiful, accessible, and inclusive public spaces are encouraged.'. Where appropriate, development proposals will be required to contribute to meeting this objective. More detailed guidance relating to the provision of new public space has been provided in a number of Site Allocations (see ref. RIV1 - RIV12).	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			388	Policy PM9	<b>Placemaking</b>  Para A. 'The existing character of Putney Riverside is strong, with a distinctive sense of place and high quality townscape. Therefore, the strategy is to conserve the character, elements and features whilst enhancing existing features where appropriate.' Supported.Thames  Para G and J. 'Tideway Tunnel .. to create a sustainable and lasting legacy.' Supported. Full reinstatement of Waterman's Green as public space, not just for restaurant patrons.  <b>People First</b>  G. 'The Council will support improvements to .. access to Putney Pier'. Supported. Access to Putney Pier can be impossible at very High Tides. Action on this would be welcomed.	Comment noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee  Battersea Society			772	Policy PM9	Policies for the area  Once more, there is no attempt to relate the repetitive set of nineteen policies to the fourteen principles and themes set out in the overall Placemaking Strategy. Nothing is said about public transport, or about promoting work and opportunity, or facilitating lifestyle choices. It is astonishing that, despite the York/Road Lombard Road area being identified in Section 18 as an Economic Use Protection Zone, nothing specific is said about either protecting or promoting industrial uses. Even worse, the site allocations include several sites (RV1, 4, 6, 7 and 8 for example) which operate successfully at present for industrial use, but nothing is said about protecting or enhancing that use. It is also unclear how the encouragement of arts and cultural activities (as mention in PM9, People First, D) sits alongside the industrial activity. This further argues for separate treatment of this dynamic part of the Borough.	The set of 14 principles set out in the introduction to the Placemaking chapter was used to inform place-based policies for specific areas. Policy PM9 People First includes a number of criteria/requirements which are linked to active travel and transport. Policy PM9 People First includes a number of criteria/requirements which can be linked to promoting work and opportunity, and facilitating lifestyle choices principles.  The industrial heritage of the area, and its transformation to support contemporary economic uses, is addressed within the Context, which identifies that existing employment floorspace should be retained and that existing industrial uses could provide intensified and modernised industrial facilities. It is agreed, however, that this does not clearly translate to a policy position within PM9. This is because the approach to the use of economic land within both Economic use Protection Areas and Focal Points of Activity is clearly outlined within Policy LP38 (Mixed Use Development on Economic Land). A linkage between these approaches should be included in PM9.  Industrial spaces can be well suited to the use as cultural and creative workspace, such as through provision for artists and makers. The suitability of maker spaces as those which are suitable alongside residential provision is recognised in the Context section. Policy LP 41 (Affordable and Managed Workspace), part D also outlines this requirement. That notwithstanding, it is agreed that further detail could be provided on the type of cultural users that could locate in this area.	Amend PM 9 (Smart Growth) to explicate the Local Plan position on economic uses within the Wandsworth Riverside Spatial Area, linking these to the appropriate general policies, and to provide greater detail on cultural users.
Josephine Vos	Transport for London			728	Policy PM9	All developments with a PTAL of 4 or above should be car free and this should be clearly expressed in policy PM9 and emphasised in all relevant site allocations.  We welcome the support for river transport for both passengers and freight, and improved walking and cycling routes along the riverside and connections to the surrounding area.	LP54 Parking, Servicing and Car Free development outlines the Council's position on parking.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Stuart Gulliver	Albion Riverside	LM Durrant	Chairman and Managing Director DPDS	1233	Policy PM9	<p>The proposed Area Strategy for Wandsworth is encompassed by a single emerging Policy PM9 (Wandsworth's Riverside) which sets out expectations with regards to 'placemaking', 'smart growth' and a 'people first' approach to development in this area.</p> <p>With regards to smart growth, the policy states that residential-led development will be promoted in the Focal Points of Activity, alongside a mixture of uses to increase activity and vibrancy along the riverside. The policy adds that these should be of a small-scale which is appropriate to serving local needs, an approach which our client agrees with.</p> <p>The placemaking part of the policy emphasises at part F that 'New development along the riverside should conserve and enhance the quality of the built and natural environment as identified through the designated heritage status of the area, the architectural quality of its buildings and preserve important local views and vistas, as identified in the visual plan'. Our client strongly agrees with this approach but would suggest that reference is also made in a relevant part of the policy to emphasise that any new development should also be compatible with existing/surrounding land uses and not have a detrimental impact on the amenity of the area (including existing properties and businesses), both through construction and operational phases.</p>	Support noted. LP2 (General Development Principles) sets out how any development in the borough must not adversely impact the amenity of current or future neighbours. See the full policy for more detail.	No change to the Local Plan required as a result of this representation.
Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1524	Policy PM9	<p>PM9 Wandsworth's Riverside</p> <p>The policy notes that much of the riverside between Wandsworth and Battersea Parks has been redeveloped. However, a number of sites present opportunities for targeted growth. 'Smart Growth' Clause A refers to the potential for sites to provide at least 3,210 homes by 2037/38. Twelve site allocations are proposed in the area. All the sites are considered appropriate for mixed use, with some already having planning permission or subject to current applications. It is unclear what mixed uses are envisaged. The Council's public health team and HUDU on behalf of the CCG have responded to individual planning applications to assess the site-specific impact of proposals, but we would welcome the opportunity to assess the cumulative impact of development in the area.</p>	Comment noted.	Site capacity information added to the Local Plan
Michael Atkins	Senior Planning Officer Port of London Authority			1458	Policy PM9	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy PM9: Wandsworth's Riverside.</p> <p>Support part A of the policy with regard to providing a high quality public realm along the riverside. As part of this it is considered that the policy is expanded to include a specific reference to the vital need to provide appropriate riparian lifesaving equipment (such as grab chains, access ladders and life buoys) alongside riverside areas in line with the PLAs Safer Riverside guidance (2020) for development alongside and on the tidal River Thames (<a href="http://pla.co.uk/Safety/Water-Safety/Water-Safety">http://pla.co.uk/Safety/Water-Safety/Water-Safety</a>). The PLA also considers that there is need for suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support) to be provided as part of new development along the riverside. This is supported by the Drowning Prevention Strategy (2019) produced by the Tidal Thames Water Safety Forum including the PLA, RNLI and emergency services.</p> <p>Within the 'smart growth' section of the policy, the PLA supports part D which states that development proposals to improve facilities and encourage further use of the river for recreation will be supported. Part E of the policy is also broadly support with regard to supporting the use of the river for transport purposes however it must be made clear that this refers to the use of the river for both the transport of passengers as well as large and small scale freight directly in the policy, as well as include a reference to the boroughs safeguarded wharves and other landing points and the protection of these sites. Note that this is also linked with part G of the 'people first' section of the policy on supporting opportunities for increased water-based travel and use of the water for business in line with the requirements of the emerging London Plan.</p> <p>Under the 'people first' section of the policy, support the references to the need for development proposals to increase and enhance public access to the</p>	<p>Comments noted</p> <p>LP43 Protected Wharfs sets out the protections for safeguarded wharfs along the river.</p>	<p>LP61 Riverside Uses, Including River Dependent, River-related, and River Adjacent Uses has been amended to include a specific reference to the vital need to provide appropriate riparian lifesaving equipment (such as grab chains, access ladders and life buoys) and suicide prevention measures where appropriate alongside riverside areas.</p> <p>PM9 has been updated to clarify that river transport for passengers and small and large freight will be supported.</p> <p>LP61 Riverside Uses, Including River Dependent, River-related, and River Adjacent Uses has been amended to include reference for the use of the river for bulk materials during demolition and construction stages.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>riverside especially in areas such as Putney, Wandsworth Town and Clapham Junction town centres.</p> <p>For the various allocations highlighted in this section, the PLA supports the references to the need to enhance and create new links to riverside areas. In addition for these allocations and all other allocations in the Local Plan situated in close proximity to the tidal Thames, it is considered there must be a reference included in the movement section of these allocations on the need to ensure that the use of the river for bulk materials during demolition and construction stages, including via the supply chain is robustly taken into account, in line with emerging London Plan policy S115.</p>		
Christopher Hayhurst	Development Project Manager Wandsworth Borough Council: Housing Strategy and Development	Miss Rochelle Flemming	Principal Planner Tetra Tech Planning	1392	Policy PM9	<p>Dear Sir</p> <p>REPRESENTATIONS TO THE WANDSWORTH DRAFT LOCAL PLAN –REGULATION 18 CONSULTATION ON BEHALF OF WANDSWORTH BOROUGH COUNCIL: HOUSING STRATEGY AND DEVELOPMENT</p> <p>On behalf of our Client, Wandsworth Borough Council(WBC): Housing Strategy and Development, we submit representations to the Wandsworth Draft Local Plan –Regulation 18 consultation.</p> <p>WBC Housing Strategy and Development, as part of its “1,000 New Homes Programme” has committed to deliver 1,000 new Council homes, including 600 affordable homes, over the next five to seven years, across the borough. The homes will be built to meet local housing needs and demands.</p> <p>Our Client has identified two sites to deliver new homes at Crewkerne Court Garages, Battersea Church Road and garages at The Alders Estate, Streatham Park. Consultation with the local residents and statutory consultees has been undertaken since July 2019 to inform the design of the two developments. The development at the Alders garages site was submitted for Planning in late February 2021. Further review and design work is being carried out on the Crewkerne Court Garages design.</p> <p>The Crewkerne Court Garages Site is located within the Wandsworth’s Riverside Area of the Draft Local Plan and is covered by Draft Site Allocation RIV11.</p> <p><u>Draft Policy PM9 Wandsworth’s Riverside</u></p> <p>Our Client supports the approach to placemaking within the Wandsworth Riverside Area, as set out in Draft Policy PM9. The requirement for new development to “have a distinctive character that creates remarkable landmarks” and “provide excellent and inviting public realm as part of a coherent strategy rather than spaces between buildings” is reflected in the design for the redevelopment of the Crewkerne Court Garages site. The buildings proposed fronting Battersea Church Road will create a land-marker for this area of Battersea, while respecting the existing character of the surrounding area. The scheme also provides high-quality public realm through considered landscaping, a children’s play area, the re-provision of the improved MUGA and a pedestrian link between the two proposed buildings to provide a green link to the existing open space of the Somerset Estate.</p> <p>The proposed development at Crewkerne Court Garages will also make a meaningful contribution towards the 3,210 homes target to be provided in the Wandsworth’s Riverside area by 2037/38.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1634	Policy PM9	<p>See attachments on 1615 for more detail</p> <p>PM9 Wandsworth’s Riverside</p>	The supporting text for LP12 Water and Flooding sets out that the requirements of TE2100 should be considered as part of the implementation of current and future improvements to the River Thames tidal flood defences in order to effectively manage tidal flood risk over the plan period.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The policy doesn't include much on biodiversity and protecting, and enhancing this to ensure proposed developments provide a Biodiversity Net Gain for the river banks and green infrastructure along the Thames. The policy could aim to ensure Biodiversity Net Gain is achieved by making existing green spaces available for delivery of enhancements either from developments or delivery of TE2100 strategy, in partnership with the Council. Wandsworth Park and Battersea Park in particular could both be scoped for what they could contribute to achieving net gains for biodiversity whilst retaining their historic character and design.</p>	<p>Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.</p>	

## Chapter 12 - Area Strategy for the Wandle Valley

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Cllr Graeme Henderson and Cllr Jo Rigby				921	12.1	We would support the development of "A Local Plan for the Wandle Valley", providing its scope was much wider than just the industrial or economic activities within the Valley and addressed issues such as residential planning, the provision of the infrastructure and services necessary to sustain the local community and measures to encourage "Active Travel" (see below), reduce pollution and improve air quality.	It is considered that themes such as residential planning, infrastructure, air quality and active travel are adequately covered by general policies of the Plan. In addition the Area Strategy sets out a holistic approach that will steer development activity and direct locally sensitive action to improve the quality of life for local people.	No change to the Local Plan required as a result of this representation.
Caroline Marston	Martson Properties	Mr Paul Watson	Phillips Planning	850	12.1	<p><b>See attachment for context on comment 849</b></p> <p>7. Chapter 12 of the draft plan sets out the strategy for the Wandle Valley. It highlights the strategic importance of the Wandle Valley (WD) from both an environmental and economic perspective. It further recognises that there are opportunities for intervention that could "realise greater environmental benefits whilst retaining and supporting the area's economic role" (12.1) and that a key objective for this area should be "protecting the strategic reservoir of industrial land and premises within the area, while creating opportunities to intensify this provision." (12.12)</p> <p>8. The plan notes that much of the building stock in the area is reasonable or good quality but acknowledges that "there are also examples of poorer quality buildings, particularly in the Lydden Road LSIA, which could be redeveloped to provide facilities which are more fit for purpose." (12.4) MP fully support this assessment and holds a keen interest in taking forward redevelopment proposals within Lydden Road</p> <p>9. The southern portion of the Lydden Road LSIA is then discussed in paragraph 12.5 where it is highlighted that this has been re-categorised as an 'Economic Use Intensification Area (EUIAs). It states that "this designation seeks to intensify the economic use of this underutilised land, encouraging investment in modern industrial premises alongside the provision of residential uses and business floorspace."</p> <p>10. Whilst it is acknowledged that this southern portion of the former LSIA (now EUIA) has been assessed as holding greater potential to include elements of residential use than the Lydden Road section, there seems no clear or justifiable reason to preclude office development within the Lydden Road area. Office uses could very comfortably sit above the existing industrial and warehouse uses and deliver the values necessary to make redevelopment a worthwhile and viable prospect for the owners.</p> <p>11. Clearly there should be no loss of the industrial floorspace currently within this area. MP does not seek to make any such case. Rather it is submitted that the existing industrial uses could be retained and supported with enhanced premises and significant environmental improvements as a result of the value provided by the office development above.</p> <p>12. Bringing higher value uses into the area in addition to the industrial uses would drive up the quality of the buildings and in turn improve the quality of street scene within what is noted as an important link between the residential areas to the east and the Wandle Valley Urban Open Land and trail to the west as highlighted below.</p> <p>Extract from the Wandle Valley Proposals Map (Page 199 of the draft plan)</p>	See response to comment number 854, which addresses this issue more fully.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						13. MP considers that if the Plan proceeds on the basis that existing uses may intensify but provides no flexibility / incentive to landowners in terms of mixed uses including offices it is very unlikely that the redevelopment which is hoped for and is a stated objective for this area will ever come forward. There must be some benefit to the owners to redevelop and providing better quality higher buildings will not be viable if these can only be let to industrial and warehouse uses.		
Dr John Fletcher				546	12.6	Fix this, please. I've been as far as Morden Hall Park with the kids but travelling north it isn't possible to go any further than King George's park.	Comment noted.	No change to the Local Plan required as a result of this representation.
Cllr Graeme Henderson and Cllr Jo Rigby				928	12.6	Para 12.6 of the Area Strategy states correctly that the Wandle Trail, that defines the Wandle Valley, 'is forced to continue to Garratt Lane' between Summerley St and Penwith Rd. Whilst the paragraph recognises that 'Providing effective and sustainable transport links along the Valley is integral to its success' it does not provide a solution.  This is critical to providing safe, sustainable and healthy, active travel for the whole area.  A plan has been developed between local residents, community organisations, local developers and the Council to provide a solution to the 'Missing Link' that will ensure continuity to the Wandle Trail along or parallel to the Wandle river. The Council should give its full support to this venture and commit to completing this in the Local Plan.	Policy PM10 (People First) sets out the Council's support for development that improves the Wandle Trail, in particular by completing the missing link highlighted as part of your comment.	No change to the Local Plan required as a result of this representation.
Mr Andrew MacMillan				238	12.12	Garratt Lane currently severs the walking link between King George's Park and the residential area to the East. More pedestrian crossings should be installed to ensure the park is accessible from the East. The removal of parking spaces for the new cycle lanes should better enable this. Given the proximity of excellent local transport links, car parking should be disallowed for all new developments in the area. King George's Park and Garratt Lane would both benefit from further tree cover and bio-diversification with no impact on sports amenity, whilst providing additional tree cover, shade and water retention. The southern end of King George's Park lacks nearby play space for young children, with the closest significant formal play space 1km to the north and south.	The council supports developments that meet the Healthy Street objectives. See LP 51 Sustainable Transport for full details. LP 53 Parking, Servicing and Car Free Development also has details on the council's support for car free development.  LP 55 Protection and Enhancement of Green and Blue Infrastructure shows the council's support for the protection and expansion of green and blue infrastructure across the borough, not just in large open spaces, but as smaller interventions that help to green the borough's streets.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1637	12.13	See attachments on 1615 for more detail  WV1 Riverside Business Centre and Former Bingo Hall, Bendon Valley  The wording needs to state that a 10m wide habitat buffer should be the aim for the River Wandle, including the restoration of natural banks, and in-channel restoration, to deliver a Biodiversity Net Gain to the river.	Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text.	Policy LP60 has been amended to reiterate the requirements for set backs from LP12 Water and Flooding.  LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.
	Wandsworth Cycling (London Cycling Campaign)			230	12.19	replace "pedestrian" with "walking and cycling route" x 2  The footbridge must accommodate walking & cycling	Comment noted.	Site Allocation amended to reflect active travel requirements.
Dr John Fletcher				544	Map 12.1	Is there a plan to fix the Earlsfield gap in the Wandle trail?	The context section for the Wandle Valley acknowledges that this gap needs to be amended for the Wandle Trail to be complete. There are no specific plans in the Local Plan to address this.	No change to the Local Plan required as a result of this representation.
Dr John Fletcher				545	Map 12.1	Is there a plan to fix the Earlsfield gap in the Wandle trail?	The context section for the Wandle Valley acknowledges that this gap needs to be amended for the Wandle Trail to be complete. There are no specific plans in the Local Plan to address this.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Emma Broadbent	London Rivers Officer South East Rivers Trust			261	Map 12.2	Site Allocations: WV1 Riverside Business Centre  As with recommendations for other Site Allocations, we recommend not less than 10 m be left between development and the river bank. The materials used for the riverside walk should be carefully selected so that they facilitate ecological interactions across the river bank buffer zone and do not present a barrier to wildlife.	LP57 Biodiversity requires new developments to not have an impact on borough's designated sites of habitat and species importance. A 10m buffer is not considered necessary.  LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.	No change to the Local Plan required as a result of this representation.
	Wandsworth Cycling (London Cycling Campaign)			229	Policy PM10	People First  A. This must be a requirement for planning  B. This must be a requirement - it must be a strategic priority for cycling in the borough  G. What are the next steps? Some of the riverside walk/cycle route needs a bit of attention and there is scope for more points to get on and off it. This would need joint work with Merton. Would additional bridges be useful?	Cycling is a strategic priority for the borough and the policies throughout the plan support this. See LP 51 (Sustainable Transport). PM 6 (People First) A shows support for improving the riverside walk/cycle route. The council will produce a duty to cooperate report that outlines how the council has been working with other bodies, including other London councils.	No change to the Local Plan required as a result of this representation.
Cllr Loveland	Labour Group			642	Policy PM10	We welcome the aspirations of the strategy to further enhance the value of the River Wandle and to ensure continued provision of employment uses. This should recognise the modernisation of the many industrial estates to ensure there are sufficient premises suited to modern, light commercial activities. The Strategy should be amended to recognise the importance of Garratt Lane, which runs the length of the Valley and includes Earlsfield Station and Earlsfield local centre and several valued community assets that serve the local and wider residential community.  3   Page Much of Garratt Lane is given over to shops that have been badly affected by successive Covid 19 lockdowns and need to be regenerated. Investment in the public realm and enhanced links to the Wandle should be recognised as part of the vision for the area. Additionally, recent major development notwithstanding, the predominant domestic scale of buildings in the area should be recognised, meaning that beyond the identified locations tall building would not be acceptable. We also ask that the commitment to complete the 'Wandle Trail' between Summerley Street and Penwith Road and eradicate the 'Missing Link' should be included in policy PM10.	A key objective of the Area Strategy is to "protect the strategic reservoir of industrial land and premises within the area, while creating opportunities to intensify this provision". The inclusion of reference to their modernisation is therefore implied, but it is agreed that this could be made explicit. This should be reflected in the objectives and policy requirements.  The representation is correct to identify the important role of Garratt Lane and Earlsfield local centre. These have not been included within the Area Strategy due to the relatively more limited scope for change that is anticipated over the Local Plan period, and planning policy considerations for these areas are therefore addressed by the Local Plan's topic-based policies, including changes in the policy approach to help revitalise high streets and reduce vacancies within centres (LP 45) and for the appropriateness of tall buildings (LP 4). It is noted that no other local centre has a dedicated area strategy other than Roehampton, which is included due to the large-scale regeneration of the Alton Estate.	Amend the objective and relevant policy requirement (under Smart Growth) to make reference to the need to modernise industrial units as part of a strategy of intensification.
Caroline Marston	Martson Properties	Mr Paul Watson	Phillips Planning	852	Policy PM10	<b>See attachment for context on comment 849</b>  <b>Policy PM10 – Wandle Valley</b>  14. Subsection (B) of the draft policy advises that:  "B. Designated industrial land within the Wandle Valley will continue to provide a strategic reservoir of land for economic uses, including logistics, services and industry, and land for waste management, and will be protected in this capacity.  The intensification of industrial uses within such locations, through the more efficient use of space and the development of multi-storey schemes is supported.  15. This aim is fully supported, however, as outlined above the Policy is unlikely to deliver the stated objective of improving the appearance of the area and delivering additional employment development as it does not provide a sufficient incentive for owners to invest in the area.  <b>Key Link</b>  16. MP does not seek to further a case for the inclusion for residential uses as are now permitted in the adjoining EUJA but does seek flexibility to allow office use on upper floors provided that it can be	See response to comment number 854, which addresses this issue more fully.	No changes to the Local Plan are considered necessary.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>demonstrated that this would in no way prejudice the stock of existing industrial floorspace.</p> <p>17. In this regard, the properties on the south side of Lydden Road also benefit from a frontage onto Bendon Valley to the south side. This provides a clear opportunity to access industrial uses at ground floor level from Lydden Road with office uses above accessed from the south off Bendon Valley. Bendon Valley forms the northern edge of the newly categorised 'Economic Use Intensification Area (EUIA) and it is clear that access to higher quality office uses adjacent to the EUIA would provide a better relationship with, transition and outlook from that area which will include residential and offices uses.</p> <p>18. We request that an additional section is added to Policy PM10 (B) after "The intensification of industrial uses within such locations, through the more efficient use of space and the development of multi-storey schemes, is supported" to read: "New office uses (Class E) will be supported within the Lydden Road LSIA at first floor level and above where this forms part of a comprehensive site redevelopment that would deliver clear visual and environmental benefits to the area and would not result in any loss of industrial floorspace."</p> <p>19. It is respectfully our submission that this is a minimum requirement if the Council has a genuine desire to see redevelopment and enhancement in this location.</p>		
Margaret Brett	Southfields Grid Residents' Association			1408	Policy PM10	<p>Page 197 PM10 F4: we think the reference to King George's Park's use should be specifically limited to community rather than allowing commercial use. Southfields Grid adjoins the heritage park, Wimbledon Park, and we have seen the destruction that can be caused by over-commercialisation.</p> <p>Although we understand that this is a vision for change and development we are facing a time of possible radical change to the planning regime. We think that the opportunity should be taken, at this point, to encourage the identification of more conservation areas thus strengthening the protection of our heritage and local character.</p>	<p>The policy states that the following measure have the potential to improve the park specifically for local communities. The proposals listed are focused on benefiting the local community through improvements to the park infrastructure and curation of cultural events.</p> <p>The designation of a conservation is a formal process which is separate from the Local Plan review.</p>	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1460	Policy PM10	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>8. Area Strategy for the Wandle Valley</p> <p>Policy PM10: The Wandle Valley</p> <p>Support part C of the 'placemaking' part of the policy which states that new development along the Wandle Valley should respect the small scale of the river corridor and improve public access and provide positive frontage to the riverside.</p> <p>Under the 'people first' section of the policy, support the intention in part A to support improvements to pedestrian and cycling accessibility within the river corridor, to Wandsworth Town and the Wandle Delta / Wandsworth's Riverside. In addition, also support part C here which promotes the preservation and enhancement of the special character of River Wandle as a valuable recourse for wildlife and biodiversity, including wildlife corridors and green chains.</p>	Support noted.	No change to the Local Plan required as a result of this representation.
Rachel Holmes	Planning Advisor Environment Agency			1636	Policy PM10	<p>See attachments on 1615 for more detail</p> <p>PM10 The Wandle Valley</p> <p>The text needs to be much stronger in its wording to state that new development adjacent to the river must aim for a Biodiversity Net Gain and provide at least a 10 metre buffer of river and bankside habitat corridor. Developments must assess the current condition of the river and aim to restore natural features where possible. Improved access along the riverside must not</p>	<p>LP57 Biodiversity requires new developments to not have an impact on borough's designated sites of habitat and species importance. A 10m buffer is not considered necessary.</p> <p>Biodiversity Net Gain and the Environment Bill are considered in LP57 Biodiversity and supporting text. LP57 Biodiversity also requires developments that will have an impact on species or habitats to demonstrate there is no alternative site and mitigate any impact on or off site. Additionally, LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the environment Agency.</p>	<p>LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the Environment Agency.</p> <p>The supporting text of LP60 has been amended to require all management plans for riverside public spaces to include aims to restore riverside habitat and in-channel habitat where desirable.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>lead to a loss of biodiversity and must therefore ensure that there is no increase in lighting or disturbance to the river overall, by ensuring a net gain in biodiverse habitats.</p> <p>Existing green spaces along the river should be scoped for providing potential sites for the delivery of Biodiversity Net Gain along the river where other urban sites are unable to achieve a significant uplift. The policy should state that all management plans for riverside public space must include aims to restore riverside habitat and in-channel habitat where desirable.</p>	<p>A Biodiversity Strategy has been prepared and a Biodiversity Action Plan is forthcoming that will consider green spaces along the river which could be used for Biodiversity Net Gain.</p>	
Tony Burton	Wandle Valley Forum			1741	Policy PM10	<p>We welcome inclusion of an Area Strategy directly addressing the Wandle Valley and recognising its value as a strategic resource. We warmly welcome the commitment to complete the Missing Link in the Wandle Trail at Earlsfield which complements Merton's draft Local Plan Projects TN22 and TN23 on the borough boundary.</p> <p>We believe Policy PM10 can be strengthened by:</p> <ul style="list-style-type: none"> <li>• Strengthening the Placemaking role of new development to require it to deliver a net gain in biodiversity – this is consistent with the enhancement expectation of Policy LP60</li> <li>• Addressing the need for work on the Wandle to contribute to naturalising the way it functions, as supported by London Plan Policy S117 and the Wandle Catchment Management Plan</li> <li>• Requiring pedestrian priority in any plans for improving permeability and access along and across the river for active travel</li> <li>• Recognising the role of Wandle Valley Forum and Wandle Trust (SE Rivers Trust) alongside Wandle Valley Regional Park Trust in supporting and delivering change and providing partnership</li> <li>• Recognising in the historic significance of the Wandle itself and its related weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal</li> <li>• Requiring development to create more opportunities for local people to manage and run buildings and open spaces along the Wandle</li> </ul> <p>We believe the Area Framework needs to be supported by:</p> <ul style="list-style-type: none"> <li>• A Masterplan for the Wandle Valley to support delivery of the Area Strategy in the same way as is being provided for Wandsworth Town</li> <li>• Acknowledging the complementary priority to be attached to delivery of the Wandle Valley's Catchment Management Plan</li> <li>• Addressing the relationship with the All London Green Grid within the policy and not only the supporting text, consistent with the approach in Policy PM9</li> <li>• Identifying the area of Wandle Valley Regional Park, including showing it in the Policies Map as is done for both Merton and Sutton's Local Plans, and echoing Merton's Local Plan policy (CS5 (adopted Local Plan) and O8.7 (draft Local Plan)) for a 400m buffer zone</li> </ul>	<p>Support welcomed.</p> <p>Comments have been taken into account in revising PM10 and other policies which have been strengthened.</p> <p>Biodiversity Net Gain will be expected in all new developments as part of the Environment Act 2021. PM10 does recognise the importance of the organisations such as Wandle Valley Forum which commits the Council to further ongoing engagement.</p> <p>LP49 Sustainable Transport supports the Healthy Streets objectives which aims to provide greater amounts of active travel wherever possible.</p> <p>LP53 Protection and Enhancement of Green and Blue Infrastructure requires areas identified in the All London Green Grid be enhanced accordingly.</p> <p>The importance of the Wandle Valley Regional Park when considering development proposals has been acknowledged in Policy PM10.</p>	<p>Comments have been taken into account in revising PM10 and strengthening other policies.</p>

## Chapter 13 - Site Allocations Outside the Spatial Areas

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Sectary to planning committee Battersea Society			785	13.7	13. SITE ALLOCATIONS OUTSIDE THE SPATIAL AREAS  OUT2 259-311 Battersea Park Road: There is no reference to the new up market retirement development currently nearing completion, and which is unlikely to be redeveloped in foreseeable future. It is essential that a library be reprovided as it is an important facility at a considerable distance from other libraries. While a street frontage might be desirable, it is essential that off-road parking be provided if there is a replacement supermarket. It does not make sense to treat the whole site as a single one for new development (though obviously needs to be coherent overall). It needs to be broken up into separate elements where comprehensive redevelopment would make sense, e.g. shops plus library.	LP54 Parking, Servicing and Car Free Development sets out the Council's policy on parking and servicing for all new developments which would apply to these site allocations.  The site is not expected to come forward all at once but that the uses outlined in the allocation are met over time.	Reference to the retirement village has been included
Josephine Vos	Transport for London			731	13.13	Any redevelopment of this site should take the opportunity to reduce car parking and ensure that it does not exceed London Plan maximum standards.	Comments noted.	OUT3 Roehampton Vale has been removed from the Local Plan as a site allocation.
Isabella Jack	Sustainable Development Advisor Natural England			1609	13.14	<b>See attachment on comment 1608 for context and appendices</b>  Natural England is pleased to see that Richmond Park SAC and Wimbledon Common SAC have been considered in the Local Plan. We welcome that Natural England's services have been highlighted for site allocations in close proximity to the SACs and look forward to working alongside the LPA and developers to ensure that appropriate consideration is given to stag beetle habitats during the development process. However, we note that for site allocation Roehampton Vale (OUT3), that while the proximity to Richmond Park SAC is considered, Wimbledon Common SAC, which is adjacent to the site, was not mentioned. We believe it would be pertinent to adjust the wording to reflect that both designated sites will be considered.	Comments noted.	OUT3 Roehampton Vale has been removed from the Local Plan as a site allocation.
Josephine Vos	Transport for London			732	13.19	The introduction of new uses should be car free, and the opportunity taken to reduce any existing parking to cater for operational use and Blue Badge holders only.	Comments noted.	OUT4 Wandsworth Prison has been removed from the Local Plan as a site allocation.
Monica Tross	Sectary to planning committee Battersea Society			786	13.25	OUT5 Bridge Lane Medical Group Practice This site was not included in the 2016 SSAD, and it is difficult to understand why it is included in the present Plan. The medical practice works effectively, there have been no proposals for development since 2010, and it seems unlikely that any proposals will come forward in the foreseeable future. There is no reference to the previous permission (which has probably now expired). We are concerned that new development would be too high even at 6 storeys to be sympathetic to the conservation area. The site is at an important junction and benefits from the space it provides within the streetscape	The allocation has been brought forward following the owner expressing an interest in its redevelopment to help expand the healthcare facilities.  The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. Site Allocation OUT5 has not been identified as having opportunities for either tall or mid-rise buildings.	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			733	13.25	The introduction of new uses should be car free, and the opportunity taken to reduce any existing parking to cater for operational use and Blue Badge holders only.	See LP 53 for policy on car parking	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			787	13.32	OUT6 Haydon Way The site is not, as stated, "currently" used as a care home; it was abandoned many years ago, and the building is considered unsuitable for that purpose. It clearly needs to be redeveloped, but in ways that are sensitive to the surrounding buildings and their residents. The site is not suitable for the kind of co-living development which was refused in 2020; and in line with Policy LP 31, this should be explicitly stated in the site allocation.	Comment on the current use of the site is noted.  The approach to managing developing proposals for co-living schemes is set out in Policy LP31 (now LP29) and is not repeated in this Site Allocation.	Amend 'Site Description' to clarify that the site is currently vacant; however, the lawful use of the premises is a care home.
Malcolm Souch	Project Director NHS London Healthy Urban			1525	Map 13.1	Site Allocations Outside the Spatial Areas Two other site allocations are located close to the Wandsworth Riverside area. The site at Bridge Lane Medical Group Practice, 20 Bridge Lane (ref OUT1) is owned by NHS Property Services and has potential for mixed use development including residential and health use. We note their representation in relation to this site allocation and agree	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Development Unit (HUDU)					that there is an opportunity to redevelop the site with the addition of residential use enabling the improvement and expansion of healthcare space.		
	NHS Property Services Ltd			1465	Map 13.1	<p>Please see attached document</p> <p>Site Allocations Outside the Spatial Areas</p> <p>OUT1 Balham Health Centre</p> <p>Balham Health Centre is allocated for a mixed-use development including residential and expansion of healthcare facilities. Balham Health Centre is an existing operational purpose-built health facility. 600 sqm out of a total GIA of 1,050 sqm is in use for GP and Community health services. The remaining c.400sqm is in use for admin. While the site is well used, it is currently underutilised in terms of development capacity and represents a good opportunity to improve the urban fabric while providing a mixed-use development and housing. The site itself is in the freehold ownership of NHSPS and we have been working to understand development potential in light of health care requirements. NHSPS therefore support the proposed allocation of this site in principle and given the urban context, close to Balham centre, there is potential to intensify the existing land use and provide a high-quality building and much needed residential dwellings. The development of this site will allow for investment in new healthcare buildings and services for the community. In cases where there is an aspiration to redevelop an existing healthcare facility, with enabling residential development funding new or improved healthcare facilities, the NHS requires that sufficient value is generated to pay for the new or improved healthcare facilities. A viability assessment will be used to establish reasonable development quantum and type to ensure the NHS can deliver a new healthcare facility. Such an approach would be in accordance with draft Policy LP25. Further, the greater the site's development potential, the greater value can be derived for investment in essential health services. NHSPS would therefore support an allocation which allowed development up to 5 storeys in height. NHSPS support the principle of the proposed redevelopment of the site and seek to ensure that the site is allocated within the New Local Plan. To guarantee the allocation is sound, by being sufficiently flexible to ensure there is no risk to the deliverability of a healthcare facility and new housing, a suggested amendment is provided below;</p> <p>Nature-suitable Existing trees and green space must be reprovided on site.</p> <p>Tall Buildings-...development of <u>above</u> 5 storeys <del>and above</del> is likely to be inappropriate...</p> <p>More generally, the allocation should provide flexibility for the services to be re-provided elsewhere and the site be used for residential use only. Any relocation would involve improving services, potentially co-located/integrated with other uses and in a more accessible location in accordance with commissioning requirements. To achieve this, a suggested amendment is provided below:</p> <p>Site allocation: Mixed use development including residential and expansion of healthcare facilities <u>with enabling residential development, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area.</u></p>	<p>The requirement for the re-provision of trees and green space is considered sufficient for this site allocation.</p> <p>The site allocation requires the re-provision and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	No change to the Local Plan required as a result of this representation.
Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1526	Map 13.2	We note that the site at 259-311 Battersea Park Road (ref OUT2) has potential for mixed use including residential, community uses, including health, retail and the provision of a new public library. The site boundary includes the Doddington Health Clinic which is owned by St George's University Hospitals NHS Foundation Trust. The site boundary excludes Battersea Fields Practice premises in Austin Road. The NHS Trust and the CCG are in discussions with	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						the Council and other stakeholders regarding development options combining the library, health clinic, retail units and Tesco site into an integrated solution.		
	NHS Property Services Ltd			1483	Map 13.5	<p>OUT5 Bridge Lane Medical Group Practice</p> <p>Bridge Lane Medical Group Practice is allocated for a mixed-use development including residential with re-provision and expansion of healthcare facilities and parking. The Practice is an operational health facility with 630 sqm out of a total GIA of 940sqm in use for GP and Community health services. The site is well located, close to local amenities in Battersea and represents a good opportunity to intensify the existing land use on site. As with Balham, the site is in the freehold ownership of NHSPS and we have been considering development options in light of health care requirements. NHSPS therefore support the proposed allocation of this site. Options have included re-provision of the existing health facility and enabling residential and/or a wholly residential scheme, subject to healthcare commissioning requirements. Any value generating residential development on this site will allow for reinvestment in healthcare services, consistent with our earlier comments on Balham Health Centre. NHSPS therefore support the principle of the proposed redevelopment of the site and seek to ensure that the site is allocated within the New Local Plan. To guarantee the allocation is sound, by being sufficiently flexible and to ensure there is no risk to the deliverability of a healthcare facility and new housing, a suggested amendment is provided below;</p> <p>Nature-suitable Existing trees and green space must be re provided on site.</p> <p>NHSPS support an allocation of between 5 and 6 storeys. A development of this type is considered achievable, making the best use of this underutilised brownfield site. As with Balham Health Centre, it is important that the allocation wording is sufficiently flexible to support the Council's and NHS development aspirations for the site. We would therefore suggest the following amendments to the allocation wording:</p> <p>Site allocation:</p> <p>Mixed use development including residential and expansion of healthcare facilities with <u>enabling residential development, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area.</u> We would also point out that parking provision should be reflective of any future development and current policy requirements. The allocation should not seek to expand provision.</p>	<p>Support for the allocation is noted.</p> <p>The requirement for the re-provision of trees and green space is considered sufficient for this site allocation.</p> <p>The site allocation requires the re-provision and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.</p> <p>LP17 states that in accordance with a strategy relocation provision may be acceptable across the borough boundary.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	No change to the Local Plan required as a result of this representation.
	Dandi Five Ltd Dandi Living	Mr Mark Thomson	Associate Director Savills	1080	Map 13.6	<p>These representations relate to Hazel Court, Haydon Way, Battersea, London SW11 1YF ('the site') which Dandi Living own the freehold. The site comprises a single-storey octagonal shaped former nursing home building, with a lawful C2 (Residential Institutions) use. The site boundary measures 0.22 ha. The site is identified in the Plan and is subject to proposed allocation ref: OUT6.</p> <p>Background</p> <p>Dandi Living are a co-living operator and developer with a dedicated approach to co-living that aims to address the key challenges of today's urban living. The way we live is changing. Urban accommodation in the 21st century is no longer about static housing or climbing the traditional 'property ladder' model, that has grown out of balance with current social-economic norms. Even the supposedly more flexible rental market offers high barriers to entry, and a poor value proposition.</p> <p>The target audience are sociable people seeking an innovative home and way of living, and a community that offers access to shared experience, the product is mostly sought by age category 30-45yrs +5yrs. The aim is to make luxurious</p>	<p>Application ref. 2020/2560 was assessed against the adopted Local Plan, whereas Site Allocation OUT6 forms part of a new Local Plan. Development proposals for large-scale purpose-built shared living accommodation will need to be assessed on their own merits at the time when a planning application is submitted. The circumstances of the site might change over the plan period, and it is therefore not proposed to allocate the site for large-scale purpose-built shared living accommodation.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	The description has been amended.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>living available at a price previously perceived by our residents as unattainable. Dandi Living submitted a planning application (ref: 2020/2560) relating to Hazel Court for the "Demolition of existing building and the erection of a part 2 and 6 storey building comprising 159 co-living rooms (Sui Generis) including internal amenity space (with flexible events and community floor space), external amenities spaces (with external roof terraces at second, fourth and fifth floor levels), landscaping, plant, refuse and bicycle stores, and associated works "was recommended for approval by Officers, but refused at Planning Committee in December 2020. An appeal has now been submitted to the Secretary of State and is pending (ref: APP/H5960/W/20/3266181). Representations1.Site Allocation (OUT6) The Plan proposes to allocate the site for a "mixed use development including residential and open space". The site allocation has been included within Appendix 1.</p> <p>2Whilst it is welcomed and supported that the site has been allocated for development, we request minor amendments to the allocation which seek to reflect the evidence and technical work undertaken relating to the site as part of the recent planning application (Ref: 2020/2560). Site Allocation (OUT6)</p> <p>Amendments</p> <ul style="list-style-type: none"> <li>• Site Allocation (amend with new wording underlined as set out below) "Mixed use development including residential (inc. co-living accommodation)and open space"</li> <li>• Site Description(amend with new wording underlined as set out below)"The site is east of Wandsworth Town Centre and west of Clapham Junction. It is north of St John's Hill and is bounded to the east and north by Haydon Way. The site is adjacent to a variety of residential and community uses and has a lawful use as a care home, however this has been closed since September 2015"</li> </ul> <p>Tall Buildings (amend with new wording underlined as set out below)"In accordance with the Urban Design Study and the tall buildings maps in Appendix 2 the height at which buildings will be considered as 'tall' is 5-storeys, and developments of 5 storeys and above will need a convincing justification to demonstrate the appropriateness of the site to accommodate a tall building. Development proposals for tall buildings will be assessed in accordance with Local Plan Policy LP 4"</p>		

## Chapter 14 - Achieving Design Excellence

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Tom Coates				100		General Achieving Design Excellence Comment There is no comment on what the minimum EPC rating will be for new residential buildings. It would be useful for this to be outlined.	This matter is addressed through policy LP10.	No change to the Local Plan required as a result of this representation.
Miriam Howitt				110		General Achieving Design Excellence Comment The principles, aims and considerations are well-covered with the exception of Global Warming in the building process. There is no reference to a preference for re-purposing existing buildings over demolition, particularly of concrete structures. There is no suggestion of choice of building construction methods and materials to avoid emissions or un-necessary transport.	Policy LP10 requires developments to achieve high standards of sustainable design and construction to mitigate the effects of climate change. This includes the use of sustainable construction methods, such as the use of sustainably sourced and recycled materials. It is proposed to add a criterion to this policy to promote the retention of existing buildings in renewal and regeneration projects where this is a sustainable option.	Criteria added to LP 10 to promote the retention of existing buildings in renewal and regeneration projects where this is a sustainable option.
Mr Robert Arguile	Chair The Putney Society			299		General Achieving Design Excellence Comment <i>Development will be expected to maximise opportunities to deliver ground floor active frontages with a focus on non-residential uses, particularly in town centre locations.</i>  Both LP1.8 and 14.11 are directly contradicted by the current government extension of PD to change use class E to C3. We support the policy, but how can it be made effective? Omit 'particularly'. Why should development in wholly residential settings not have residential ground floors?	The supporting text makes it clear that both residential and non-residential active frontages are acceptable.  Since the draft Local Plan was published, the Government have introduced further changes to Permitted Development Rights enabling the change of use from E Class to C3 will undermine this strategy (subject to certain limited prior approval criteria). The Council are considering proposals to take forward an Article 4 Direction to limit the extent of this PDR with respect to office uses, which now fall under Class E. It is noted, however, that the Government have consulted on proposed amendments in the NPPF for the use of Article 4 Directions, which would - if taken forward - seek to place greater restrictions on their implementation. It is also worth noting that Permitted Development Rights enabling the change of use from E Class to C3 only apply when certain criteria are met.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			301	14.17	14.17. There is no true privacy in urban gardens. Roof terraces and balconies should be encouraged when they are often the only potential private outside space available to flats.	Comment noted.	No change to the Local Plan required as a result of this representation.
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1394	14.27	Pg 216 14.27 <i>'The Council has a duty to conserve and enhance the significance, character and appearance of the borough's historic environment when carrying out its statutory functions and through the planning system.</i>  SGCORA concurs with this aim, but it must be part of practice. The 'brutalistic', utilitarian, high-rise buildings allowed in Wandsworth Town Centre, especially in the last 10 years, are incongruous & highly detrimental to the Georgian, Victorian & Edwardian elegant Town Centre buildings.  Elsewhere in the Borough, LP3 14.27 appears to have been ignored, e.g. in the Battersea Power Station development, where there is no attempt to reference the building materials or style/period of the Power Station. Its distinctiveness is completely subsumed.	The application of policies is a Development Management issue rather than a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1395	14.30	Pg. 217 14.30 <i>'The Council will collate information on the borough's historic environment including maintaining up to date Conservation Area Appraisals and Management Strategies'</i> SGCORA expects the Planning Dept to strengthen the requirements on residents to adhere to our Conservation Area distinctive qualities when our next Appraisal & updated Management Strategy takes place.	Comment noted.	No change to the Local Plan required as a result of this representation.
H Monger	Director London Historic Parks and Gardens Trust			1239	14.32	Para 14.32 & Para 14 36 We welcome recognition that the heritage assets of the borough include registered and undesignated sites.	Support noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
H Monger	Director London Historic Parks and Gardens Trust			1240	14.36	Para 14.32 & Para 14.36 We welcome recognition that the heritage assets of the borough include registered and undesignated sites.	Support noted.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1305	14.45	- A height limit for tall buildings (no more than the current tallest building) (14.45)	Comment noted. The appropriate/maximum heights for tall building zones should be defined in line with London Plan Policy D1.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				140	14.48	14.48 Does not really define what justifies something (usually excessively tall) to claim to be a landmark when other buildings do not qualify for the designation. Generally, seems to be given to the Council's favourite developer with who they have a "relationship".	Comment noted. The reference to 'landmark buildings' was removed as a result of other amendments to the policy.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1320	14.51	What is the housing SPD that the council have prepared (14.51).	This comment refers to Housing SPD adopted in November 2016.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			306	14.52	Equalling the original height can detract from character less than artificially subordinate.	Comment noted. The existing wording is considered appropriate.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1321	14.54	Does the council commit to ensure that "alterations and extensions are sensitive to their local historical context" (14.54)	Policy LP5 seeks to ensure that alterations and extensions respect the local character.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				141	14.55	Commendable that not causing harm to amenity during construction is added to this policy.	Support noted.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1322	14.55	Would developments that do not need planning permission still have things such as flooding risk being assessed by Building Regulations inspection in these cases (14.55)	The requirements set out in this policy apply to development proposals which require planning permission, or in certain cases a prior approval.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1323	14.67	Can the supplementary planning document be provided to allow evaluation on the effects of this policy on Putney (14.67)	The Council are considering the development of Small Sites SPD. This would require a public consultation exercise which would seek local residents' views on the SPD.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1315	14.68	Any new shops should be designed so they can be readily adapted to alternative uses to account for changes in high street use. (14.68)	This is generally a private issue rather than a matter for the Local Plan to address. There is no justification to include such requirement.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1316	14.70	Preference should be given to local businesses and local issues, such as apprenticeships, applications for affordable housing etc, for advertising. (14.70)	The is not a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1317	14.70	Preference should be given to local businesses and local issues, such as apprenticeships, applications for affordable housing etc, for advertising. (14.70)	The is not a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			304	Map 14.1	<p>Why is the whole Carlton Drive area considered suitable for tall? Ditto Ashburton Estate. If this is simply the result of recent GPDO changes, say so. Much of the lightest tint '<i>within a local context</i>' seems to reflect where extra floors will be allowed by the 2020 GPDO changes (e.g. Ashburton Estate and Carlton Drive), but then strays too far. All of the sites along the Upper Richmond Road (A205) west of Putney Cross fall within the West Putney Conservation Area. Do you really think extra height backing on the Old Burial Ground is in any way appropriate?</p> <p>The '<i>town centres</i>' tint extends too far east along the Putney Bridge Road. Stop at the PUT2 &amp; PUT3 site allocations. Any more will impact on two conservation areas.</p> <p>Sainsbury's site will adversely affect light and privacy to surrounding buildings if above 4 floors.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p>	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			298	Policy LP1	<p><i>LP1.A.6 Ensure that the proposed finishing materials and façade design (such as the degree of symmetry, variety, the pattern and proportions of windows and doors, materiality and their details) demonstrate an appreciation and understanding of vernacular, local character and architectural precedents in the local area.</i></p> <p>New, and fails to include the NPPF requirement 'whilst not inhibiting innovative design.'</p> <p>Picture 7.2 on page 129 commends a successful development that doesn't 'fit in'. What proportion of case officers have a sufficient understanding of English construction traditions to judge this? There are perhaps no more than a dozen buildings in this Borough that are vernacular.</p> <p>This is in conflict with Chapter 15.2 and forthcoming changes to building regulations Part L.</p> <p><i>LP1. A.7 Provide a mix of uses including local services and facilities to support daily life. Agreed</i></p> <p><i>LP1. A.8 Maximise active frontages / ground floor uses facing main pedestrian routes, having regard to the location of the site.</i></p> <p>Agreed but this is contradicted by Site Allocations which seem to want active frontages at the back of sites as well. Stick to the main routes. <u>See comment on policy PM5.</u></p> <p><i>LP1. A.13 Provide high quality public art as an integral part of the design of new major developments, particularly around gateway locations and where they benefit legibility. The Council will only permit development for artworks, statues, or memorials where they protect and enhance the local character.</i></p> <p>Make up your minds!</p> <p><i>LP1.B The Council will promote good urban design by encouraging:</i></p> <ol style="list-style-type: none"> <li>1. <i>use of its pre-application service.</i></li> <li>2. <i>developer-led public engagement in advance of the submission of a planning application.</i></li> <li>3. <i>the design review of appropriate major schemes; and</i></li> <li>4. <i>the development of masterplans.</i></li> </ol> <p>If this is to be effective it needs to say 'requiring' not 'encouraging'. But requiring pre-app is dangerous when you don't have the staff to deal with current workload.</p> <p><u>The targets in para 15.2 will impact on all development decisions.</u> All consents for adaptation, upward extension and change of use should be subject to conditions requiring zero carbon upgrades to the <u>whole</u> building because <u>now</u> is</p>	<p>It is agreed that the policy should clearly state that innovative design will not be prevented or discouraged.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The wording of LP1.A.13 is considered appropriate. However, it has been moved to policy LP20 (now LP18).</p> <p>The wording of LP1.B is considered appropriate. The proposed changes fall outside the remit of planning policy.</p> <p>Policy LP1 does not seek to resist proposals which affect the appearance of original building in order to bring improvements to energy efficiency.</p>	Part A.7 of policy LP1 amended to include a reference to innovative design.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						the last chance in many cases to get work done to these buildings before 2030. Design policy needs to recognise that in most cases serious upgrading of energy efficiency cannot be done without affecting the appearance of buildings.		
Monica Tross	Sectary to planning committee  Battersea Society			788	Policy LP1	<p>14 ACHIEVING DESIGN EXCELLENCE</p> <p>LP1 Urban Design</p> <p>1. It is unclear what the development principles set out here will mean in practice. Point 4 talks of 'edges defined by buildings'. Too often buildings cover their entire site and sit uncomfortably close to often narrow pavements and roads. Point 9 should include a requirement that there is off-road provision for servicing, deliveries, set down and pick up and for disabled parking. Most roads in Battersea are heavily trafficked and the Council's aim should be to avoid all on-street stopping and parking along main roads.</p> <p>Point 12. In order to be fully accessible, buildings should have good disabled parking provision on site not on the roadway.</p> <p>We query the practical value of the term 'high quality public art'. How is this determined? Could the RCA engage with the public on this?</p> <p>The actions proposed by the Council to promote good urban design may be good in theory, but they are often unsatisfactory in practice. Response from public engagement events and from the Design Review Panel often has little impact on the application presented – which is then regularly approved. Details of pre-application advice should be made publicly available. Masterplans are subverted, as in the case of the South London Mail Centre Site, both by the selling on of sites with no requirement to follow the masterplan, and by the many reserved matter applications. This problem is compounded by the lack of regular review of the cumulative effect of changes, as well as the need for continued review of changes to individual sites, and a lack of encouragement for public input to amendments.</p>	<p>The wording of Part A.4 of policy LP1 has been informed by the recommendations set out in the National Model Design Code, and therefore is considered appropriate.</p> <p>Policy LP53 (now LP51) requires adequate off-street servicing arrangements to be made for commercial vehicles and general servicing. Policy LP53 (now LP51) also provides adequate guidance in relation to disabled parking.</p> <p>Public Art will be implemented in line with the Wandsworth Arts and Culture Strategy 2021- 2031.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p>	No change to the Local Plan required as a result of this representation.
Josephine Vos	Transport for London			931790	Policy LP1	<p>TfL welcomes the encouragement of active travel and improved permeability. A useful cross reference could be made to the Healthy Streets Approach.</p> <p>Point 9 should state that ground floor design should give priority to providing high quality and safe access for people on foot and cycle rather than vehicle access.</p> <p>In line with Policy T6 in the London Plan, Parking Design and Management Plans should be required where parking is provided. The Mayor will be issuing guidance on this shortly.</p>	It is agreed that ground floor design should provide high quality and safe access for pedestrians and cyclists.	Policy LP1 expanded to ensure that ground floor design provides high quality and safe access for pedestrians and cyclists.
Susie Morrow	Chair Wandsworth Living Streets			654	Policy LP1	<p>1.World-class design</p> <p>Within the London and national context, we expect the dLP, and its policies, to strive to ensure that any new developments across brown-field sites, town centres, open spaces and legacy streets are ambitious, learn from and use best practice, and enable decision makers, including officers and councillors, to make decisions that are entirely consistent with the Local Plan. Each major new development should learn and apply the lessons from recent developments within the Borough and elsewhere, including for enabling, and even demanding developers deliver BREEAM "Outstanding" buildings for example. We would like to see planning policies that are aspirational for both the Council and Developers alike and go beyond merely facilitating the delivery of standard scheme developments.</p> <p>Imagery to enable aspirational development</p> <p>We note that the dLP is quite a "wordy" document punctuated with imagery of existing spaces across the Borough. We would like to see more visual examples of best practice throughout the document to elevate everyone's expectations of what is possible. The dLP is about creating things that people</p>	The purpose of the Local Plan is to set out a local authority's policies and proposals for land use in their area. Visual examples of best practice would not necessarily strengthen the objectives of relevant urban design policies. It is considered that visual examples of best practice would be better suited to a Supplementary Planning Document.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						can see, touch and feel – we would like to see this better reflected in this document using visualisations of best-in-class examples of large-scale developments, buildings and places, from Wandsworth and around the World.		
Cllr Graeme Henderson and Cllr Rigby	Earlsfield Labour Party			931	Policy LP1	<p>“Child Friendly” Estates and developments</p> <p>LP 1 – Urban Design</p> <p>We also believe that new developments should be “child friendly” and build into the project facilities that children and young people will use to good purpose, particularly to maintain their health and well-being and fitness and combat lack of physical activity and obesity. The dramatic rise in knife crime is due to a number of complex factors, but one is the lack of facilities for young people, particularly on estates, which can lead to boredom and anti-social behaviour. We would particularly commend the approach taken in “Neighbourhood Design – Working with children towards a child friendly city”. This report, published by ZCD Architects with the backing of RIBA looks in detail at an estate in East London. It involves intensive engagement with local children setting it firmly in the context of their lives. It includes evidence, principles, practical advice and urban design. It provides a replicable approach that can be scaled up, aimed at achieving the built environment aspects of the child-friendly city initiative.</p> <p>We also believe that the Council should provide assistance and encouragement to residents who wish to periodically close their streets, at minimum or no cost, to provide a safe environment for local children to play and for residents to congregate. We believe that the concept of “Open Space” should be broadened away from not just parks or Commons to extend to the urban environment and to turn residential and other roads into much more friendly environments for people to enjoy.</p> <p>Where the planning application results in any change to road layouts, school children from Year 7 upwards should be invited to participate in consultations on traffic schemes affecting their commuting routes</p>	<p>In accordance with policy LP19, new major residential developments and mixed use schemes with a residential component will be required to make on-site provision for 10sqm of dedicated play space per child. London Plan policy S4 sets out additional child-friendly design guidance. This can be referenced in policy S4.</p> <p>Open Spaces do consider civic spaces as part of the wider open space provision in the borough. The Council have taken steps to temporarily pedestrian streets such as Northcote Road and Hildreth Street. More are being considered.</p>	Policy LP19 expanded to ensure that development proposals for schemes that are likely to be used by children and young people satisfy all requirements set out in London Plan policy S4
Julie McPhillips				975	Policy LP1	I find the buildings surrounding Battersea Power station also really ugly and out of place in their surroundings. Lots of talk about climate etc but still throwing up glass buildings that simply radiate and reflect heat. How about bringing some of the residents of the Borough on board who may have a better of design and integration.	The application of policies is a Development Management issue rather than a matter for the Local Plan to address. Planning applications are subject to a statutory 21-day consultation process, which gives an opportunity to interested parties (such as neighbours) or statutory consultees to review the proposals and make comments.	No change to the Local Plan required as a result of this representation.
Julie McPhillips				984	Policy LP1	I didn't see anything relating to policing the streets or offering any solution to the knife crime and gang culture that has been growing in our Borough over recent years. I think this needs consideration as at the moment this proposal reads like something out of an Aldous Huxley novel.	Policy LP1 requires development proposals to minimise opportunities for crime and antisocial behaviour including terrorist activities in a site-specific manner, based on an understanding of the locality and the potential for crime and safety issues.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1318	Policy LP1	We would like further clarification on: - How solar panels and wind turbines fit into Urban design (LP1)	<p>Proposals for renewable technologies will be assessed in line with policy LP10. The supporting text of policy LP10 states that renewable technologies such as photovoltaic cells, solar panels, ground and air source heat pumps and other forms of renewable energy are likely to be appropriate in many parts of the borough, subject to other policies within this Plan.</p> <p>Policy LP3 supports the principle of climate change mitigation alterations and adaption responses within the historic built environment when the development is designed accordance with established conservation best practice.</p>	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1319	Policy LP1	We would like further clarification on: - How solar panels and wind turbines fit into Urban design (LP1)	<p>Proposals for renewable technologies will be assessed in line with policy LP10. The supporting text of policy LP10 states that renewable technologies such as photovoltaic cells, solar panels, ground and air source heat pumps and other forms of renewable energy are likely to be appropriate in many parts of the borough, subject to other policies within this Plan.</p> <p>Policy LP3 supports the principle of climate change mitigation alterations and adaption responses within the historic built environment when the development is designed accordance with established conservation best practice.</p>	No change to the Local Plan required as a result of this representation.
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1297	Policy LP1	<b>See attachment on comment 1294 for full representation and context</b>	Support noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>LP1 - Urban Design and LP2 - General Development Principles</b></p> <p>We support the Councils objectives to deliver high quality of design for all buildings and spaces in the borough. We are pleased to note that the Council has not sought to explicitly define what constitutes high quality design and instead has set out a series broad guidelines and principles that can be applied when consider the details design of individual proposals</p> <p>This approach aligns with that as set out by the New London Plan Publication Version (2020) Good Growth agenda and we support the two policy documents working together creating certainty for developers when considering new schemes.</p>		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1527	Policy LP1	<p>Local Plan Strategic Policies</p> <p>LP1 Urban Design We support clause 7 which seeks to ensure that development proposals provide a mix of uses including local services and facilities. In addition we suggest the following wording 'and to ensure that the design of buildings and spaces minimise environmental impacts and promote active design' (see clause 6 of Policy LP15) to recognise the role of urban design in preventing ill health and promoting healthy lifestyles.</p>	This requirement is already stated in policy LP15.	No change to the Local Plan required as a result of this representation.
Diana McCann	Boroughs Coordinator The Blue Green Economy			1428	Policy LP1	<p><b>LP1 Urban design – Point 10</b></p> <p>Suggest include wording 'consider incorporation of Integrated Water Resource Management (IWRM) with Blue Green Technologies (BGT)'. As it is a 15-year plan include wording 'as evidence emerges about and details are generated in planning frameworks for 'Climate Responsive Urbanism', these should be considered in development plans (possibly Point 2).</p>	Comment noted. The use of the term SUDS is a general term which could already include IWRM or Blue/Green technologies. It is considered that the term SUDS is well understood and is consistent with the wording of the NPPF. The appropriate level of attenuation would be assessed within a detailed Flood Risk Assessment as part of an application. The wording of the policy is considered appropriate, setting out the aim for 100% attenuation. All flood risk measures including the techniques suggested could be included as part of a Flood Risk Assessment and would be considered in the same vein as more traditional techniques.	No change considered necessary for the Local Plan
Alan Pates				28	Policy LP2	<p>LP2. General Development Principles.</p> <p>The Council have declared a climate emergency and I would applaud this as long as this is more than words. If they are really serious about tackling this problem measures to address energy use etc should be front and centre</p> <p>LP2 and LP3. Historic Environment, residential alterations etc.</p> <p>A large area of the Borough has been classified as a Conservation Area. These areas contain in the main part average quality examples of old buildings. With the climate emergency any Borough that is serious about tackling this issue cannot really afford the luxury of the mass preservation of old buildings of average quality just because they are old. The policy ought to be encouraging energy conservation measures and spell out that the alteration of some aspects of the character of conservation areas is necessary and acceptable. External insulation with render cladding is going to have to be allowed in streets in conservation areas where buildings are currently brick faced. Eaves lines and ridge lines will alter but if this is to reduce the energy consumption of the property then this should be allowed. If the Council wish to retain the illusion of brick faced buildings by using brick slips on insulation rather than render, then they will need to provide grants for this in the areas where they do deem that this is so important. If the Council is concerned about the cost of this then they could ask the electorate whether they deem the preservation of brick facades worth the cost if they do or the cost to the planet if they do nothing.</p> <p>There is a nationwide debate to be had on the natural conflict between keeping buildings looking like they do and energy consumption. Successive governments have shied away from confronting this issue. Wandsworth have declared a Climate Emergency and so should be taking the lead. We are all going to have to accept changes to our neighbourhoods and changes to the way we go about our daily lives to save the planet. The longer we leave it the more draconian those changes are going to have to be. If this matter had been addressed even only twenty years ago we would not be having to face drastic</p>	<p>In accordance with the NPPF, when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest. It is considered that all conservation areas in Wandsworth meet the above test. Policy LP3 does not prevent development in conservation areas. Instead it requires development proposals to sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset.</p> <p>Policy LP3 states that the principle of climate change mitigation alterations and adaption responses within the historic built environment will be supported when the development is designed accordance with established conservation best practice.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						changes now and if it is put off by another ten years, it could be devastating in not even the worst case scenario.		
Mr Robert Arguile	Chair The Putney Society			300	Policy LP2	<p>Generally in line with much used old Policy DMS1. Could be more specific on 'unacceptable' which has proved open to widely varying interpretation. We suggest 'significant'.</p> <p>This policy needs a requirement to maximise reduction in lifetime CO2 and to prioritise reuse to conserve embodied carbon.</p> <p>LP2.A.5. Most uses of the word 'and' should read 'or' otherwise it needs all these impacts to refuse also</p> <p>'disturbances during construction and demolition' should be separated as in LP.2.A.6 to divide long term from short term impacts to relate more directly to LP14.</p>	<p>The use of word 'unacceptable' is considered appropriate. Further guidance is provided in the supporting text of the policy.</p> <p>Policy LP10 sets out requirement to ensure that developments contribute to reducing carbon dioxide emissions.</p> <p>The wording of part A.5 of policy LP2 is considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			789	Policy LP2	<p>LP2 General Development Principles</p> <ol style="list-style-type: none"> <li>1. It would be great if the principles relating to the effects on neighbours as well as on current and future occupiers and users were adhered to. Much of Nine Elms fails to meet these standards.</li> <li>2. The requirements relating to transport infrastructure ignore the fact that it might not be possible to add additional transport infrastructure for the foreseeable future. The Council and TfL should provide a time-scale for upgrades to Clapham Junction, added capacity on the overground, additional bus services and any start to Crossrail 2</li> </ol> <p>C In relation to the impact on existing users in Town Centres, it seems inevitable that Nine Elms in general and the Power Station development in particular will have a negative impact on other town centres within Battersea.</p> <p>We note 14.15 that living conditions will be protected 'as far as possible'. We query how 'on-site' judgements can be made before buildings are in place.</p>	<p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>Currently TfL does not know the timescales for Crossrail 2 but is continuing to pursue it. Improvements to Clapham Junction and the overground network will come forward as and when they are prepared.</p> <p>The wording of paragraph 14.15 is considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1300	Policy LP2	<p>14 Achieving Design Excellence We would make the following suggestions:</p> <ul style="list-style-type: none"> <li>- For general development we would like the inclusion of 'is not visually intrusive' as part of the subjective requirements (LP2)</li> </ul>	The wording of policy LP2 is considered appropriate. Design requirements are adequately covered in policy LP1.	No change to the Local Plan required as a result of this representation.
Axis Construction		Joseph Hickling	Planner Boyer Planning Ltd	1217	Policy LP2	<p><u>Draft Policy LP2 -General Development Principles</u></p> <p>2.1In principle, this draft policy is supported. However, it should be revised to render it more effective as a tool for managing development.</p> <p>2.2At part A2, the draft policy states that "Proposals will be supported where the development avoids unacceptable levels of overlooking (or perceived overlooking) and undue sense of enclosure".</p> <p>2.3The policy relates specifically to "the amenity of existing and future occupiers or that of neighbouring properties or prevent the proper operation of the uses proposed or of neighbouring uses".</p> <p>2.4It is recommended that the policy should highlight the benefits overlooking can have in certain instances, for example, within a single development where future occupiers have clear sight of amenity spaces and can therefore provide natural surveillance.</p> <p>2.5It is therefore recommended that section A2 of draft Policy LP2 is re-written as follows: "avoids unacceptable levels of overlooking (or perceived</p>	Agreed.	Policy LP2 expanded to specify that unacceptable levels of overlooking (or perceived overlooking) and undue sense of enclosure should be avoided onto the private amenity space of neighbouring properties.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						overlooking) and undue sense of enclosure onto the private amenity space of neighbouring properties;"		
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1298	Policy LP2	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP1 - Urban Design and LP2 - General Development Principles</b></p> <p>We support the Councils objectives to deliver high quality of design for all buildings and spaces in the borough. We are pleased to note that the Council has not sought to explicitly define what constitutes high quality design and instead has set out a series broad guidelines and principles that can be applied when consider the details design of individual proposals</p> <p>This approach aligns with that as set out by the New London Plan Publication Version (2020) Good Growth agenda and we support the two policy documents working together creating certainty for developers when considering new schemes.</p>	Support noted.	No change to the Local Plan required as a result of this representation.
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1528	Policy LP2	<p>LP2 General Development Principles</p> <p>We support Clause B which seeks to ensure that development takes into account existing or planned social and transport infrastructure and contributes to the provision of additional infrastructure where necessary. However, we suggest that the word 'ensure' is replaced with 'demonstrate' to ensure that an assessment of existing and planned capacity is carried out and necessary mitigation is secured. In terms of planned capacity, reference could be made in paragraph 14.20 to the infrastructure delivery plan which will outline a list of infrastructure projects some of which will be reliant on developer contributions.</p>	Agreed.	<p>Part B of policy LP2 revised to strengthen the wording.</p> <p>The supporting text of policy LP2 revised to include a reference to the Infrastructure Delivery Plan.</p>
Michael Atkins	Senior Planning Officer Port of London Authority			1461	Policy LP2	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>9. Achieving Design Excellence</p> <p>- Policy LP2: General Development Principles.</p> <p>Support in principle the aim of the policy which states in part A that development proposals must not adversely impact the amenity of existing and future occupiers or that of neighbouring properties or prevent the proper operation of the uses proposed or of neighbouring uses. Part C is also supported which states that development must take into account the operational needs of existing businesses and not prejudice the activities of existing uses/operations. This is particularly important for the boroughs safeguarded wharves which can operate for up to 24 hours a day throughout the year in line with the tides. New development located in close proximity to these wharves must take this into account as part of the design of new developments, in line with the Agent of Change Principle, introduced in paragraph 182 of the NPPF, which states that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Diana McCann	Boroughs Coordinator The Blue Green Economy			1429	Policy LP2	<p><b>LP2 General development principles</b></p> <p>Suggested wording possibly within Point D 'Development must consider circular economy principles extending to local capture and reuse where appropriate (e.g. rainwater)'.</p>	In line with policy LP13, the Council will support the circular economy and contribute towards London's recycling and net self-sufficiency targets by safeguarding existing waste sites and identifying suitable areas for new waste facilities.	No change to the Local Plan required as a result of this representation.
Cyril Richert	Clapham Junction Action Group			1673	Policy LP2	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>14. Achieving Design Excellence LP2 General Development Principles page 211</p> <p>There is a fundamental problem with the listing a series of criteria as in Policy LP2, (which we will find also later with policy LP4). There is a lack of definition of the terms "unacceptable impact", "unacceptable levels", "visual intrusive",</p>	Whilst the importance of protecting the amenity of existing occupiers is recognised, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics. There will not be a 'one size fits all' solution in relation to measuring the impact of development on the amenity of existing occupiers. This should be considered on a site by site basis. The supporting text of the policy clarifies that the Council will have regard to the most recent Building Research Establishment in assessing whether sunlight and daylight conditions are good.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>"would not compromise" ... etc and therefore the decision will only lie on the planner's own consideration, or shall we say... taste.</p> <p>For the purpose of illustration, below are some examples of existing application shows an easy way to circumvent a criterium:</p> <p>- p.a. 2014/5149: While there would be alterations to the surrounding buildings, the impacts are not considered sufficient to justify the refusal of the scheme.</p> <p>- p.a. 2018/3709: The development would result in some loss of daylight and sunlight to some existing windows within nearby residential properties, and in some cases, this would be to a significant degree. On balance, however, it is considered the impact of the development on the amenities of existing neighbours is commensurate with the site's urban location.</p> <p>- p.a. 2018/3709: It is concluded that after careful consideration the proposed development is, on balance, in an acceptable degree of compliance with relevant planning policies and guidance</p> <p>- p.a. 2014/5149: While there would be some harm to the area and listed buildings, on balance, it would be outweighed by the positive benefits of the scheme.</p> <p>- p.a. 2017/5818: In terms of neighbour amenity, there would be some impact to neighbouring properties as a result of the development. However, given the townscape context of substantial buildings within an urban location, the level of impact has been assessed as acceptable.</p> <p>- p.a. 2014/7103: It is clear that there would be a notable impact on neighbouring properties as a result of the development. This would relate to loss of privacy, outlook and overbearance and daylight and sunlight. Whilst borderline, in each of the assessments, it was considered that on balance acceptable.</p> <p>- Etc.</p> <p>We are especially concerned by the lack of precise rules on the impact on adjoining properties. The terms "avoids unacceptable impacts" are a matter of opinion and we doubt that the planner will have the same perception that the resident overlooked by the development.</p> <p>It should be unacceptable to approve proposals with BRE Daylight and Sunlight reports showing that a noticeable number of windows may fail to meet BRE guidelines and experience an alteration in excess of 40% daylight (VSC). Yet Wandsworth Council approves such schemes!</p> <p>Official guidelines recommend a longer distance than the 15m proposed. For example, The London Supplementary Planning Guidance (SPG) (page 83 ) states:</p> <p>"planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21 metres between facing homes."</p> <p>Wandsworth Council should propose a minimum distance of 18-21 metres, in line with the London plan, and allow additional mitigations to prevent overlooking aspects of new build that could diminish the privacy rights of existing properties.</p> <p>Suggested: "Any development should abide the minimum separation distances of 18-21 meters", as per the London Plan.</p>	The application of policies is a Development Management issue rather than a matter for the Local Plan to address.	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						In responses to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we reiterate comments supported by the Wandsworth Society: “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.” 37 . The answer from the Planners that “The degree of overlooking depends on the distance and the horizontal and vertical angles of view. [...] However, public spaces and communal amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide” is inadequate.		
Jeanne Rathbone				36	Policy LP3	<p>I was disappointed at the lack of any section on heritage, particularly information boards/panels. I am especially concerned at the lack of a coherent strategy for heritage and interpretation signage along the riverfront in Battersea from Wandsworth Bridge to Vauxhall Bridge.</p> <p>Given that we are in a pandemic lockdown where the open space of the riverside/Thames path have been crucial for local people and visitors the lack of interesting heritage information has been quite stark as Battersea has a very interesting industrial riverfront heritage which should be promoted attracting locals and visitors alike as a continuation of The Southbank. Such provision should be part of planning application agreements for these riverfront paths and not just for Battersea Power Station which is almost the last vestige of Battersea's industrial past.</p>	Agreed.	Policy PM9, People First, Part E amended to emphasise the need for the interpretation of the historic environment (such as information boards/panels). Where appropriate, development proposals will be required to contribute to meeting this objective.
Kumar Varma				38	Policy LP3	The “Worlds Largest Telescope” built and operated here on Wandsworth Common. The Craig Telescope” It’s about the Rev.James Craig who in 1852 (just after the Great Exhibition opened in Crystal Palace 1851 ) along with his famous colleagues mostly engineers etc built the “largest refractive telescope in the World,” mounted on an enormous 64 foot brick tower. Besides this accolade, the telescope maintained the world record for sheer aperture for 18 years. The astronomical aim and ambition of the Craig Telescope was to research the rings around the planet Saturn. Sadly, at the time the public were not too keen on seeing Saturn instead of the moon. Not many people turned up to look, it was a monster telescope and difficult to focus. The Craig Telescope was in operation for 3 years and dismantled in 1856 leaving only the brick tower in existence until 1871. It is thought that bricks from the Craig Telescope tower were used in the construction of the Surrey Tavern The location of the telescope was in the middle of the large almost triangular dense woodland land across the road from Brinkley's ( Surrey Tavern ) between Trinity Road and Lyford Road. The part of Wandsworth Common between the A24 and B229. This area of the common is now referred to as “The Scope “ Please consider, a garden to commemorate this masterpiece T	There is no scope to allocate a parcel of land to commemorate a specific element of the local heritage within this Local Plan.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			302	Policy LP3	<p>Put back the phrase ‘in addition to requirements of LP2’ from old DMS2.</p> <p>How does this square with the need to radically improve energy use in all existing buildings? In particular there needs to be clear policy in respect of solar panels, heat pumps etc in visible locations in conservation areas.</p> <p>LP3.B <u>Westminster</u> World Heritage Site? Relevance?</p> <p>LP3.H Supported. But this needs a stated resolution for the Council to intervene whenever heritage assets are seen to be neglected, not just when there is a planning application.</p>	<p>It is not necessary to cross-reference other policies that might apply.</p> <p>The revised policy supports the principle of climate change mitigation alterations and adaption responses within the historic built environment when the development is designed accordance with established conservation best practice.</p> <p>In accordance with the London Plan, policies protecting the Outstanding Universal Value of World Heritage Sites (WHS) should be included in the Local Plans of those boroughs where visual impacts from developments could occur.</p> <p>The wording of Part H of the policy is considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			790	Policy LP3	<p>LP3 The Historic Environment</p> <p>We are broadly supportive of the policies which are sensible and thoughtful. However, these will be of value only if implementation follows the spirit as well as the letter of the policies; and if the Council employs sufficient specialist officers to manage the process.</p> <p>A: There is a lack of reference to the useful guidance provided for development in Conservation Areas. We suggest adding final subsection:</p>	<p>It is agreed that the Local Plan should state that consideration should be given to any relevant Conservation Area appraisal.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p>	The supporting text of policy LP3 expanded to state that where appropriate, development proposals will be required to demonstrate that consideration has been given to any relevant Conservation Area appraisal.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>8: in Conservation areas a Design and Access statement should normally be submitted reflecting guidance in the relevant Conservation Area Appraisal and Management Guidance document</p> <p>E: 'substantial public benefit' appears to be too often a value judgement made by planners and the Planning Applications Committee to the benefit of a developer.</p>		
Katie Parsons	Historic Environment Planning Adviser Historic England			871	Policy LP3	<p><b>Policy LP3: Historic Environment</b></p> <ul style="list-style-type: none"> <li>We welcome this strong, well written policy. We do recommend some minor changes however to ensure soundness:</li> <li><b>Part D</b> – it would be helpful to expand this further to require applications for demolition to be accompanied by a legal agreement, or condition, which ensures the building is not demolished until a replacement development is ready to be implemented. This is to avoid the creation of gaps and empty plots within conservation areas, to the detriment of their character and appearance.</li> <li><b>Part E</b> – we generally advise against duplicating the NPPF, in line with NPPF 16.f. In any case this part of the policy does not accurately reflect the NPPF 194 tests. Substantial harm to assets of the highest grade should be <i>wholly exceptional</i>, and to lesser graded assets, <i>exceptional</i>. The term "resisted" is a weaker application. <i>Any</i> harm should require clear and convincing justification. Equally, great weight should be attached to the conservation of the historic environment regardless of the degree of harm.</li> </ul> <p>We are particularly pleased to see appropriate reference to Heritage at Risk, non-designated heritage, shopfronts, and the recognition that heritage is an irreplaceable resource.</p>	Agreed.	<p>Part F (now E) of policy LP3 revised to align the wording with paragraph 194 of the NPPF.</p> <p>The supporting text of policy LP3 expanded to state that applications for demolition will need to be accompanied by a legal agreement which ensures the building is not demolished until a replacement development is ready to be implemented.</p>
Julie McPhillips				976	Policy LP3	<p>You speak of saving the Old Imperial Laundry in Warriner gardens however you have already knocked over half of it away and again have allowed the most disgusting out of place buildings to be built on an otherwise beautiful street filled with Victorian architecture. My worry is the land you sell off to private construction companies will be used to build towers etc without any thought of the buildings already in existence. I am concerned that our borough will become a crowded ugly mess and you should really think about how to move forward with this rather than just selling pockets of land to the highest bidder.</p> <p>As the endless buildings are going up in Wandsworth, we are losing our unique skyline and also losing light and an open view of the sky. Nine Elms and the recent build on Plough lane are a case in point.</p>	The application of policies is a Development Management issue rather than a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.
Hassan Ahmed Hassan Ahmed	GLA			1114	Policy LP3	<p><b>Heritage</b></p> <p>The Mayor welcomes the borough taking a plan led approach to future growth based on a clear understanding of local character which is in line with the approach to good growth that underpins the PLP.</p> <p>Draft Plan Policy LP3 is welcomed for its intention to protect the significance of the OUV of the Westminster WHS including setting and views which, as stated earlier, lies in close proximity to the LB Wandsworth. The link to the London View Management Framework (LVMF) and promotion of the use of 3D digital analysis to assess potential development impact as set out in paragraph 14.34 is also welcomed.</p> <p>However, PLP Policy HC2 is clear that neighbouring Boroughs to Local Authorities with World Heritage Sites should include policies in their Development Plans that conserve, promote, actively protect and interpret the OUV of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management. Paragraph 7.2.4 is clear that Wandsworth's Local Plan should contain such policies for the Westminster</p>	<p>It is agreed that there is scope to provide a greater level of detail in relation to protecting the OUV of Westminster WHS. It is however considered that this can be done by expanding policy LP3 rather than by the inclusion of a separate policy. There is also an opportunity to make an appropriate reference to Westminster WHS in policy LP4.</p> <p>Wandsworth Council forms part of the Westminster World Heritage Site Steering Group. The representatives of the Council contributed to developing the Westminster World Heritage Site Management Plan. The Council also worked proactively with Westminster Council to identify potential cross boundary visual impacts that may arise.</p>	<p>New Part B added to Policy LP3.</p> <p>New criterion added to policy LP4.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>WHS and should provide a greater level of detail in relation to protecting the OUV of Westminster WHS.</p> <p>Wandsworth may wish to consider the inclusion of a separate policy focused on this issue as well as including relevant detail within the draft Plan Policies LP3 The Historic Environment and LP4 Tall Buildings. The PLP Policy requires that up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan. It would be useful to understand if the borough has been in communication with Palace of Westminster WHS as part of the plan-making process. Boroughs should work collaboratively when plan-making to identify potential cross boundary visual impacts that may arise and how this issue will be managed over time.</p> <p>As set out in paragraph 7.2.6 of PLP Policy HC2 it is expected that neighbouring boroughs will be part of the World Heritage Site Steering Groups that contribute to the management of the sites, including the drafting and adoption of Management Plans and the draft Plan should make reference to this as well as the existing statement in paragraph 14.34 which notes that Wandsworth is a stakeholder borough along with adjacent boroughs to protect and manage the OUV of the Westminster WHS including its setting.</p>		
H Monger	Director London Historic Parks and Gardens Trust			1245	Policy LP3	<p>Areas of concern</p> <p>We object to the mismatch between Policy LP3 and the supporting paragraphs. The Emphasis in the policy is on buildings rather than landscapes. The Policy wording should be clarified.</p>	The wording of the policy is considered appropriate.	No change to the Local Plan required as a result of this representation.
DTZ Investment Management Limited	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP	1255	Policy LP3	<p><b>See attachment on comment 1250 for the full representation for context and images.</b></p> <p>EMERGING POLICY LP3: THE HISTORIC ENVIRONMENT</p> <p>The suggested amended wording for Part B (1) of emerging Policy LP4 outlined earlier in these representations relies upon an assessment of the effects of tall buildings on heritage assets under emerging Policy LP3 (The Historic Environment). This policy does not currently make reference to less than substantial harm in line with the National Planning Policy Framework.</p> <p>Part E of emerging Policy LP3 currently refers to substantial harm but we would suggest that this is re-worded to state:</p> <p>"Development proposals involving <del>harm to substantial harm to (or total loss of significance of)</del> designated heritage assets <del>(including through development in their setting)</del> will be resisted unless it can be demonstrated that the substantial harm or total loss is necessary to achieve <del>substantial</del> public benefits that outweigh that harm or loss and has been clearly and convincingly demonstrated in accordance with national policy and guidance."</p>	The wording of the policy is considered appropriate.	No change to the Local Plan required as a result of this representation.
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1301	Policy LP3	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP3 - The Historic Environment</b></p> <p>Ballymore supports the policy direction of protecting the historic environment and buildings where</p> <p>there are clear benefits associated with protection. However, we have concerns that the proposed</p>	Agreed.	Part F of policy LP3 revised to clarify that it applies to buildings that make a positive contribution to the character of the area

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>policy is overly restrictive especially in relation heritage assets that do not contribute to the wider area.</p> <p>The proposed approach does not give weight to the fact many buildings within conservation areas can detract from the historic significance and the consequent benefit associated with their removal.</p> <p>We therefore request that the following amendments are made to the policy to remove the hurdles associated with the demolition of buildings which do not contribute to the historic environment</p> <p style="text-align: center;">1. The substantial or total demolition of buildings in conservation areas that make a positive contribution to the character of the area will be resisted unless it can be demonstrated that the tests set out in Part E below have been fully complied with.</p> <p>The above approach will bring benefits to the wider historic environment encouraging the removal of inappropriate buildings and providing the Council and developers with the opportunity to provide benefits through their replacement.</p>		
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1393	Policy LP3	<p><b>LP3 The Historic Environment</b></p> <p><b>Pg 215 A.1</b> <i>The conservation of features and elements that contribute to the heritage asset's significance and character. These may include <b>chimneys, windows and doors, boundary treatments, original roof coverings, shopfronts or elements of shopfronts in conservation areas.</b> SGCARA supports these statements. <b>However they must be enforced in practice.</b> There are examples below of where conservation of the features marked in <b>BOLD</b> above has not been enforced by the WBC Planning Dept, despite representations by SGCARA.</i></p> <p><b>Chimneys:</b> The PP granted for the construction of what became 2a Combmartin Rd SW18 included a (cosmetic) chimney to soften the harshness of this 'modern' building &amp; to resonate with those of our SGCARA 1920s/30s houses. This builders did not include this chimney at all, as per PP, &amp; crucially it was not included as a Condition in the Retrospective PP finally granted, despite SGCARA's submission that a chimney would have been an important resonance with adjacent buildings.</p> <p><b>Windows:</b> At present, the Planning Dept does not appear to make no insistence on the maintenance of original window-patterns, when replacement windows are installed in our CA. This means that there are examples of large single panes, where the original frame would have included two – including a small top frame. This is highly degrading to the integrity of the CA. Distinctive curved detail on window-frames,(eg in Combemartin Rd houses), is also often</p>	The application of policies is a Development Management issue rather than a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>lost when windows are replaced, as the Planning Dept does not insist on it. This is contrary to LP3 A.1</p> <p><b>(Front) Doors:</b> The puzzling advice has recently been given to SGCARA by the Planning Dept that <b>front doors</b> (distinctive to each street of 1920s/30s houses in our CA) appear to be able to be changed at will by residents to designs completely incompatible. This appears contrary to LP3 A.1. above, &amp; contributes to the degrading of the special qualities of our CA houses.</p> <p><b>Boundary Treatment:</b> Despite the protection that should be afforded to preserving existing boundary-treatments, the Planning Dept appears to adopt a free &amp; easy approach to householders removing large portions of their front boundaries for off-street parking, creating a dispiriting concrete desert, at odds with our Conservation Area Appraisal. Householders are also often given PP to remove environmental front-<b>boundary treatments</b> (eg hedges) &amp; replace them with walls, despite SGCARA invoking the stated presumption that current boundary treatments should remain. (An example is 41 Sutherland Grove). SGCARA has also recently been told by the Planning Dept that they cannot effect (removal) Enforcement against a householder (29 Skeena Hill) who has both rendered a brick wall – itself part of a continuous &amp; distinctive supporting wall - &amp; then painted it incongruous grey. The Planner concerned admitted that it looked awful. This appears to be a negation of the responsibilities outlined in LP3 A.1.</p> <p><i>A.2 The reinstatement of features and elements that contribute to the significance of the heritage asset which have been lost.</i> SGCARA again strongly supports this statement but once again expects that the Planning Dept should insist on significant details. An example is the distinctive brick 'quoins' found on the wall-edges of a number of our CA houses. When extensions are built, householders sometimes paint over these in ignorance, so their impact is largely lost. The Planning Dept does not appear to insist that they remain unpainted or to insist that paint is removed when it has been applied.</p> <p><i>A. 3 The conservation and, where appropriate, the enhancement of the space in between and around buildings including front, side and rear gardens.</i> This is a laudable aim, which SGCARA entirely supports, but which is often ignored by the Planning Dept. LP3 A.3 needs to be <b>enacted</b>. The view between our 1920s/30s houses to the green trees beyond is a noted feature of our Conservation Area Appraisal. However, when (usually new) residents include intrusive &amp; bulky side-extensions in their Planning Applications, these are too often granted PP, despite Objections from SGCARA &amp; often from neighbours, pointing out the significance of these spaces between the houses. Elsewhere in the Borough, LP A.3 has been ignored. The Battersea Power Station development is an example. The surrounding buildings are so tightly packed in that the Power Station itself is scarcely visible, apart from the river.</p> <p><i>4. The removal of additions or modifications that are considered harmful to the significance of any heritage asset. This may include the removal of pebbledash, paint from brickwork, non-original style windows, doors, satellite dishes or other equipment.</i></p>		
Cyril Richert	Clapham Junction Action Group			1674	Policy LP3	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>LP3 General Development Principles page 213</p> <p>We support the principal. However, Wandsworth Council should demonstrate within the policy how it intends to enforce the listed elements.</p> <p>Former Fishmonger/Alchemist façade (p.a. 2015/2762) which was demolished against planning permission, was never rebuilt "brick by brick" as the then Planning chairman Cllr Sarah McDermott declared, but a retrospective application was granted to rebuild with modern masonry blocks. As pastiche goes...</p>	<p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>Part F of the policy is required to ensure compliance with national policy and guidance.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>In addition, we oppose Part Out: Council's decision are currently full of the wording "benefits outweigh harm" which is a private consideration.</p> <p>Should be removed: Development proposals involving substantial harm to (or total loss of significance of) designated heritage assets 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</p>		
Cyril Richert	Clapham Junction Action Group			1682	Policy LP3	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>Conservation Area?</p> <p>There is no section explaining how the Council intends to preserve and enhance the conservations areas.</p> <p>See also our previous comment on Site Allocations / CJ1 ASDA, LIDL and Boots sites, Falcon Lane, SW11.</p> <p>In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we commented that "conservation areas should be mentioned at least." Response was that The Wandsworth Policies Map will be available online and in print (??)55 . We note its absence.</p> <p>In addition, we wanted the definition of conservation areas to be strengthened. We do not accept the response from the Planners that "changes to conservation areas can be made outside of a Local Plan process" and therefore that it can be totally absent. 56</p> <p>A section should be added. LP3 is not considered appropriate to justify the absence of section on conservation area.</p>	Conservation areas are classified as designated heritage assets. The policy sets out an approach to sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of heritage assets.	No change to the Local Plan required as a result of this representation.
Emma Broadbent	London Rivers Officer South East Rivers Trust			264	Policy LP4	<p>Many of the Site Allocations are riverside developments within areas that have been identified as appropriate for tall buildings. <b>Policy LP4</b> references the impact that these building may have on microclimate and lighting with respect to surrounding vistas and shading of public spaces. However, this Plan does not recognise the impact of overshadowing on river corridors and we would welcome a requirement for all riverside development to undertake a day light, sunlight and overshadowing assessment. Riverside development proposals should be restricted in height or designed in such a way so as not to impose additional permanent shade to the river.</p>	The impact of development proposals on the levels of daylight and sunlight will be assessed in line with policy LP2. This is not repeated in policy LP4. However, proposals for tall building near the River Thames will also be required to comply with the London Plan policy D9, which includes a criterion requiring proposals to protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			303	Policy LP4	<p>Better than before, but worthless unless applied. Almost every major scheme approved under the current local plan has doubled the suggested heights. Offsetting public benefits must be real and genuinely substantial.</p> <p>LP4.B.3, 4 &amp; 8. 'Landmark' should not include private developments. This word has been devalued. Town centres don't need 'landmark' or 'gateway' buildings unless they are truly public.</p> <p>LP4.B.12 The Thames Path is too often overshadowed. Wandsworth's riverside generally faces north.</p> <p>LP4.B.20. Is this established rights of way? If so it is obligatory to keep them. New ways through are rarely possible onto the back of adjacent sites.</p> <p>LP4.E Proposals must be guided, 'should' is weak.</p>	<p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The reference to 'landmark buildings' was removed as a result of other amendments to the policy.</p> <p>Proposals for tall building near the River Thames will also be required to comply with the London Plan policy D9, which includes a criterion requiring proposals to protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.</p> <p>The criterion regarding maintaining through access includes but is not limited to established rights of way.</p> <p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. This results in a stronger and more plan-led policy approach.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Linda Hudgins				441	Policy LP4	<p>Good morning,</p> <p>I should like to strongly object to the Draft local plan which is to suggest the building of high rise buildings at the end of Putney Bridge Road. These building should only be permitted up to Brewhouse Lane on the North side and up to the existing hotel on Burstock Road on the south side.</p> <p>We currently reside in a very pleasant, residential area which has been used massively during the pandemic for folk to exercise and to walk through to Wandsworth Park. It is also a conservation area. The high rise proposals would damage the area through loss of light and would be an overbearing development, overshadowing particularly the Almshouses on Putney Bridge Road.</p> <p>We also have massive problems with parking in the area which will be additionally adversely affected by the approved development on the north side of Putney Bridge Road. Some how this development received approval even with insufficient parking spaces for the hotel planned for the site.</p> <p>Why do we need more high rise? Offices? Shops? As we are aware more offices are not required as there is already a surplus of unrented properties in the area. Retail is becoming a redundant pursuit too. Removing the existing little, family run businesses is a retrograde step. It is interesting to note that these small businesses are surviving where larger rented businesses are not ( Laura Ashley, Trinity Hospice )</p> <p>We hope the final decision which is to be taken in 2022 will take the above matters into account.</p> <p>I wholeheartedly object to the proposals</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p>	No change to the Local Plan required as a result of this representation.
Mary Buckley				484	Policy LP4	<p>Dear Sir,</p> <p>We would like to comment on the Wandsworth Local Plan which sets out the vision for future development in the Borough.</p> <p>Having lived in Southfields for many years we are concerned that under the Tall Buildings policy, part of Southfields centre has been designated as being suitable for tall buildings within a local context, which is specified as five stories high. We would ask for there to be no increase in the permitted height of buildings. Southfields is often described as a village and it has largely retained it's character, but recent permissions have been given to developments particularly along Wimbledon Park Road which are out of keeping with regard to architectural design and materials used. Whilst Southfields should develop as a centre for commercial activity, this should no developments should be permitted which will alter the density and character of the area.</p> <p>Kind regards,</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. No mid-rise or tall building zones are proposed in the Southfields local centre.</p>	No change to the Local Plan required as a result of this representation.
A C McCarthy	Pimlico Forum			511	Policy LP4	<p>Wandsworth Planners</p> <p>This is sent in haste because of time limits from your neighbours over the river by Pimlico Neighbourhood Forum. We are concerned that you persist in being bad neighbours in paying scant or no notice to the effect of your plans on residents and businesses north of the river in Pimlico.</p>	<p>Comment noted. The bridge will have to secure planning permission with a site-specific design aimed at addressing any issues at the northern and southern landing sites.</p>	No change to the Local Plan required as a result of this representation.
Mr Richard Norton				622	Policy LP4	<p>Dear Sir/Madam,</p> <p>I am writing on behalf of the Deodar-Merivale-Florian Roads Residents Association to express our strong objection to the proposal, in the Pre-Publication version of the Draft Local Plan, to permit high rise buildings to be built at the western end of Putney Bridge Road (PBR). We believe that high rise buildings should be permitted no further east along Putney Bridge Road from</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Putney High Street than Brewhouse Lane on the north side and the existing hotel on the corner of PBR and Burstock Road on the south side.</p> <p>Permitting high rise buildings to encroach further east along PBR than this would seriously damage the pleasant residential character of the neighbourhood on both sides of PBR. In addition:</p> <p>&gt; The 2–3 storey residential buildings to the north of PBR at the western end of Deodar Road would suffer unacceptable loss of light and particularly direct sunlight in autumn, winter and spring.</p> <p>&gt; The single storey historic almshouses on the southern side of PBR between Burstock and Atney Roads would be seriously overshadowed.</p> <p>&gt; The preservation of the historic character of the neighbouring conservation areas would be adversely affected.</p> <p>&gt; Further over development of this stretch of PBR would aggravate the existing traffic congestion at the junction of PBR and the High Street, where traffic frequently backs up to the east beyond Oxford Road in the morning rush hour.</p> <p>We appreciate that this is still only a draft document but we are anxious that this, we hope, mistake is rectified as soon as possible and that no high rise development will be proposed or permitted further east along PBR than Brewhouse Lane on the north side and the hotel on the corner of PBR and Burstock Road on the south side in the final Draft Local Plan scheduled to be published in Spring 2022.</p> <p>Kind regards</p> <p>Richard Norton</p>		
Monica Tross	Sectary to planning committee  Battersea Society			791	Policy LP4	<p>LP4 Tall Buildings</p> <p>Overall these appear to be aiming to micro-manage applications and at worst will provide a tick list for developers and their planning consultants to check off.</p> <p>Many area strategies include mention of tall being 5 or 8 storeys but ignore the fact that many 20+ buildings have already been approved.</p> <p>Point 5. We applaud the requirement that proposals should be supported with graphic 3D modelling although this should show the bulk of the proposed new building, not just a red outline with the existing background showing within the outline.</p> <p>Point 7. The requirement that buildings should respect and not overwhelm the proportions of the local environment is admirable but regularly ignored by developers and, in practice, the Council both in granting permission and in its own proposals (Crewkerne Garages a case in point).</p> <p>Point 9. The policies seem to accept that tall buildings may be located near the street edge. We urge that they should, wherever possible, be set back from the pavement.</p> <p>Point 16. We support the requirement for shade analysis, but the effect of shade on planting should always be included.</p> <p>Point 19. The suggestion that non-residential use of the ground floor should include public spaces is admirable, but it is too seldom provided in practice.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. This results in a stronger and more plan-led policy approach.</p> <p>The heights referenced in the previous version of Site Allocations were local definitions of "tall" rather than height limits.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The acceptability of tall buildings located close to the street edge will be determined in accordance with the policy. Criterion number 8 provides specific design guidance for such proposals.</p> <p>Development proposals will be required to comply with policy D6 of the London Plan, which includes the following requirement: 'The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space'.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Too often the PAC and the planners find the justification given for a tall building to be 'convincing'. Adverse effects should be avoided, not mitigated.</p> <p>It appears to us that developers routinely pay a price for land which assumes the Council will find their need for height and density to provide viability persuasive. Thus there is a vicious circle of over-priced land and over-tall and dense buildings.</p>		
Sue Mobed				640	Policy LP4	<p>As a resident of Deodar Road, I would like to object to the council's proposal to permit tall buildings along Putney Bridge Road and affecting Deodar Road. This is at odds with the Council's Conservation Area plans and, at a time when the world is focussed on environmental issues, adding to the density of buildings in this area seems a really bad prospect. The Putney Bridge Road already suffers from severe traffic problems.</p> <p>A tall building has already been authorized on the other side of the Putney Bridge Road which was objected to by many for the pressures it will bring on the local area, including pressure on infrastructure and overloading of facilities. The proliferation of high density buildings in this area has put pressure on everything from junctions (pedestrian also), parking spaces, traffic (cars, cycles and pedestrian), noise pollution and areas of leisure such as Wandsworth Park. Putney has been given very little money by the government to improve infrastructure and so focus should surely be on appropriacy – on how to meet local needs without adding to local pressures.</p> <p>This area is known and appreciated as a pedestrian through-fare. Throughout lockdown Deodar Road has been packed with people and cyclists. Adding more buildings will add to the cars using these roads as a cut through as well as adding to the general traffic volume of all types of vehicle. Even if car access is restricted, motorbikes, cars and scooters will proliferate if tall buildings are permitted to add higher density of population in the area.</p> <p>The Council has a duty under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to formulate and publish proposals for the preservation and enhancement of conservation areas. Surrounding the conservation areas such as Oxford Road and Deodar Road with high rise, high density buildings is contrary to preserving and enhancing these areas.</p> <p>As such, I object.</p> <p>Thank you for considering the above,</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.
Frank Burgess				839	Policy LP4	<p>Why does Wandsworth council carry on these travesties of engagement? We've had several consultations in recent times. The result has always been the same: we don't want high rise blocks and indiscriminate over development. Not only have these findings been completely ignored but what has subsequently followed has actually been the opposite of what we clearly stated we want. Wandsworth council doesn't solve problems, it IS the problem.</p>	<p>Comment noted. The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p>	No change to the Local Plan required as a result of this representation.
Katie Parsons	<p>Historic Environment Planning Adviser</p> <p>Historic England</p>			872	Policy LP4	<p><b>Policy LP4: Tall Buildings</b></p> <ul style="list-style-type: none"> <li>• <b>Part A</b> - We welcome the clear local definitions for tall buildings.</li> <li>• <b>Part B.3 and 4, and 14.48</b>- The policy provides support for landmark buildings but provides very little guidance as to where they should go or how a building will be judged a landmark, not does it provide a distinction between a landmark tall building and a normal tall building. Leaving the decision as to where landmarks ought to go up to applicants could result in uncontrolled landmark buildings coming forward. As such a situation may arise where every application for a tall building is submitted on the basis that it is a landmark. Landmarks are a strategic issue and not every building can be landmark. Landmarks need to be planned to avoid undermining the point and creating illegibility. It is therefore reasonable to expect the Council to provide strategic guidance on this within the local plan. Ideally the plan would indicate where existing landmarks are and use this to help plan where additional landmarks could be located.</li> </ul>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. This results in a stronger and more plan-led policy approach, while reducing the amount of areas that are appropriate for tall buildings.</p> <p>The reference to 'landmark buildings' was removed as a result of other amendments to the policy.</p> <p>The height of consented buildings and the location of existing tall buildings which are considered inappropriate (including landmarks) have not been considered as a sufficient justification for the creation of further tall building zones. Therefore, the Plan seeks to prevent further exacerbation of harm caused by existing inappropriate tall buildings. Enhancements to existing landmark buildings that have negative impacts will be supported; however, it is considered that there is no need to articulate that in the wording of the policy.</p>	<p>Criterion B.10 of policy LP4 amended.</p> <p>UDS amended as per the response.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>The provision of a definition for landmark buildings would be helpful. Landmark buildings are those simply distinct from their surroundings, they do not equate to tall. This does not come across in the plan.</li> <li>The evidence identifies existing landmark buildings that have negative impacts as a result of their massing, monotonous nature, and lack of local distinctiveness. The plan could positively seek to address this harm by placing an emphasis on the enhancement of these developments should subsequent proposals come forward.</li> <li><b>Part B.10</b> - talks about striking a balance between optimising views of the river (when considering riverside tall buildings) and protecting views/spaces behind. Views of the river from within tall buildings is not a planning consideration or a public benefit, it is a private benefit. It is not clear then why a balance ought to be struck and public benefits potentially compromised. Nor is there any evidence to show that internal views of the river from within new development should be a priority that warrants a positive policy response.</li> <li><b>47</b> - We welcome reference to Historic England's Advice Notes on tall buildings.</li> </ul> <p><b>Tall Building Locations:</b></p> <ul style="list-style-type: none"> <li><b>Riverside</b> - We are concerned with the extent of the boundaries considered appropriate for tall buildings. Especially as the plan focuses the tallest buildings along the riverside. Much of the riverside has already been developed by tall buildings and intensifying this could overwhelm the riverside and create a canyon like effect.</li> <li><b>Battersea Park RPAG</b> - all three sides of Battersea Park would be surrounded by tall buildings. The Urban Design Study states that the Park is <i>valued for its cultural and historic character, sense of openness and as a backdrop to views across the river. Also valued for its relative sense of tranquillity</i><sup>[1]</sup>. It also tells us that <i>the high value and high susceptibility of the area mean that any significant change is unlikely to be appropriate</i><sup>[2]</sup>. It goes on to state that a strategy to conserve the area is most appropriate. The Study makes a specific design recommendation which is to preserve the openness of the park and the riverside by resisting development which would affect this perception. The plan, which identifies areas in the immediate vicinity as being appropriate for tall buildings, does not align with the evidence.</li> <li>It does not appear as though the setting of either the Thames or the Park have been taken into consideration when determining suitable locations for tall buildings. There is likely to be scope for development that meets the definition of a tall building to be constructed here, but the plan should provide maximum parameters to prevent uncontrolled skylines, and the formation of a canyon like wall of development.</li> <li>The areas identified as appropriate for tall buildings should be further refined. It is unlikely that everywhere within the area boundaries could accommodate tall buildings. This will also in part deal with the issue of appropriate areas being immediately adjacent to inappropriate areas. Alternatively, a greater amount of detail should be included to guide development as to how border sites should be treated i.e. technically tall but still comparatively low allowing development to step up into less sensitive areas.</li> <li>The Urban Design Study does not consider the impact of tall buildings in area G1 upon Fulham palace. It is important that buildings do not loom above the tree line that surround the palace grounds on the north back of the river.</li> <li>The Appendix 2 maps are lifted out of the Urban Design Study, but this removes them from their context. The Study uses</li> </ul>	<p>It is agreed that views of the river from within tall buildings is not a planning consideration or a public benefit, it is a private benefit.</p> <p>Tall building zones have been refined, with specific regard to important views and character of the area to establish appropriate heights. It is understood that the sense of openness is important to the character of the park and needs to be retained. It is noted that there are existing tall buildings in the vicinity of Battersea Park, some of which exist already within the setting of the RP&amp;G without adverse effect or appreciation from within the park. The southern frontage is set against period mansion blocks (5 storeys) within the conservation area and which are not in the tall buildings zone. The area identified as a tall building zone is south of Battersea Park Road. The visual impact of tall buildings in any zones in the vicinity of Battersea Park has been carefully assessed in the Urban Design Study. The results of the assessment informed the identification of appropriate heights for tall building zones.</p> <p>Potential impacts on Fulham Palace were considered as part of the UDS; however, it is recognised that this could be evidenced better in the report. The main character of the Conservation Area is the setting of Fulham Palace and its grounds in open landscape. It is important that view out of the grounds retain this sense of open landscape character. This should be reflected in the Urban Design Study.</p> <p>Taking into account that the revised policy identifies clear tall building zones and appropriate height ranges for each zone it is considered appropriate to include the maps in an appendix to the policy.</p> <p>The value of River Thames is reflected in the identified tall building zones and appropriate height ranges.</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>these as broad areas of search but then drills down to look at specific sites. It does not ultimately say the entire areas are appropriate.</p> <ul style="list-style-type: none"> <li>• Some of the massing in the Urban Design Study suggests spaced out, incoherent patterns of tall buildings which is unhelpful in townscape terms e.g. the riverside cluster.</li> <li>• The plan identifies large swathes of the riverside land as being suitable for the tallest buildings within the borough. There are existing tall buildings in this location and there may be scope for additional buildings of a substantial size but the present of existing tall buildings in not adequate to justify more. Especially as the plan potentially allows unlimited heights and does not consider the harm that these existing building have caused. London Plan policy D9.C.1.F makes it clear that tall buildings should protect the open quality of the river, including views and avoiding a canyon like effect. The plan promotes the riverside as a destination for tall buildings which may conflict with the London Plan.</li> </ul> <p><a href="#">[1]</a> Page 78 Urban Design Study 2020</p> <p><a href="#">[2]</a> Page 79 Urban Design Study 2020</p>		
Suzanne Eske				673	Policy LP4	<p>Dear Sirs</p> <p>I have to say I am horrified at the proposals for building up the western end of Putney Bridge Road.</p> <p>We already have very high pollution on the High Street due to the narrow street with high buildings and volume of traffic, and this scheme appears to increase the problem on the junction and extend it along Putney Bridge Road.</p> <p>My personal view is that it doesn't sit well with the existing style and fit of the area, especially the single storey alms houses, nor is it particularly desirable. Do we really need more tall buildings when half of our high street is empty, and desperately needs attention/investment. I have lived in Deodar Road for over 20 years now and have always questioned the rationale of the High Street. It has to be that the rents are so high only chain stores and brands can afford them. A scheme there that offers a mix of residential and affordable retail could regenerate this main road, and allow Putney residents space where they can still see the sky!</p> <p>Suzanne Eske</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Toby Gawin				857	Policy LP4	<p>Sir,</p> <p>I , as a long term resident of Wandsworth on Deodar Road, I register my strong objection to the proposed plans for tall buildings along PBR up to the existing Dynamo site.</p> <p>In my view the proposal will have a hugely detrimental effect on the area. The existing traffic fumes already make the High Street one of the most polluted in the UK, and this proposal will both extend this and make the air much worse.</p> <p>This in addition to additional parking congestion, pedestrian access and safety and loss of light. Surely this is a residential low rise area and should be protected?</p> <p>Yours Sincerely,</p> <p>Toby Gawin</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Andrew and Anya	LB Wandsworth			892	Policy LP4	<p>We are writing with respect to the 'Pre-Publication' Draft Local Plan as it relates to Putney. We would like to express a strong objection to the proposal under</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Vickers						<p>the Tall Buildings policy that would permit tall buildings to be built along Putney Bridge Road from Putney High Street to Deodar Road, including the Dynamo building and the around the corner to the site of 1 Deodar Road.</p> <p>We believe that any buildings that would be higher than the existing buildings east of Brewhouse Lane would severely adversely impact the local area through the following: loss of light, loss of privacy and overshadowing of houses and gardens, such tall buildings not being in-keeping with the character of the area that is inherently low-rise terraced residential housing with conservation areas and historic buildings such as the alms houses, increased congestion in an already very congested area (Putney Bridge Road being very busy during most parts of the day) and a massive strain being placed on parking that is already very limited.</p> <p>We would therefore strongly request that the scope of the Tall Building policy be reconsidered to extend no further east than Brewhouse Lane and be confined to the PUT2 &amp; PUT3 sites that are referenced in the Local Plan.</p>	2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	
Julie McPhillips				974	Policy LP4	I feel there is far to many suggestions to build tall buildings and towers in the borough. The new nurses accommodation next to Springfield hospital and golf course was completed just a couple of years ago and it has been marked as a potential tall building. I would completely object to that happening. I feel the buildings all along Nine Elms are an eyesore and the group of new towers built around Vauxhall to be completely out of place for the area and look a total ugly mess. This may not be in Wandsworth but I think they should be viewed as an example of what not to do.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. This results in a stronger and more plan-led policy approach, while reducing the amount of areas that are appropriate for tall buildings.	No change to the Local Plan required as a result of this representation.
Hassan Ahmed	GLA			1112	Policy LP4	<p><b>Tall Buildings</b></p> <p>The Mayor welcomes that consistent with the requirements of the PLP Policy D9 the draft Local Plan Policy LP4 (together with Appendix 2) defines what is considered a 'tall building' for specific localities, identifies appropriate in principle locations as suitable for tall building development and maps such locations within the draft Local Plan in Map 14.1 Appendix 2</p> <p>(figures 2-10).</p> <p>It is welcomed that the borough's approach to tall buildings is based on an understanding of local character and underpinned by an evidence base to this effect, having been identified through the Urban Design Study (including a characterisation study) produced in 2020. It is noted that this Study was tasked with taking into account the factors set out in PLP Policy D1.</p> <p>The PLP Policy D9 part B 3) sets out that tall buildings should only be developed in locations that are identified as suitable in Development Plans. This should be clarified and reflected in the draft Plan.</p> <p>It is noted that heights for the identified locations have also been identified (Appendix 2 Table 23.1), however it is not clear whether the heights specified for different areas are intended to represent the appropriate heights for those areas or simply the minimum threshold for what will constitute a 'tall building' with additional height still considered appropriate? This should be clarified, and Wandsworth should ensure that appropriate tall building heights are identified on maps within the Development Plan documents.</p> <p>In December 2020, the Secretary of State (SoS) made a Direction for PLP Policy D9 which defines the minimum height for a tall building including for any local borough definition as not less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. It is appreciated that the Wandsworth Local Plan Regulation 18 version may have been drafted prior to this amendment. However, any definitions for 'tall buildings' that are less than 6 storeys would now likely be an issue of non-conformity and the draft Local Plan should be revised accordingly. The borough should have</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p> <p>It is agreed that there is an opportunity to make a reference to Westminster WHS in policy LP4.</p>	<p>Revise policy LP4 as per the requirements set out in London Plan policy D9.</p> <p>Add reference to Westminster WHS in policy LP4.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>regards to paragraph 3.9.3 of the PLP which states that in those areas where there is no local definition, the policy applies to buildings over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. There is a reference made to Historic England's Tall Building Advice Note 2015 in paragraph 14.47 of the draft Plan. Historic England is in the process of updating this Advice Note, a draft of which was consulted on in early 2020. Dependent on when the updated Advice Note is published, the reference to it in Policy LP 4 (and paragraph 14.47) may require an update. The borough neighbours another which includes a World Heritage Site (WHS) within its boundary, namely London Borough of Westminster and the Westminster WHS. Given the potential for tall building development to have an impact on the setting of this WHS PLP Policy D9 part C 1 is clear that buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value (OUV) of the World Heritage Site, and the ability to appreciate it. Wandsworth may wish to consider including detail within policy LP4 outlining their approach to this issue and clarifying if any work has been undertaken with the London Borough of Westminster on how potential cross boundary issues are to be addressed and managed.</p>		
Kin Development		Ben Ford	Director Quod	1041	Policy LP4	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Chapter 14 Achieving Design Excellence</b></p> <p><b>LP4 Tall Buildings / Map 14.1 Tall Buildings – COMMENT</b></p> <p>Kin support the allocation of the Gasworks site as an Opportunity for tall buildings within town centres</p> <p>and along strategic routes.</p> <p>It is unclear however why the plan differentiates between 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes'. The 2020 Urban Design study does not and there is no reasoned justification in the Reg 18 Plan. This requires clarification. It is also unclear what the term 'landmark' buildings refers to. It may be more appropriate to create a single definition.</p> <p>1. <u>Proposals for tall buildings should be guided by the height identified in the Council's Urban Design Study.</u></p> <p>We propose the removal of this part of the policy as it is ambiguous and inflexible and has not been subject to viability testing.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p> <p>The reference to 'landmark buildings' was removed as a result of other amendments to the policy.</p> <p>The revised version of the policy does not differentiate between 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes'. This is now embedded in the identified appropriate height ranges for each zone.</p> <p>Note that the typologies contained in the Whole Plan Viability Assessment have been informed by policy LP4. The Whole Plan Viability Assessment indicated that the Local Plan is viable.</p>	No change to the Local Plan required as a result of this representation.
VSM Estates	VSM Estates	Freya Turtle	Associate Director	1061	Policy LP4	<b>For full context, see the attachment with comment 1058</b>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
			Turley Associates			<p>Policy - LP4 Tall Buildings</p> <p>London Plan conformity - Policy LP4 is informed by Appendix 2, which sets out a number of local definitions for 'tall', which is based on the assumption that a tall building is one that is eight storeys or more; or 50% higher than the prevailing context (and in areas where the prevailing context is five storeys or more, any building that is eight storeys or more will be defined as a tall building). In other words, any building above eight storeys will always be defined as a tall building, regardless of context.</p> <p>This is not considered to be in accordance with the London Plan Policy D9. First, London Plan Policy D9 states that the minimum height for a tall building must be at least six storeys. This is contrary to Policy LP4 and its suggestion that a five storey building can be a tall building, where the surrounding context is two to three-storeys (indeed in Appendix 2 to the Local Plan, where the tall building definition is given for all areas in the borough, the vast majority of these areas have a tall building definition of five storeys).</p> <p>Second, the supporting text to London Plan (paragraph 3.9.3) states that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. The blanket approach to any building above eight storeys being a tall building regardless of context is not consistent with the London Plan. In particular, Appendix 2 and its area analysis consider that a tall building at the Apex Site and Thessaly Road Site would be five storeys and above; and at the Entrance Site a tall building would be eight storeys and above. This has no regard to the emerging context of this Opportunity Area and the fact that there are buildings permitted / under construction for heights of 20, 30, 40 and 50 plus storeys. To suggest a five or eight storey building is tall in this context is fundamentally flawed, especially as the Nine Elms area is identified in the relevant evidence based document (Arup Urban Design Study December 2020) (p75) as having a low sensitivity to change.</p> <p>To this regard, in Appendix 2, the Apex Site should fall within a purple shading, which means it has 'opportunities for tall building clusters and/or landmarks' – not under yellow as currently shown which means 'opportunities for tall buildings within a local context. The Apex Site in the permission allows for three buildings above 20 storeys and another building at 16 storeys –the principle of a tall building cluster has already been accepted for this location and this context must be acknowledged. Similarly, it should be classed as B3 not B3a (same as the Entrance Site). For the Thessaly Road site, the context must acknowledge the fact that a 6-storey building has permission in terms of defining what a tall building would be. And for the Entrance Site the context must acknowledge the fact that a 17-storey building has permission.</p> <p>NPPF: positively prepared - The ability to meet the housing needs for the Nine Elms Opportunity Area might be severely compromised by the current proposed definition of a tall building, as it might lead to a resistance for the development of buildings that are eight storeys or more.</p> <p>NPPF: justified - No comment.</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - A tall building must be a minimum of six storeys; and in other locations, particularly the Nine Elms Opportunity Area, the definition must take account of the emerging context (which includes buildings above 50 storeys) and not consider any building above eight storeys and above as tall, regardless of context. In particular the Thessaly Road Site has permission for six storey buildings, the Entrance Site has permission for up to 17-storeys, and the Apex Site has permission for above 20-storeys. The Apex Site should be shaded purple as 'opportunities for tall building clusters and/or landmarks' and be classed as area B3.</p>	<p>accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p> <p>The borough-wide definition of a tall building has been developed in response to the low-rise character and sensitivities of extensive parts of the borough. The use of a single definition of a tall building provides an approach which is simple and easy to understand for residents, and which adds certainty to the implementation of the policy.</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1145	Policy LP4	Policy LP4 Tall buildings  As noted above, Map 14.1 and the tall buildings maps included at Appendix 2 of the draft plan and referenced in Policy LP4 need to be updated to accurately reflect the wording of the Ferrier Street Cluster site allocation.	Comment noted.	No change to the Local Plan required as a result of this representation.
Dandi Five Ltd Dandi Living		Mr Mark Thomson	Associate Director Savills	1090	Policy LP4	2.Policy LP4 (Tall Buildings) In respect of proposed wording of Policy LP4 we request that Part D is amended to reflect site specific allocations, which identify potential for tall buildings, where potential may exist outside of the locations identified in Parts B and C for tall buildings.  Criterion D (amend with new wording underlined as set out below) "Outside the locations identified in Parts B and C, proposals for tall buildings are likely to be inappropriate unless:1.the site forms part of a strategic masterplan area which has identified that the principle of accommodating tall buildings is acceptable;or2.the site has an allocation where a tall building may be appropriate; or 3.a convincing justification is provided to demonstrate the appropriateness of the site to accommodate a tall building(s).	Comment noted.	No change to the Local Plan required as a result of this representation.
TR Property Investment Trust PLC	TR Property Investment Trust PLC	Mr Chris Brown	Rolfe Judd Ltd	1378	Policy LP4	<b>See attachment on comment 1377 for the full representation with context</b>  <u>Policy LP4 Opportunities for Tall Buildings</u>  Site allocation WT8 states that all proposals for tall buildings will be assessed under emerging local plan policy LP4; this is also reiterated in Part J of Policy PM2.  The proposed tall building policy identifies areas within the Borough where tall buildings are considered acceptable however places a blanket restriction allocation for the rest of the Borough.  This blanket allocation does not consider the nature or appearance of certain areas within the Borough that already have tall buildings. Neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zone.  Notwithstanding our comment in the sections above, we consider that the Council should incorporate wording into Part D of the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.  While it is appreciated that the LB Wandsworth Local Plan and New London Plan Publication Version (2020) provides broad guidance for wider London given that site allocations are the key strategic reservoir for new homes within the Borough we would question the logic of placing restrictions on their capacity without undertaking detailed design development through the planning process. We strongly suggest that the Council amend the approach in relation to Allocated Sites to ensure alignment with the New London Plan Publication Version (2020).  This approach follows the Mayors guidance on Good Growth in the New London Plan Publication Version (2020) identifying that the Council should seek to intensify areas of high transport accessibility within the Borough such as the Ferrier Street Site Allocation.  Lastly, we consider that Part E of draft policy LP4 is removed because its wording is ambiguous. It requires proposals for tall buildings to be guided by the height identified in the Council's Urban Design Study. It is unclear whether a scheme would need to adhere strictly to this design guide or whether there is scope to propose a building of greater or lesser height. The clause has potential to undermine the considerations listed in parts A-D of the policy if the guidance needs to be strictly adhered to.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings.  The London Plan is clear that tall buildings should only be developed in locations identified as suitable in Local Plans. This proposed approach therefore confirms to the London Plan.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1227	Policy LP4	<p><b>See attachment for full context and associated images on comment 1224</b></p> <p><b>Policy LP4 Tall Buildings</b></p> <p>Policy DMS 4 Tall Buildings of the LBW Development Management Policies Document (DMPD) (adopted March 2016) states where 'tall buildings' may or may not be appropriate. For Area C, where Battersea Studios is located, Policy DMS 4 defines the height at which a building will be considered tall as "11 storeys and above".</p> <p>In comparison, the relevant Tall Buildings maps and Local Definitions Table 23.1 in Appendix 2 identify that the BDTQ falls within sub-area B3A, which is suitable for "opportunities for tall buildings within a local context", and where buildings within this sub-area will be considered as 'tall' if they are 5 storeys or above. As a result, any building over 5 storeys in the BDTQ will be assessed against the tests in draft Policy LP4.</p> <p>Schroders acknowledges that the Urban Design Study identifies the BDTQ as suitable for some taller buildings, and specifically identifies the principle of a tall building at Battersea Studios. Following publication of the BDTQ Framework, it considers that the definition for tall buildings in the BDTQ should be increased to 8 storeys.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The definition of a tall building changed. In accordance with Part A of the revised policy, buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings.</p>	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1210	Policy LP4	<p><i>Policy LP4 Tall Buildings Policy LP4 identifies locations (in Appendix 2) as being 'Opportunities for tall building clusters and/or landmarks', where the development would not result in any adverse visual, functional, environmental and cumulative impacts. We are supportive of Southside being identified as an area with opportunities for tall buildings.</i></p> <p><i>It is recognised that the criteria set out at Policy LP4 is comprehensive and the principle of the criteria is considered appropriate.</i></p> <p><i>We wish to express concern regarding Part E of Policy LP4 which states:</i></p> <p><i>"E. Proposals for tall buildings should be guided by the height identified in the Council's Urban Design Study.</i></p> <p><i>"We have reviewed the Council's Urban Design Study (prepared by ARUP) and wish to highlight the following concerns:</i></p> <p><i>-The Study does not take into account influential external factors such as Daylight, Sunlight and Overshadowing.</i></p> <p><i>-The Site is not within the protected vista of any LVMF views and none of the views identified in Wandsworth's Local Views SPD (2014) are relevant to the site. There are no views identified within the Wandsworth Town Conservation Appraisal, although it mentions 'changing vistas' along Wandsworth High Street. The importance of the key views identified in the Study should therefore be further justified.</i></p> <p><i>-The location of the site within a valley suggests that the proposed development will be visible from the surrounding higher areas, although there are not any obvious viewing areas, the urban form restricts direct views of the site, and there are not any areas of great sensitivity</i></p> <p><i>-</i></p> <p><i>There are already tall buildings on the site, so the introduction of further tall buildings in the scheme would not introduce new elements that fundamentally change the character of any long-distance views.</i></p> <p><i>-The Study states that plots closest to Wandsworth High Street should be limited to no more than 10% higher than existing buildings (excluding Sudbury House). It is not appropriate to place a cap on heights to this extent, particularly</i></p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings.</p> <p>The identified locations for tall buildings are not based on a detailed analysis of impacts on daylight and sunlight. This will be assessed as part of detailed proposals for a planning application, in accordance with policy LP2.</p> <p>The key views identified in the Study have been identified as valued features of specific character areas.</p> <p>The location of existing tall buildings which are considered inappropriate has not been considered as a sufficient justification for the creation of further tall building zones.</p> <p>The London Plan is clear that appropriate/maximum heights should be identified for all tall building zones.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>when removing one of the featured buildings on this frontage from the calculation. Proposals that include tall buildings should be assessed as part of the planning process.</p> <p>-The Study states that "the quantity of tall buildings in this scenario are assessed to be broadly appropriate in principle for the location, but some of the heights must be fully analysed within the local context to protect the character of Wandsworth Town Centre, in particular in relation to those close to Wandsworth High Street". Given a full analysis is yet to be undertaken makes it apparent that applying cap heights in this location, potentially rendering any redevelopment proposal unviable, would be highly inappropriate at this stage. Proposals that include tall buildings should be assessed as part of the planning process, and high-quality design should be encouraged.</p> <p>-We agree that the unit numbers included in the 'high density scenario' in the Urban Design Study is largely appropriate for the site. However, given the highly sustainably location and recognising that Southside has a High PTAL Rating of (4-6a), it is considered that this density could be further increased.</p> <p>In light of the above concerns, it is requested that the Council reviews the brief of the Urban Design Study and considers if it appropriate for this study to have such weight in the planning process in respect of part E of Policy LP4 which states that "Proposals for tall buildings should be guided by the height identified in the Council's Urban Design Study.</p>		
Stuart Gulliver	Albion Riverside	LM Durrant	Chairman and Managing Director DPDS	1234	Policy LP4	<p>Our client also has a specific interest in the proposed approach to managing proposals for tall buildings at the Battersea Bridge area and welcomes specific reference to the Urban Design Study and dedicated 'Tall Buildings' policy (Policy LP4) at part E of the Wandsworth Riverside policy.</p> <p>The Urban Design Study identifies our client's location of interest as holding 'Opportunities for tall building clusters and/or landmarks'. The Study goes on to identify prevailing heights of buildings for sub-areas within the Borough and defines at what heights the Policy LP4 (Tall Buildings) would be engaged for future development proposals. For the location of interest, it appears that developments of 5 storeys or above would be considered 'tall' and generally across the Borough developments of 8 storeys or above would be considered tall, thus engaging Policy LP4. Our client agrees with this approach.</p> <p>Our client also welcomes the dedicated Tall Buildings policy LP4 and the overall caveat that where opportunities for tall buildings are identified, this is subject to proposals not resulting in any adverse visual, functional, environmental and cumulative impacts as well as compliance with the relevant parts of the London Plan. It is assumed that amenity considerations, particularly in respect of existing residents and their homes, are encompassed within these criteria.</p> <p>The section of the policy titled 'Tall Buildings Near the River Thames Frontage' is directly applicable to our client's location of interest. It is noted that the policy considers the massing of tall buildings at riverfront locations with regards to their front (relative to the river) and back elevations. We would suggest, however, that due consideration must be given to the impact that massing of a tall building would have with respect to all immediate surroundings (not just front and back relative to the river), and a particular emphasis should be made on addressing and mitigating impact on existing adjacent land uses, especially existing residential properties.</p> <p>Our client welcomes the specific considerations of 'Microclimate and Lighting' in the Tall Buildings policy, but would suggest that specific reference also needs to be made to consider the impact of wind patterns on tall buildings and their surroundings on the riverfront where, by definition, there are no other structures</p>	<p>The impact of development proposals on amenities of adjoining properties will be assessed in line with policy LP2. This is not repeated in policy LP4.</p> <p>The consideration of wind patterns is required by policy D9 of the London Plan. Local Plan policy LP4 requires development proposals for tall buildings to avoid any adverse visual, functional, environmental and cumulative impacts, having regard to and complying with the criteria set out in Parts C and D of the London Plan Policy D9.</p>	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>to break the wind. This is particularly important given the greater frequency of severe weather arising from climate change.</p> <p>We trust that these representations will be taken into consideration as the Wandsworth Local Plan progresses from 'pre-publication' to 'publication' status over the course of the year, and if there are any elements of this representation which the Council wish to discuss further we would be more than happy to engage.</p>		
DTZ Investment Management Limited	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP	1253	Policy LP4	<p><b>See attachment on comment 1250 for the full representation for context and images.</b></p> <p>EMERGING POLICY LP4: TALL BUILDINGS AND THE COUNCIL'S URBAN DESIGN STUDY</p> <p>The principle points within these representations are in respect of the approach to tall buildings which we note will be further informed by the outcomes of the Regulation 18 consultation, as set out at paragraph 14.47 of the 'Pre-Publication' Draft Local Plan.</p> <p>Emerging Policy LP4 relates to Tall Buildings in the Borough. Part A of the Policy states that proposals will trigger assessment against the detailed criteria in this policy where they meet or exceed the local definitions of tall buildings as set out in Appendix 2 [Table 1] of the 'Pre-Publication' Draft Local Plan.</p> <p>The Site is identified within Appendix 2 of the 'Pre-Publication' Draft Local Plan as being located within an area with 'opportunities for tall buildings within town centres and along strategic routes'. Whilst our Client supports the identification of the Site as being located within an area identified as having opportunities for tall buildings, it is proposed that Clapham Junction Town Centre is identified as an area with 'Opportunities for tall building clusters and/or landmarks' and that Appendix 2 is amended accordingly.</p> <p>The Site is located at a historic junction and convergence of routes, where a landmark building would aid wayfinding and mark Clapham Junction Town Centre. Paragraph 14.48 of the 'Pre-Publication' Draft Local Plan defines what is considered to be a 'landmark' building as:</p> <p>"...a building or structure that stands out from its background by virtue of height, size or some other aspect of design. Landmark buildings, in townscape terms effectively act as a pointer to guide people around the borough and makes a significant contribution to local distinctiveness."</p> <p>The characteristics of the Site, as noted, are consistent with the qualities identified by the Council in relation to sites where landmark buildings may be appropriate; it marks the convergence of major routes within the designated Clapham Junction Town Centre, at the Clapham Junction Interchange, and at a point of prominence in the topographical and urban structure of the area. As Europe's busiest interchange station, the potential of Clapham Junction to evolve and grow should be recognised, a view which is shared by the Mayor given its Opportunity Area designation. Our Client also notes that Wandsworth Town Centre includes in part an area identified with 'Opportunities for tall building clusters and/or landmarks', and believes that Clapham Junction warrants this, particularly given its higher transport accessibility rating.</p> <p>With regard to the criteria set out within the 'Pre-Publication' Draft Local Plan, the Site is located within Sub-Area B5, where the local definition of a tall building is considered as 6 storeys or above, which is based upon prevailing heights in the surrounding area (our emphasis). Paragraph 3.9.3 of the [adopted] London Plan states that "in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context." In light of this, Appendix 2 and emerging Policy LP4 should have greater regard to locations within the</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.</p> <p>The reference to 'landmark buildings' was removed as a result of amendments to the policy.</p> <p>In accordance with Part A of the policy, buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings. The borough-wide definition of a tall building has been developed in response to the low-rise character and sensitivities of extensive parts of the borough. The use of a single definition of a tall building provides an approach which is simple and easy to understand for residents, and which adds certainty to the implementation of the policy. The definition itself does not negatively affect the capacity of subject site.</p> <p>Part E of the policy was removed as a result of amendments to the policy.</p> <p>The suggested changes to the wording of policy criteria are not considered appropriate.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Borough with the potential to accommodate significant growth in the plan period and tall building definitions revised as appropriate.</p> <p>Part B of emerging Policy LP4 sets out that proposals for tall buildings may be considered appropriate where the development would not result in any adverse visual, functional, environmental and cumulative impacts, having regard to and complying with the criteria set out in Parts C and D of the [adopted] London Plan Policy D9. This part of the policy also provides a series of criteria which any proposals for tall buildings should address. We have reviewed the wording of this part of the policy and provide suggested amended wording in red below:</p> <p>9. Proposals for tall buildings may be appropriate in locations identified in Appendix 2 [Figures 2-10] as being 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes', where the development would not result in any adverse unacceptable visual, functional, environmental and cumulative impacts, having regard to and complying with the criteria set out in Parts C and D of the emerging London Plan Policy D9. In addition, proposals for tall buildings should address the following criteria:</p> <p>Visual Impacts</p> <p>1. The design of tall buildings should respect <u>the special qualities or characteristics of identified key view corridors towards strategic landmarks across the borough and in neighbouring boroughs, including distinctive roof line features. The siting of tall buildings should have regard to the location and visual setting of heritage assets, including any important views and Tall buildings should not obscure important views of nearby heritage assets, and should avoid altering the skyline by becoming features of the backdrop. Effects on heritage assets (including through development in their setting) will be assessed under policy LP3.</u></p> <p>2. <del>The location of tall buildings should avoid substantial visual interruptions in areas with otherwise very consistent building and/or roof lines.</del></p> <p>3. In case of landmark tall buildings, the development should successfully respond to the analysis of key view corridors towards the site to ensure the location, form and detailing accentuate its prominence within the wider context. In case of other tall buildings, the development should respect the surrounding context and preserve the hierarchy of existing prominent view corridors.</p> <p>4. In case of landmark tall buildings, proposals should consider the design of the lower, middle and upper parts of the tall building and how they work together and with the surrounding area and mid-range and long-range views.</p> <p>5. Proposals should be supported with graphic 3D modelling to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline. The 3D modelling must also incorporate buildings with extant planning permission to ensure that the future nature of views is considered in a holistic way.</p> <p>6. In case of tall buildings located near to or within existing tall building clusters, the proposal should follow the established principles of group composition including through the provision of noticeable stepping down in height around cluster edges.</p> <p>Spatial Hierarchy</p> <p>7. The massing of tall buildings should respect the proportions to of their local environment, including the consideration of the width of adjacent streets as well as public open spaces, parks and watercourses, and should be designed so as not overwhelm the street and adjacent context.</p> <p>8. In case of landmark buildings, the design and location of development should consider their role in wayfinding, such as, acting as landmarks or gateway features marking town centres or local centres.</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>9. In case of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting."</p> <p>It is suggested that Part B (2) of emerging Policy LP4 is struck out as the current wording makes no allowance for emerging character and is inherently in conflict with the identification of the Opportunity Area.</p> <p>We also consider that Part E of emerging Policy LP4 should be amended. Our suggested text is provided in red below:</p> <p><u>"E. Proposals for tall buildings should be guided by the height identified in the Council's Urban Design Study, give consideration to the evolving townscape context, visual impact and the findings of the Urban Design Study alongside consideration of viability, regeneration potential of the area, capacity of the area to accommodate development and public transport accessibility, and any relevant planning policy designations (such as Opportunity Areas) for future growth. With regard to each of these considerations, proposals for tall building will be considered on a case-by-case basis and a balanced planning judgement made in respect of proposals."</u></p> <p>The current wording of Part E of emerging Policy LP4 places too much reliance on the Urban Design Study ('UDS') prepared by Arup, a document which provides high level guidance with regards to the design and siting of tall buildings in the Borough, and forms part of the emerging Local Plan evidence base. To our knowledge, there has been no engagement with key stakeholders or potential tall building developers during the preparation of this study, and to give it such weight in the emerging policy without meaningful engagement goes against the approach advocated within both the National Planning Policy Framework and London Plan.</p> <p>Our Client considers that the UDS is not sufficient in itself to guide heights and densities within the Borough as it is limited to a consideration of design and siting of tall buildings based upon a consideration of the existing character of the local character areas identified within the document. This is acknowledged to some extent at Appendix A (pg. 206) of the UDS where it is stated that "the scenarios developed are prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site specific masterplan proposals." The deliverability of sites allocated within the plan is critical in order for the Council to meet their housing and employment targets. For policy to rely, to the extent that it does, on a study that does not reflect the deliverability of sites is not in our view a sound approach and we would therefore propose that the UDS is attributed considerably less weight in the wording of Policy LP4.</p> <p>Appendix A (pg.206) of the UDS goes on to state that "in all cases, further analysis will be required to determine actual proposals for individual sites on the basis of detailed review and analysis of the specific local context which is not part of the scope of this borough-wide study." It is appropriate that this statement of need for further analysis is reflected in the provisions of Part E of emerging Policy LP4.</p> <p>The indicative massing model for Clapham Junction Station Approach presents a 'medium density' scenario with building heights ranging between 6 and 15 storeys as 'appropriate in principle' in the context of Clapham Junction Conservation Area and landmark buildings' (p.221). By 'landmark buildings' we understand the UDS to refer to the listed Falcon Hotel Public House, the Arding and Hobbs store, and the Clapham Grand. However, the redevelopment of the Site, even at a lesser scale than that shown in the UDS, would occlude the 'unfolding view of Clapham Junction from the railway from Waterloo, with the view of the towers in the Clapham Grand signalling arrival at the station' - identified as an important view at p.82 of the UDS and which draft Policy PM4 seeks to protect.</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>In our Client's view, therefore, Part E of emerging Policy LP4 places undue reliance on the UDS and in so doing inherently conflicts with the requirements of draft Policy PM4. We have commented particularly on the views in question in our specific commentary on draft Policy PM4 below.</p> <p>The Plan needs to be clear that judgments as to the acceptability of tall buildings and high density development will depend on a range of factors, not just townscape considerations.</p> <p>Our Client would also note that this massing model as shown does not take into account the practicalities of access to Clapham Junction Rail Station or permeability through the site and integration with the town centre, both of which are key considerations to which any future development must have regard under emerging site allocation CJ2 (Clapham Junction Station Approach). Emerging site allocation CJ2 also seeks the delivery of a high quality civic building, improvements to the tunnel under Falcon Road, development of a high-quality landscape led public realm and re-provision of existing office space including affordable workspace, amongst other requirements. The existing commercial accommodation current trades well, and the practicality is that if the emerging policy is not sufficiently supportive of a need for a viable, deliverable scheme then the other significant planning benefits sought by site allocation CJ2 (Clapham Station Approach) will not be realised.</p> <p>The policy must make clear that it seeks a planning balance that examines the potential for townscape harm set beside other significant benefits that a development might offer, and also take into account the visions for areas and key planning objectives and direct development where it will assist in delivering these objectives. The location of the greatest density within the Borough should take into account both social and economic reasons alongside design considerations.</p> <p>On the above basis, Part E of Policy LP4 should be struck out and replaced with wording along the lines of that suggested above that recognises that an assessment of a range of site-specific factors (not simply townscape considerations) are needed to be considered as part of the planning balance in order to justify a tall building.</p>		
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1304	Policy LP4	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP4 Tall Buildings</b></p> <p>The current tall building policies identifies areas within the Borough where tall buildings are considered acceptable however places a blanket restriction allocation for the rest of the Borough.</p> <p>This blanket allocation does not consider the nature or appearance of certain areas within the Borough that already have tall buildings. Neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zone.</p> <p>We consider that the Council should incorporate wording into Part D of the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings.</p> <p>We also have concerns regarding the relationship of the tall building approach with the shortly to be adopted New London Plan Publication Version (2020).</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. This results in a stronger and more plan-led policy approach, which is in accordance with the London Plan.</p> <p>In accordance with Part A of the policy, buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings. The borough-wide definition of a tall building has been developed in response to the low-rise character and sensitivities of extensive parts of the borough. The use of a single definition of a tall building provides an approach which is simple and easy to understand for residents, and which adds certainty to the implementation of the policy. The definition itself does not negatively affect the capacity of subject site.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Notably Appendix 2 of the draft Local Plan states that the tall building definition for the Kirtling Street Cluster is 8 storeys. While the Council</p> <p>acknowledge that tall buildings are acceptable for the site, the low bar on what is considered tall fails to give weight to the level of development required in these Opportunity Areas for the Council to meet its own targets.</p> <p>While it is appreciated that the LB Wandsworth Local Plan and New London Plan Publication Version</p> <p>(2020) provides broad guidance for wider London given that site allocations are the key strategic</p> <p>reservoir for new homes within the Borough we would question the logic of placing restrictions on</p> <p>their capacity without undertaking detailed design development through the planning process. We</p> <p>strongly suggest that the Council amend the approach in relation to Allocated Sites to ensure</p> <p>alignment with the New London Plan Publication Version (2020).</p> <p>This approach follows the Mayors guidance on Good Growth in the New London Plan Publication</p> <p>Version (2020) identifying that the Council should seek to intensify areas of high transport</p> <p>accessibility within the Borough such as the Kirtling Street Site Allocation</p>		
Ms Margaret Brett	Southfields Grid Residents' Association			1407	Policy LP4	<p>Planning Policy Team</p> <p>I am writing to respond to your Draft Local Plan consultations on behalf of the Southfields Grid Residents' Association. We are a long established residents' association representing those living and working in this area of Southfields that is bounded by Pirbright Road, Revelstoke Road, Merton Road, west side, and Elsenham Street.</p> <p><b>Tall Buildings</b></p> <p>We generally welcome the general thrust of the Plan but have serious concerns about your policy proposals for Tall Buildings in our area. Our area of Southfields is predominantly made up of Edwardian terraces and the shopping streets of the centre in Replingham Road/ Wimbledon Park Road are mainly late Victorian buildings with some later development. These are three storey buildings with some later 4 storey ones. The buildings built on the railway bridge are one storey. The area has a village like character with many independent shops and is prized by the local community.</p> <p>Close scrutiny of the Plan has revealed that the centre of Southfields is being designated as being suitable for tall buildings of 5 storeys. This proposal is virtually hidden on the two maps on pages 223 and 396 which lack sufficient definition to find the precise location. There has been no discussion with local representative groups about this specific proposal and your planning policy team did not respond to our email enquiry about this. Although we note that the proposal appears at page 189 of the Urban Design Study, which even mentions</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. No mid-rise or tall building zones are proposed in the Southfields local centre.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>6 storeys, this is self contradictory insofar as Southfields is identified as an area of high sensitivity to change on page 97. Page 97 also recommends that there be respect for the interesting buildings at Southfields local centre and that any new development be of sympathetic scale, design and proportions. We vehemently oppose this proposal for tall buildings as being ill considered and destructive of our local centre.</p> <p>We are also concerned about the proposals for the area between Bodmin Street through to the north of Kimber Road and from Merton Road to King George's Park, as being similarly designated as being suitable for tall buildings. Much of this is a valued industrial and business area which contributes to the local economy and such a high development over this extensive area would be overly dominant in the park, and not respect its setting (see PM10A). Apart from the commercial area, the outline encompasses a large secondary school, the Marines base, a small modern residential area and a sheltered housing block. This does not seem to be thought through.</p> <p>Separately we are puzzled by the outline used on the map to designate the tall buildings area proposed for Southfields centre. This outline does not follow the curtilage of the buildings but passes through many of them and includes the railway embankments. For the record Southfields is the London Underground station for the Wimbledon Tennis championships.</p> <p>We support the proposals for Wandle Valley, particularly the opening up of the Wandle Trail and increasing pedestrian permeability. We are keen to see the park enhanced giving the riverside more definition and with greening and increased bio-diversity.</p>		
Michele Bailey				1420	Policy LP4	<p>For the attention of Adam Hutchings</p> <p>The residents and members of the Burstock Road Residents Association would like to register our concern about tall buildings in Putney, particularly about defining Putney High Street as appropriate for high rise developments.</p> <p>We are all very disappointed and concerned that the Levellers, an inappropriate high rise development in a tightly packed space, was granted permission on appeal. Further, that the 10 storey hotel on the corner of narrow Putney Bridge Road and Putney High Street was granted permission.</p> <p>The local plan needs to have robust restrictions on high rise developments to ensure developers build within appropriate boundaries to suit and enhance the local area, not ruin it.</p> <p>Thank you.</p> <p>The Burstock Road Residents Association</p> <p>c/o Michele Bailey, secretary</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.
Michael Atkins	Senior Planning Officer Port of London Authority			1466	Policy LP4	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>Policy LP4: Tall Buildings</p> <p>In principle support the parts 10 – 12 of the policy with regard to tall buildings near the River Thames frontage. As part of the 'Microclimate and Lighting' section of the policy. It is recommended that reference is also given to the need to ensure that development adjacent to riverside areas also avoids light spill, to prevent light spill into the watercourse or adjacent river corridor habitat and minimise impacts on navigation and ecology.</p>	This is reflected in criterion B.13.	No change to the Local Plan required as a result of this representation.
Safestore		Matthew Lloyd Ruck	Planner Savills	1386	Policy LP4	<p><b>See attached to comment 1382 the full representation for context</b></p>	Support noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Achieving Design Excellence – LP4 Heights</p> <p>The tall building designations within this local plan are considered to be helpful. Designating sites appropriate for taller buildings, clusters and landmarks around the River Thames will ensure that there is potential for windfall sites to be delivered that provide a significant amount of commercial or residential floor space within the borough</p>		
Ron Mobed				1381	Policy LP4	<p>Dear recipient, I have read the attached Residents Association letter which was sent to you on February 26th and support the objections listed in the letter. Best wishes,</p> <p>Ron Mobed,</p> <p>I am writing on behalf of the Deodar-Merivale-Florian Roads Residents Association to express our strong objection to the proposal, in the Pre-Publication version of the Draft Local Plan, to permit high rise buildings to be built at the western end of Putney Bridge Road (PBR). We believe that high rise buildings should be permitted no further east along Putney Bridge Road from Putney High Street than Brewhouse Lane on the north side and the existing hotel on the corner of PBR and Burstock Road on the south side.</p> <p>Permitting high rise buildings to encroach further east along PBR than this would seriously damage the pleasant residential character of the neighbourhood on both sides of PBR. In addition:</p> <ul style="list-style-type: none"> <li>&gt; The 2–3 storey residential buildings to the north of PBR at the western end of Deodar Road would suffer unacceptable loss of light and particularly direct sunlight in autumn, winter and spring.</li> <li>&gt; The single storey historic almshouses on the southern side of PBR between Burstock and Atney Roads would be seriously overshadowed.</li> <li>&gt; The preservation of the historic character of the neighbouring conservation areas would be adversely affected.</li> <li>&gt; Further over development of this stretch of PBR would aggravate the existing traffic congestion at the junction of PBR and the High Street, where traffic frequently backs up to the east beyond Oxford Road in the morning rush hour.</li> </ul> <p>We appreciate that this is still only a draft document but we are anxious that this, we hope, mistake is rectified as soon as possible and that no high rise development will be proposed or permitted further east along PBR than Brewhouse Lane on the north side and the hotel on the corner of PBR and Burstock Road on the south side in the final Draft Local Plan scheduled to be published in Spring 2022</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1396	Policy LP4	<p><b><u>L4 Tall Buildings Pg 218</u></b></p> <p>SGCARA objects to the increase in 'tall buildings' allowed/proposed in many areas in Wandsworth Borough.</p> <p>Putney High St is already subject to a degree of 'canyonisation' with recent PPs granted. This not only creates an over-bearing environment, with increases in depressing shadowing, but it will trap pollution. This is significant, considering that Putney High St has had terrible air pollution, mitigated now to some extent by the reduction in diesel buses. This air-quality improvement needs to be able to continue, not be segt-back.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. No mid-rise or tall building zones are proposed in the Southfields local centre.</p> <p>Changes were made to policies LP1 and PM5 to ensure that development proposals avoid creating a canyon effect through appropriate set back; and by stepping down heights to avoid adverse impacts on local character and the street scene.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>In Wandsworth Town Centre, the abandonment of the previous 'tall buildings' limit has also been severely detrimental &amp; taken focus from the core elegant Georgian, Victorian &amp; Edwardian buildings.</p> <p>In Southfields centre, SGCARA strongly Objects to the proposal to allow buildings of up to 5 storeys in our shopping vicinity. Buildings within this area are currently no higher than 4 storeys. This limit gives prominence to the attractive roof-lines of the Edwardian shopping parades that dominate the area marked out for possible 5-storey limit (Pg 396). (The most notable parade is that on the North East part of the proposed area, with especially notable roof-lines.) There is currently a PA under consideration for extension of the old Nat West Bank building. This would also increase the storeys from 3 to 4 in parts, retaining the elegance of the original roof-line &amp; remain in keeping with the norms of Southfields Centre. We strongly resist any attempt to allow 5-storey buildings in Southfields Centre.</p>		
Diana McCann	Boroughs Coordinator The Blue Green Economy			1430	Policy LP4	<p><b>LP4 Tall Buildings - Microclimate</b></p> <p>Council should consider adoption of recent best practice City of London Corporation guidelines for thermal comfort and wind microclimate. <a href="https://www.cityoflondon.gov.uk/services/planning/microclimate-guidelines">https://www.cityoflondon.gov.uk/services/planning/microclimate-guidelines</a></p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Cyril Richert	Clapham Junction Action Group			1675	Policy LP4	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>LP4 Tall Buildings page 216</p> <p>In the past, the policy was using the term "inappropriate" or "sensitive". We were told by Planners that "inappropriate" means only that any tall building would trigger then the list of criteria to assess the proposal.</p> <p>It created a lot of ambiguity and as a developer put it38: "tall buildings in this location are likely to be inappropriate. [...] It does not go as far as advising that the site would not be suitable for tall buildings"</p> <p>In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we wanted "to see the current approach to tall buildings amended". The response was "Policy LP 4 (Tall Buildings) includes a reference to the historic environment and the cumulative impacts" 39 . The amendment is welcome.</p> <p>Therefore, we welcome the amendment on the current approach to tall buildings, especially the cumulative impact name in the policy.</p> <p>1. Proposals for tall buildings may be appropriate in locations identified in Appendix 2 [Figures 2-10] as being 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes', where the development would not result in any adverse visual, functional, environmental and cumulative impacts,</p> <p>However, in order to be effective, the criteria should not be subject to personal judgement (i.e. statements such as "adverse visual impact will be balanced by the benefits" should be resisted).</p> <p>For the purpose of illustration, we quote the way the planning officer manager to circumvent all issues on a recent application using personal judgement and taste, in order to recommend the proposal (it was refused in Committee)40:</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. This results in a stronger and more plan-led policy approach.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The size of the zone highlighted in blue has been scaled down as a result of changes to the policy.</p>	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>- although it is larger than the surrounding buildings, its layout and it comprising a range of heights would ensure that it does not unduly dominate the locality. → Reason given for refusal at the PAC: refused on the grounds that the scale, site, massing and layout of the proposal would be an inappropriate and the proposed development would result in undue harm to the amenity of neighbouring occupiers</p> <p>- the scale and massing of the proposed development is not considered to be unduly harmful to the surrounding area. → Reason given for refusal at the PAC: refused on the grounds that the scale, site, massing and layout of the proposal would be an inappropriate and the proposed development would result in undue harm to the amenity of neighbouring occupiers</p> <p>- it has been demonstrated that the proposed development would not have an undue impact upon the local townscape. [demonstrated by? We don't need to know apparently!]</p> <p>- the proposed building of up to 6-storeys would undoubtedly significantly change the local townscape [...] the proposed building of up to 6-storeys would undoubtedly significantly change the local townscape ...etc is translated in the criteria as: As identified under the Design heading of this report, the proposed development would enhance the local street scene [This is a personal judgement; otherwise how can we explain that both the PAC and the 39 objections all considered that it would be detrimental to the area]</p> <p>Therefore, a review of the criteria is needed. For example:</p> <p>The location of tall buildings should avoid substantial visual interruptions</p> <p>What is the definition of substantial? If it is possible to write: "the proposed building of up to 6-storeys would undoubtedly significantly change the local townscape but it is not considered to generate substantial harm to the surrounding", then the criterium is ineffective.</p> <p>It should clearly specify that schemes consisting of over-development, having a detrimental effect on the local environment and at risk of harming the neighbourhood will be refused.</p> <p>Most importantly, the use of "should" means that it is not mandatory and therefore can be dismissed. The verb "must" would be perfectly appropriate, and it is actually used in the second part of criteria 5: "The 3D modelling must also incorporate buildings". We note that when redacting LP5 Residential Extensions and Alterations, planners did not use the same precautions and the wording is much more directive.</p> <p>If all criteria can be circumvented "on balance" of the benefits that the scheme "could" generate, the list is ineffective and serve no purpose.</p> <p>In addition to general comments above, all the verbs "should" must be replace by "must".</p> <p>4.39 Recognising this, the Urban Design Study has developed a number of local definitions, which are based on an assumption 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</p> <p>We note that the definition has changed. In the current policy on Tall Building states41:</p> <p>Tall buildings may also be appropriate in the Lombard Road/York Road Riverside Focal Point. Outside these areas the borough is largely characterised</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>by low-to medium-rise housing and tall buildings are likely to be considered inappropriate.</p> <p>In most of the borough, tall buildings, i.e. 5 storeys previously, were considered inappropriate. This is not the case anymore apparently. Therefore, we require explanation on the meaning of "local context". Does it mean that one tall building in the all vicinity will trigger the possibility for further similar buildings not being considered tall?</p> <p>4.39 The definition is ambiguous and "local context" must be replaced or explained. We suggest "adjoining buildings" or "close vicinity".</p> <p>4.45 There might however be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.</p> <p>4.45 Without clear definition of "circumstances", this wording must be resisted, as it is ambiguous; obviously all applicants think that their proposal is acceptable!</p> <p>Map 14.1 Tall Buildings page 221</p> <p>We require explanation regarding the inclusion of the zone highlighted in blue on the image beside.</p> <p>It includes:</p> <ul style="list-style-type: none"> <li>- the Victorian Terrace Houses of Mossbury Road (which include house #22 Mossbury Road in the local assets list, one of the oldest houses in Battersea),</li> <li>- Frontage on Lavender Hill which is described in this draft local plan as: "The character of the area is derived from its surviving Victorian and Edwardian townscape, as exemplified by the terraced shops along St John's Road, St John's Hill and Lavender Hill, which remain the centre's focus for retail." 42</li> <li>- Eccles Road with Victorian Terrace houses, Battersea Library (listed building).</li> </ul> <p>According to the map, all the locations above have opportunity for tall buildings. We require explanation for specific inclusion of the Battersea Central Library in the zone having opportunity for tall building, as shown with a specific encroachment on the map, south of Lavender Hill.</p> <p>We can only assume that this is a mistake and therefore the map must be amended to remove the zones above.</p> <p>Suggested map beside.</p>		
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1543	Policy LP4	<p><b>See attachment in representation 1534 for context</b></p> <p>Chapter 14 Achieving Design Excellence</p> <p>LP4 Tall Buildings / Map 14.1 Tall Buildings – COMMENT</p> <p>L&amp;G support the allocation of the Homebase site (WT12) as an Opportunity for 'tall buildings within town centres and along strategic routes'; and the B&amp;Q site (WT13) as an Opportunity for 'tall building clusters and/or landmarks'.</p> <p>It is unclear however why the plan differentiates between 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes'. The 2020 Urban Design study does not and there is no reasoned justification in the Reg 18 Plan. This requires</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings.</p> <p>The reference to 'landmark buildings' was removed as a result of other amendments to the policy.</p> <p>The revised version of the policy does not differentiate between 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes'. This is now embedded in the identified appropriate height ranges for each zone.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>clarification. It is also unclear what the term 'landmark' buildings refers to. It may be more appropriate to create a single definition.</p> <p>1. <del>Proposals for tall buildings should be guided by the height identified in the Council's Urban Design Study.</del></p> <p>We propose the removal of this part of the policy as it is ambiguous and inflexible and has not been subject to viability testing.</p>		
Ian Harrison	Director Downing	Mrs Jan Donovan	Director Rolfe Judd Planning	1372	Policy LP4	<p><b>See attachment on comment 1371 for full representation and context</b></p> <p><b>Draft Policy LP4 – Tall Buildings</b></p> <p>The draft Tall Building policy sets out criteria for the appropriateness of tall buildings. The W4 allocation is identified as a location suitable for tall buildings which is welcomed. However part E of the policy requires that proposal for tall buildings should be guided by the height identified in the Council's Urban Design Study.</p> <p><b>Response</b></p> <p>Policy LP4 sets our significant policy guidance for the appropriateness of tall buildings including, visual impact, spatial hierarchy, location, micro-climate, lighting, ground floor uses and public realm. That along with the design policies provides a framework for the appropriateness of tall buildings.</p> <p>The Urban Design Study completed by GL Hearn provides a high level assessment for the borough on suitable locations for tall buildings. However it does not enter into site specific analysis of the detail set out in Part B of the policy. As such whilst the Urban Design Study is welcomed in the level of analysis undertaken, it should not be used to limit heights of buildings on sites that can meet the requirements of Part B of the same policy.</p> <p><b>Representation</b></p> <p><b>The approach to the assessment and location of tall buildings is generally supported under Policy L4, subject to Part E of the policy being deleted</b></p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings.	No change to the Local Plan required as a result of this representation.
Rebecca Skinner	Peabody and Mount Anvil	Miss Ailish Collins	Planning Consultant Rolfe Judd Planning	1376	Policy LP4	<p><b>See attachment on comment 1374 for plans, appendix and background context.</b></p> <p><u>Opportunities for Tall Buildings</u></p> <p>Appendix 2 of the draft Local Plan includes a set of maps, establishing locations as 'Opportunities for tall building clusters and/or landmarks', 'Opportunities for tall buildings within town centres and along strategic routes', and 'Opportunities for tall buildings within a local context' throughout the borough.</p> <p>Proposed Policy LP4(B) (Tall Buildings) states that "proposals for tall buildings may be appropriate in locations identified in Appendix 2... where the development would not result in any adverse visual, functional, environmental and cumulative impacts, having regard to and complying with 216 the criteria set out in Parts C and D of the emerging London Plan Policy D9". Development proposals for tall buildings would be subject to addressing the 20 criteria listed in part (C) of this policy.</p> <p>Further, proposed Policy PM4(A)(2) as it relates to the Clapham Junction and York Road/Winstanley Regeneration Area states that "development, at identified growth locations, will be supported where... height and massing are appropriate and conform to the approach for tall buildings".</p> <p>Part (G) of this policy goes on to state that "tall buildings in Clapham Junction and York Road / Winstanley Regeneration Area will be supported where they</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. As a result of changes to the policy, parts of the Peabody Estate have been identified as a tall building zone.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>are in locations identified as appropriate for tall buildings in Appendix 2, subject to addressing the requirements of Policy LP 4 (Tall Buildings)".</p> <p>New London Plan Policy D9 (Tall Buildings) part (B)(3) also notes that "tall buildings should only be developed in locations that are identified as suitable in Development Plans".</p> <p>The Peabody Estate is not identified in Appendix 2 as an opportunity area for tall buildings.</p> <p>As set out in the emerging policy wording of LP4 and PM4 above and Policy D9 of the London Plan, it is suggested that any site outside of this designation would be an inappropriate location for a tall building. As the site currently has planning permission for tall buildings (ranging from 6-12 storeys), it is inherently established as an appropriate location for height which has been tested through the planning application process. The approved development makes a clear justification for height within the existing local context, which the London Borough of Wandsworth has approved as an appropriate site response. Whilst the sensitivities of the surrounding area are acknowledged, the principle for height has already been established on the site, therefore the policy should recognise height in this location as part of the future local context height.</p> <p>As aforementioned, the site is well located in terms of public transport and accessibility, being next to the Clapham Junction train station and fronting a strategic transport route. The site benefits from the highest PTAL rating and will be even more accessible once Crossrail 2 opens. The northern part of the site is already located within the Town Centre designation under the adopted plan, and given the sites excellent location near a wide range of public transport options and on a strategic route, would make the site characteristically appropriate for tall buildings, following the Council's own approach for enabling "opportunities for tall buildings within town centres and along strategic routes".</p> <p>The 2020 Urban Design Study states that "the areas around Clapham Junction Station, sub area (a) and Falcon Lane, sub area (b) area are key locations in which targeted change may enhance character, legibility and the sense of arrival due to the presence of more detracting features". Whereas in the 2011 Urban Design Study, the site was identified as one of the main opportunity sites within Clapham Junction. Given the importance of this site as an area for targeted growth through the adopted plan, a similar policy approach should be taken here through the inclusion of the site within its own character sub-area. This would follow Wandsworth's own method for assessing and allocating sub-character areas, and allow for the character and context of the site to be assessed on its own merits as being able to support taller buildings due to its location and accessibility.</p> <p>In townscape terms, the site is bordered on three sides by infrastructure (railway tracks, station forecourt and St John's Hill and Railway Bridge). This land is not sensitive and forms important transport routes in and out of the area. They also provide urban gaps within the local spatial character which, together with the northern most part of Wandsworth Common, ensures that tall development would be appreciated at a distance, forming part of a new development and providing legibility for the southern entrance of Europe's busiest railway interchange.</p> <p>In addition to the above, there is a large area of land to the north of St John's Hill across the road from the site, which is identified as being appropriate for tall buildings on the proposed maps. The inclusion of this land signifies an acceptance that the western end of Clapham Junction is anticipated</p> <p>to experience significant change in future, and in particular, will likely see an increase in building heights in this area. The tall buildings zone should therefore include the Peabody Estate, to ensure a more consistent policy approach is brought forward for this area of Clapham Junction.</p> <p>Taking into consideration the site's location within a town centre (as per the adopted Local Plan)and on a strategic route, it would be appropriate to include</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>the Peabody Estate on the Tall Buildings Map at Appendix 2 as having "opportunities for tall buildings within town centres and along strategic routes" (shown in peach colour).</p> <p><b>Proposed Area for Review</b></p> <p>As set out above, a number of changes are sought to the draft Local Plan as it relates to the Peabody Estate site. These changes are summarised below:</p> <p>Reinstate Site Specific Allocation 64 'Peabody Estate'; Reinstate the northern part of the site within the Clapham Junction Town Centre boundary; and Include the site on the Tall Buildings Map at Appendix 2 as having "for tall buildings within town centres and along strategic routes" (shown in peach colour).</p> <p>A copy of the proposed changes to the relevant maps is included as Appendix 2.</p>		
Mr Christopher Hayhurst	Development Project Manager Wandsworth Borough Council: Housing Strategy and Development	Miss Rochelle Flemming	Principal Planner Tetra Tech Planning	1391	Policy LP4	<p><u>Draft Policy LP4 Tall Buildings</u></p> <p>Draft Policy LP4 and Map 14.1 (Tall Buildings) indicates that the Crewkerne Court Garages site and The Alders Estate site are both located within areas with "opportunities for tall buildings within a local context". This designation is supported by our Client. The development designs reflect this designation, incorporating tall buildings as part of there development of both sites. The development designs have been informed by the character of the surrounding areas which reflect the approach set out in Draft Policy LP4.</p> <p>To conclude, this letter is submitted by Tetra Tech and forms the representations of our Client, Wandsworth Borough Council: Housing Strategy and Development, to the Draft Local Plan –Regulation 18 Consultation. Our Client is supportive of the policies within the Draft Local Plan and welcomes Site Allocation RIV11 and the identification of areas with opportunities for tall buildings, in relation to two sites that our Client is bringing forward for redevelopment at Crewkerne Court Garages, Battersea Church Road and The Alders, Streatham Park.</p>	Support noted.	No change to the Local Plan required as a result of this representation.
DTZ Investors		Neil Wells	Quod	1505	Policy LP4	<p>Chapter 14 Achieving Design Excellence</p> <p>LP4 Tall Buildings / Map 14.1 Tall Buildings –COMMENT</p> <p>DTZi support the allocation of the site 'NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8' as an Opportunity for 'tall building clusters and/or landmarks'.</p> <p>E. Proposals for tall buildings should be guided by the height identified in the Council's Urban Design Study.</p> <p>We propose the removal of this part of the policy as it is ambiguous and inflexible and has not been subject to viability testing.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings.	No change to the Local Plan required as a result of this representation.
Lockguard Ltd		Mr David Shiels	Associate DP9	1555	Policy LP4	<p><b>Draft Policy LP4 –</b></p> <p>Tall Buildings Draft Policy LP4 outlines areas where proposals for tall buildings may be appropriate in the borough. These locations are identified in the Tall Buildings Map included in Appendix 2 of the Draft Local Plan. It is noted that the Site is located in an area where there is 'Opportunities for tall building clusters and/or landmarks.' This is strongly supported by our client.</p> <p>Draft Policy LP4 continues, states that tall buildings near the River Thames frontage should strike a careful balance between achieving optimal riverfront views without creating a dense wall of development that blocks visibility from</p>	The suggested changes would weaken the proposed criteria, and therefore are considered inappropriate. As set out in the policy, tall buildings should be appropriately set back to ensure the Thames Path continues to act as a welcoming public route.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>buildings and public spaces behind it. The Draft Policy seeks that, where appropriate, the massing of tall buildings consider their landward facing orientation and step down appropriately to provide a transition towards smaller building types, and that tall buildings are appropriately set back to ensure the Thames Path continues to act like a welcoming public route without heavy overlooking from adjacent riverside residences.</p> <p>Although the key principles of Draft Policy LP4 are strongly encouraged by our client, it is suggested that the policy wording relating to tall buildings near the river frontage is revised to take account of existing site conditions and wider townscape considerations. The Draft Policy should make clear that there are instances where the taller elements of tall building proposals should be located adjacent to the river frontage, particularly where there is a strong townscape rationale for doing so. Additionally, the Draft Policy should recognise that there are instances where tall buildings which are not significantly set back from the Thames Path are acceptable, particularly when taking into account the location and spatial constraints of specific sites.</p>		
Ms Elizabeth Crowther-Hunt				1661	Policy LP4	We have read Richard Norton's letter on behalf of the Deodar- Merivale- Florian Roads Residents Association and support their objections.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.
Katie Brown	Development Planning Manager Network Rail			1736	Policy LP4	<p>See attachments on comment 1734</p> <p><u>Policy LP4 Tall Buildings</u></p> <p>Policy LP4 includes the identification of sites appropriate for tall buildings in line with the Council's Urban Design Study (UDS). This includes 3 sub areas of the UDS Character Area identified as 'Opportunities for tall buildings within town centres and along strategic routes' that incorporate Clapham Junction Station (B5, 5a and 5b) (see Figure 1.1).</p> <p>Within the Clapham Junction and York Road/Winstanley Regeneration Area (Regeneration Area) there a number of sites adjacent and within close proximity to Clapham Junction Station where planning permission has been granted in the last 3 years for developments that include multiple residential and mixed-use towners blocks of between 6 and 24 storeys. These sites are located outside of the 'Character Area' within the area shown in yellow, identified as 'Opportunities for tall buildings within a local context'.</p> <p>Whilst it is recognised that the area immediately surrounding Clapham Junction Station to the south, namely St John's Hill, St John's Road, Lavender Hill and Falcon Road has a number of cherished Victorian and Edwardian buildings, as one of the Europe's busiest rail interchanges and a focal points within the Regeneration Area, it is felt that the area immediately to the south of the station would be a suitable site for buildings of a greater scale to that of recent planning permissions granted to the north of the station to highlight the stations significance. It is therefore suggested that the area to the south of the station should be identified as an 'Opportunity for tall building cluster of landmarks' similar to that identified in area G1a in Wandsworth Town (see Figure 1.2). High density development within this area would consequently enable 'Smart Growth' and support and protect the local retail provision.</p> <p>Designating the area to the south fo Clapham Junction Station as an 'Opportunity for tall buildings cluster or landmarks' would attract well designed high density development focused around a transport interchange which would go some way in meeting the requirements of Policy GG2 Making the best use of land of The London Plan (Publication London Plan) December 2020.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. There is no evidence in the UDS would allow for the designation of areas further to the south of the station as tall building zones.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Network Rail therefore request Policy PM4 and LP4 are altered accordingly to reflect this point and would welcome further dialogue on this matter at the Station Board meetings in relation to the Clapham Junction Enhancement Portfolio.		
Chelsea Cars	Chelsea Cars	Mark Westcott	Associate Director HGH Consulting	1692	Policy LP4	<p><b>See attachment for full context and tables</b></p> <p>Draft policy LP4: Tall Buildings</p> <p>Further consideration of NPPF paragraph 117 (effective use of land) and 122 (achieving appropriate densities) as well as the NLP policies D3 (optimising site capacity) and D9 (tall buildings) are required to ensure that this draft policy is compliant with the regional and national planning narrative.</p> <p>Appendix 2 of the draft Local Plan and the Study identifies the site to be within area G1: Wandsworth Town and Riverside. This area is considered as an area with a 'higher probability of change' due to its existing and proposed designation for development and high PTAL, as indicated by the green and yellow areas on the map at page 8 of the Study.</p> <p>The study also confirms that in area G1: Wandsworth Town and Riverside "tall buildings may be more suited to corner plots to respond to the scale of adjacent junctions, which also includes an active uses and frontages at ground level where appropriate". However, as currently drafted the draft allocation WT1 contradicts this evidence base Study and limits development at this site to 5-storeys.</p> <p>There have been a number of developments in recent years in close proximity to the site that have included tall buildings, namely:</p> <p>Within the wider Wandsworth Town area, there are also a number of other examples, including</p> <p>Noting the acceptability of tall buildings within the recent approval and completion of tall buildings in tables 1 and 2 above, the draft policy LP4 limits opportunities to create tall buildings in appropriate locations and should be reconsidered.</p> <p>The adopted NLP outlines that tall buildings are appropriate in principle, taking account of:</p> <ul style="list-style-type: none"> <li>• The visual, functional, environmental and cumulative impacts of tall buildings;</li> <li>• Their potential contribution to new homes, economic growth and regeneration; and</li> <li>• The public transport connectivity of different locations.</li> </ul> <p>It is this consistency with the contribution to new homes, economic growth and regeneration and the public transport connectivity that draft policy LP4 needs to consider.</p> <p>In considering the development of the site in line with the proposed on-site requirements and uses set out in the draft site allocation, if the development was limited to 5 storeys, it would be difficult to create any articulation of building height and massing within the surrounding and existing street scene. With a limit of 5 storeys, the urban design opportunities are limited, with the inability to create a distinctive, high-quality development in this town centre location.</p> <p>By ensuring consistency with NLP Policy D9 and by enabling the use of tall buildings in appropriate locations, LBW's Local Plan will allow the development of sites to achieve high-quality design and more viable schemes to assist in meeting the wider, overarching objectives of the emerging Local Plan. This</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The site has been identified as a mid-rise zone with opportunities for buildings of up to 5 storeys. There is no evidence in the UDS to suggest that the site has potential for more than 5 storeys.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>flexibility will protect the principles of the Local Plan, whilst allowing sites to be tested on a site-by-site basis during the planning application process.</p> <p>Chelsea Cars seeks the amendment of this draft policy to ensure that it is justified and does not limit the prospect of achievable development of sites, such as site allocation WT1.</p>		
Mr Robert Arguile	Chair The Putney Society			305	Policy LP5	<p>Generally as before and OK</p> <p>LP5.A.3 Much of the borough is terraced in character. Why is this universally forbidden?</p> <p>LP5.A.9 Hardstandings should be resisted where the crossover is effectively privatising street parking. This should be updated to include a complete ban on new crossovers in conservation areas so as to be consistent with transport policy. Permeable paving should be a must.</p> <p>LP5.C Also needs a D. supporting low energy adaptations, external insulation, PV panels and heat pumps.</p>	<p>It is considered that a terrace effect can negatively impact upon the original character of the street.</p> <p>Whilst the importance of protecting the character of conservation areas is not disputed, , planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics. The current wording is considered appropriate.</p> <p>Policy LP3 supports the principle of climate change mitigation alterations and adaption responses within the historic built environment when the development is designed accordance with established conservation best practice.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee  Battersea Society			792	Policy LP5	<p>LP5 Residential Extensions and Alterations</p> <p>The need for alterations to conform to Conservation Area guidelines should be included from the start not just in relation to hard standing. Apart from this, these policies are common-sense.</p>	The supporting text of policy LP3 states that development proposals will be required to demonstrate that consideration has been given to any relevant Conservation Area appraisal.	No change to the Local Plan required as a result of this representation.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1212	Policy LP5	<p><b>Policy LP5 Affordable Housing</b></p> <p>"A. The Council will seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable, having regard to the character and context of individual development proposals and to viability considerations.</p> <p>5. Development that creates 10 or more dwellings (gross) must provide affordable housing on-site in accordance with the threshold approach set out in emerging London Plan Policy H5. The threshold level of affordable housing based on the gross number of new homes to be provided, having had regard to the most up-to-date viability evidence, must equate to at least:</p> <p>6. 35% on individual sites outside of the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB OA);</p> <p>7. 15% on individual sites within the VNEB OA;</p> <p>8. 50% for public sector land on individual sites outside the VNEB OA where there is no portfolio agreement with the Mayor;</p> <p>9. 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.</p> <p>10. The Council will require an affordable housing tenure split of 50% low-cost rent products and 50% intermediate products. The low-cost rent products should be Social Rent or London Affordable Rent. The intermediate products should maximise the provision of London Living Rent and London Shared Ownership units. The Council will consider the provision of other intermediate products (such as Shared Equity, Discounted Market Sale, Intermediate Rent) where it has been demonstrated to the Council's satisfaction that any alternative intermediate products would meet local housing need, having regard to the Council's latest relevant Housing Strategy.</p> <p><i>"We are supportive of mixed and balanced communities however, it is imperative that the quantum and mix of affordable housing is determined on a site by site basis. Consideration should be</i></p>	<p>In accordance with the London, boroughs should determine the remaining 40 per cent of affordable housing tenure split target as low-cost rented homes or intermediate products based on identified need. The identified split should be embedded in the Local Plan rather than considered on a case-by-case basis.</p> <p>Paragraph 17.27 has been revised to align with the approach set out in the London Plan.</p>	Paragraph 17.27 amended to clarify that affordable housing will be measured by habitable rooms.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>awarded to site context, local housing need and viability when determining the appropriate provision. It is noted that the Publication London Plan supports flexibility for tenure mix provided it includes a minimum of 30% Low-Cost Rent and 30% Living Rent or Shared Ownership. This same flexibility should be applied in the Wandsworth Local Plan to maximise affordable housing delivery on appropriate sites. It is also considered that the thresholds set out in this policy should relate to habitable room measures, in accordance with Para 4.5.3 of the Publication London Plan, to incentivise the delivery of larger affordable homes where appropriate.</p>		
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1399	Policy LP5	<p>LP5 Residential Extensions &amp; Alterations Pg 224</p> <p>1. A. 'Proposals for extensions and alterations to existing residential properties will be supported when...</p> <p>A.3 'side extensions would not cause a terrace effect as a result of in-filling the spaces between buildings'</p> <p>SGCARA supports A.3, but expects it to be vigorously enforced in planning decisions. There are a number of planning decisions in our CA where this has not been respected.</p> <p>A.7 '...rear extensions ..... would not be overly dominant, and ensure that a substantial depth of the original rear garden would remain free of buildings and structures including lightwells.</p> <p>SGCARA strongly supports the retention of 'a substantial depth' of the rear garden. The current permission to build on up to 50% of the rear garden length has no justification in this period of Climate Emergency. If an establishment of a specific maximum percentage-loss would give clarity to Applicants &amp; Planners, SGCARA would suggest a 25% maximum for permitted rear-garden loss from the original rear-garden size. The loss of so much garden-space in our generous often 90' rear gardens within our CA has been catastrophic for biodiversity within our CA.</p> <p>A.9 '...hardstandings would be constructed of permeable materials, and would not dominate the appearance of a front garden or cause harm to the character or appearance of the dwelling or the street scene. In conservation areas, hardstandings will be resisted where they would be contrary to the relevant Conservation Area Appraisal Strategies (CAAS) or where they would not be characteristic of the area or would result in harm to the appearance of the street scene'</p> <p>The (complete) paving over of a number of front gardens in our CA appears to have been permitted by the Planning Dept with impunity, &amp; has increased greatly since Parking Controls in our CA. They certainly 'dominate' the front gardens &amp; 'result in harm' to our street-scene. Checks to ensure that hardstandings are actually permeable need to be substantially more rigorous, as in practice, many are not permeable within our CA, &amp; this in turn has a detrimental effect on water-availability for trees &amp; plants &amp; effective drainage. SGCARA supports clear action to halt the paving over of front gardens, which is corrosive of our special CA qualities &amp; contrary to the steps needed to mitigate Climate Change. The word 'resist' doesn't sound strong enough however. Clear powers against paving over more than a certain percentage of front gardens are needed, with the obligation to retain a substantial section of the front boundary along with compensatory front-boundary hedging etc to reduce the negative visual effect of the hard-standing.</p>	<p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The current wording of Parts A.7 and A.9 of the policy is considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Diana McCann	Boroughs Coordinator The Blue			1431	Policy LP5	<p><b>LP5 Residential extensions and alterations – Point 9</b></p>	<p>Policy LP10 requires developments to incorporate Sustainable Drainage Systems (SuDS) or demonstration of alternative sustainable approaches to the management of surface water.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Green Economy					<p>Hardstandings would be constructed of porous and/or permeable materials...</p> <p>Possible Point 10: There should be consideration of rainwater capture and reuse through water butts and possible disconnection of drainpipes through addition of planters and soakaways. Council should provide support including information on how to do this and financial benefits from doing this by reclaiming drainage costs from Thames Water. Also see 14.56.</p>		
Mr Robert Arguile	Chair The Putney Society			307	Policy LP6	<p>LP6.A.3 Digging down an extra 1.2m adds to disruption, makes natural daylighting difficult (required by LP6.A.2) and doesn't actually lead to permeable drainage because the water still has to run to the outside of the basement box. Areas immediately outside buildings are usually terraces or front drives so won't be planted in any case. Limiting the footprint, including for light wells, is more effective. LP6.A.1 needs expanding to say this and refer to front and rear gardens separately.</p>	<p>In accordance with policy LP6, any habitable accommodation must benefit from good levels of natural ventilation and lighting.</p> <p>It is considered that the provision of a minimum of 1 metre of naturally draining permeable soil and 200mm of drainage layer is sufficient to allow for both a reduction in the amount as well as speed of surface water runoff.</p> <p>It is agreed that Part A of the policy should make a direct reference to rear garden land.</p>	Part A.1 of policy LP6 amended to make a direct reference to rear garden land.
Mr Chris Brodie				454	Policy LP6	<p>Para 21.10 states: "All types of green and open spaces including small sections of landscaping and front gardens all provide opportunities for biodiversity which benefit Wandsworth's wildlife." Policy LP5 8 requires gardens to be retained of 2m in depth in conservation areas, yet permits half the garden to be removed to form lightwells to basements outside of conservation areas. If as para 21.10 acknowledges, front gardens contribute to biodiversity, why is it possible to reduce them to a meaningless strip on houses with small front gardens outside of conservation areas –a very common typology in the borough</p> <p>Policy LP5 8 indicates that hardsurfacing in conservation areas will not be permitted where it is out of character, but no such limitation exists in other areas. While the visual aspect might be more significant in conservation areas, the impact on biodiversity is the same irrespective of any designation. The policy also suggests that permeable hard surfacing is likely to be acceptable. However, without greater publicity and education the reasoning for requiring this and ensuring its application hasn't been followed. As well as the visual aspects and impact on biodiversity, there has been recent publicity on the beneficial effects of hedging on air quality. Policies should join up to resist development that loses</p> <p>soft landscaping to the front of house and more should be done to encourage the repair of damage that has been done. Policy LP6 allows up to 50% of rear gardens to be removed in forming basements. How does this, especially when viewed in aggregate, comply with Wandsworth Environmental Sustainability Strategy and specifically effects on biodiversity, urban warming and levels in the water table? The Sustainability Appraisal recommends that a Construction Management Statement should be required for all types of basement developments and that is certainly welcome given the volume of material moved, the disruptive effects of lorry movements, noise during construction and damage to drains and streets. However greater deliberation should be given not only to the environmental effects of the development, but also the carbon footprint of the type and scale of basement development during the course of construction.</p>	<p>A policy that would prevent any basement developments within existing residential areas would not be supported by the Secretary of State and would be considered unreasonable. The London Plan recognises that smaller-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space without the costs of moving house. Policy LP5 therefore seeks to restrict the development of large-scale basement excavations, while seeking to ensure that smaller-scale basement excavations have acceptable impact on biodiversity, flood risk and local character.</p> <p>It is considered that the provision of a minimum of 1 metre of naturally draining permeable soil and 200mm of drainage layer is sufficient to prevent unacceptable impacts on biodiversity.</p> <p>In accordance with policy LP59 (now LP57), all development proposals will be required to contribute to the greening of Wandsworth borough by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Policy LP59 (now LP57) will also be applied to basement developments.</p>	No change to the Local Plan required as a result of this representation.
Mr David Wilson	Senior Town Planner Thames Water			745	Policy LP6	<p><b>LP6 Basements and Subterranean Developments – Sewage flooding</b></p> <p>Thames Water's main concerns with regard to subterranean development are:</p> <p>1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak</p> <p>into the ground resulting in more rainfall in Thames Water's sewerage network when it rains</p>	Agreed.	<p>Additional criterion added to policy LP6 requiring proposals to include a positive pumped device (or equivalent) to mitigate against the risk of sewer flooding.</p> <p>The supporting text of policy LP6 expanded accordingly.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</p> <p>2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.</p> <p>The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.</p>		
Monica Tross	Sectary to planning committee Battersea Society			793	Policy LP6	<p>LP6 Basements and Subterranean</p> <p>Developments Some mention of the need to avoid damage to neighbouring properties should be included together with the need to avoid neighbour nuisance, e.g. noise from lower level extensions, light nuisance from subterranean roof-lights etc</p>	Development proposals for basements will also be assessed against policy LP2 which requires that development proposals do not adversely impact the amenity of existing and future occupiers or that of neighbouring properties.	No change to the Local Plan required as a result of this representation.
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1400	Policy LP6	<p><b>LP6 Basements</b></p> <p>SGCAREA welcomes stricter controls on basement-design, construction, extent &amp; location.</p> <p>Fortunately most dwelling houses in SGARA have not suffered applications for purpose-built basements, but there are occasionally basement-developments where the house is 'built-in' to the hill side e.g. Combemartin Road in our CA. In some cases near the base of the natural slope, the deflection of groundwater by a newly-constructed basement can cause problems e.g. over saturation of the adjoining owner's land. In adjoining dwellings there can also be structural damage caused by the excavation &amp; subsequent installation of a basement.</p> <p>Planning permission for basements ANYWHERE should only be granted following an appropriate survey demonstrating that there will be no adverse effect on adjoining property, including on ground water-flow.</p>	It is considered that the provision of a minimum of 1 metre of naturally draining permeable soil and 200mm of drainage layer is sufficient to allow for both a reduction in the amount as well as speed of surface water runoff. Development proposals for basements will also be required to demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with policy LP 12 (Water and Flooding).	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			308	Policy LP7	Too much of this duplicates LP2 and could be simply cross referenced.  LP7.C The current presumption against back garden development seems to be applied to all gardens. This contradicts para 14.59 and is wrong when there is a need for more homes and these sites are often the only opportunity to build houses. There are plenty of gardens big enough to take development and still leave sufficient garden for the original house.	The restrictive approach to back garden development reflects the direct and indirect value of gardens contributing to local character, providing safe and secure amenity and play space, supporting biodiversity, helping to reduce flood risk and mitigating the effects of climate change including the heat island effect. Whilst it is not disputed that back garden development would increase the borough's housing supply, the Housing and Economic Land Availability Assessment demonstrates that there is sufficient supply of land to meet the housing requirement.	No change to the Local Plan required as a result of this representation.
Monica Tross	Secretary to planning committee Battersea Society			794	Policy LP7	LP7 Small Sites Development LP8 Shopfronts LP9 Advertisements No comment	Comment noted.	No change to the Local Plan required as a result of this representation.
Katie Parsons	Historic Environment Planning Adviser Historic England			873	Policy LP7	<b>Policy LP7: Small Site Developments</b>  <b>Part C</b> – we welcome the presumption against back garden development. This has major benefits for the historic environment, character, and sense of place in addition to having ecological and environmental benefits. Notwithstanding this we have concerns regarding the following sentence: <i>In some cases, a limited scale of back garden development may be considered acceptable if it complies with the requirements set out in Part B above. Development on back garden sites must be more sympathetic in scale and lower than frontage properties</i> - this does not add value given that all back land/infill development would need to comply with part B as it is, while its inclusion undermines the presumption against garden development. We advise that this sentence is omitted.	Although it is agreed that there is scope to strengthen the policy wording, it is not considered that the policy should resist all proposals for additional housing on private residential gardens. Planning policies need to be sufficiently flexible to cater for the local context, so that there are not burdensome barriers in place which will stifle successful schemes. The policy has been revised to limit the exception circumstances to proposals where sites can be assembled to bring forward comprehensive redevelopment. Such schemes increase the possibility of securing higher quality design, as well as a higher proportion of affordable housing units, which is a key priority of the Local Plan.	Policy LP7 revised to limit the exceptional circumstances to proposals where sites can be assembled to bring forward comprehensive redevelopment.
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1401	Policy LP7	<b>LP7 Small Sites Development</b>  A '...the Council will support proposals for infill ... development'  '...there is a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. Back garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained. In some cases a limited scale of backgarden development may be considered acceptable if it complies with the requirements set out in Part B above.'  SGCORA strongly supports no infill via back garden development in our CA OR ELSEWHERE. Every garden is contributing to bio-diversity & we cannot afford any loss in this Climate Emergency. We already have one terrible example of rear 'garden grab' (part of 17 & 19 Sutherland Grove), resulting in a supremely-unsuitable & inappropriate building. Never again.	Comment noted.	No change to the Local Plan required as a result of this representation.
Mr Mark Poulter				142	Policy LP8	Generally good. However A.6. Shutters needs better wording than "avoid". Eg are not permitted unless it can be demonstrated that they are essential in a particular locality.	Comment noted. The current wording is considered appropriate.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			309	Policy LP8	Generally supported  LP8.A.5 Requiring street numbers is welcome. Why doesn't it happen already? Uniformity of fascia height is important for local character.  LP8.A.6 Needs a stronger word than 'avoid'. Shutters seem to be proliferating and the council is doing nothing to stop this.  LP8.D There is no justification for this. All glazed fronts are inappropriate for residential outside designated parades, are usually concealed by internal blinds 'giving the game away', make heat loss difficult to control and risk overheating. Reducing energy use should be the priority.	Support noted.  The current wording of LP8.A.6 is considered appropriate.  The shopfront fenestration should be retained, to avoid negative impacts on the streetscene. Where development proposals create addition units, development proposals will also be required to comply with policy LP10.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr David Curran	Lavender Hill for Me			1165	Policy LP8	<p>LP8 Shopfronts(Local Plan page 226)</p> <ul style="list-style-type: none"> <li>The already-adopted Supplementary Planning Guidance document 'Shopfronts: A guide to good design' is a remarkably old document (dating back to 1988) and at some stage it may merit a minor upgrade to convert it to a newer file format. However it retains its relevance and we support its retention as a key planning guidance document, because it provides a clear, well illustrated and concise basis for developers and planners to agree on what constitutes good and poor design, notably in cases where shopfronts are renewed. IT is good to see that there have been several recent examples where better quality shopfronts have bene installed.</li> </ul> <p>LP8 notes that "Shops that are converted to residential or non-residential uses (including through permitted development) should retain the existing shopfront fenestration and provide natural surveillance of the street." We fully support this proposal, but propose it should also be clarified that an acceptable alternative to retention of fenestration is cases were proposals involve reinstatement of a new fenestration that is more in keeping with the original architecture of the building, while still retaining the appearance of a retail unit. The rationale for this is that we can imagine cases where developers could beneficially replace modern glazing and designs with reinstated "Victorian" shop front designs in such cases, and we would not want to discourage this, provided the designs still maintain a positive outlook to the street.</p>	<p>Comment noted.</p> <p>It is considered that the suggested amendment to Part D of the policy would undermine the intent of this part of the policy.</p>	No change to the Local Plan required as a result of this representation.
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1402	Policy LP8	<p><b><u>LP8 – Shopfronts</u></b></p> <p>Our Southfields shopfronts (&amp; shop-sizes) are important to the character of our shopping centre. If these guidelines are strictly followed, then inappropriate design can be prevented.</p>	Support noted.	No change to the Local Plan required as a result of this representation.
Mr Chris Thomas				35	Policy LP9	<p>These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to the consultation on the above draft Local Plan.</p> <p>The BDGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, PPG and Town and Country Planning (Control of Advertisements)(England) Regulations 2007.</p> <p>The BSGA is generally content that most of Policy LP9 and the supporting text reflect national advice and policy statements. However, we do not consider that the second part of LP9(A)(3) is justifiable (and there is certainly no specific justification for it in the supporting text).</p> <p>The statement that "internally illuminated signs will not normally be permitted within conservation areas or on listed buildings" introduces an immediate presumption that such signs will be unacceptable. Where is the justification for this statement?</p> <p>Modern internally illuminated signs are commonplace, particularly in all types of local and central shopping areas. Modern technology allows them to be of slim construction (LED illumination does not need as much space for head dissipation as older form of lighting). They are commonly fret-cut so that light shows only thought lettering/logos; or individual letters may be face or halo illuminated. We see now reason why these commonly-seen forms of signage should not be acceptable in conservation areas and on listed buildings where they are otherwise acceptable within their specific context. In particular, many conservation areas are thriving commercial centres, where all types of commercial activity and signage is expected. Similarly, many listed buildings in commercial areas have modern shopfronts where modern signage is equally appropriate. The generalisation that internally illuminated sign are (even normally) unwelcome in sensitive areas is totally inappropriate. It is also contrary to the requirements of the Regulations which require every advertisement proposal to be considered on its own merit in the interest of</p>	<p>It is agreed that internally illuminated signs within conservation areas or on listed buildings can be acceptable in exceptional circumstances. It is therefore agreed that the general presumption against such signs should be removed from the wording of the policy. It is considered that additional wording should however be added to the supporting text. This is to emphasise that externally illuminated signs are preferable in all circumstances, particularly where the lighting element is well integrated with the sign.</p>	<p>Policy LP9 revised by removing the general presumption against internally illuminated signs within conservation areas or on listed buildings.</p> <p>The supporting text expanded to emphasise that externally illuminated signs are preferable in all circumstances, particularly where the lighting element is well integrated with the sign.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>amenity and public safety. without any preconceptions of what is "normally" acceptable or otherwise.</p> <p>We therefore suggest that the second sentence of Policy LP9(A)(3) be deleted. Provided a sign (internally illuminated or otherwise) complies with the requirements of the other criteria within the Policy, it must be judged acceptable.</p>		
Mr Robert Arguile	Chair The Putney Society			310	Policy LP9	<p>Supported</p> <p>LP9.A.3 Add 'within or facing CAs'</p> <p>LP9.A.5 Needs strengthening to be clear that digital billboards are not wanted.</p>	<p>Support noted. However, please note that Part A.3 of the policy has been amended to remove the general presumption against internally illuminated signs within conservation areas or on listed buildings. Nevertheless, the supporting text of the policy emphasises that externally illuminated signs are preferable in all circumstances, particularly where the lighting element is well integrated with the sign.</p> <p>The wording of Part A.5 of the policy is considered appropriate. Additional detail can be provided in a Supplementary Planning Document.</p>	No change to the Local Plan required as a result of this representation.
Susie Morrow	Chair Wandsworth Living Streets			669	Policy LP9	<p>LP9 Advertising – this policy needs to be tightened up. Electronic advertising boards are increasingly visually intrusive, in many cases are designed to distract drivers (with obvious implications for road danger) and the designs are intruding over public pavements and carriageways which seems unreasonable given other, sensible planning constraints</p>	<p>Part A.5 of the policy states that new advertisements should avoid causing material harm to public or highway safety. The wording of the policy is therefore considered appropriate.</p>	No change to the Local Plan required as a result of this representation.
Cllr Graeme Henderson and Cllr Rigby	Earlsfield Labour Party			933	Policy LP9	<p>Advertising Hoardings Advertisements</p> <p>LP9 p227</p> <p>The electronic, digital advertising display on the corner of Garratt Lane and Aslett St is completely unsuited to the locality. Aslett St is a residential street and it is not acceptable that this type of display should blight the local area by shining bright lights into people's homes. It is a classic example of the type of display and location that should not be permitted. Residents on streets which will be able to see illuminated advertising should be fully consulted before any illuminated advertising is installed.</p> <p>We would also recommend that this type of change, from a 'poster' site to an electronic display, should not be subject to delegated authority of Officers and should be subject to review by the Planning Applications Committee.</p>	<p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>There is no statutory requirement for publicity for applications for advertisement consent. The exception is cases which, in the opinion of the case officer, result in a material impact on a residential property. For example, an illuminated sign close to and visible from principal rooms in a residential property.</p>	No change to the Local Plan required as a result of this representation.
Dr David Curran	Lavender Hill for Me			1166	Policy LP9	<p>LP9 Advertisements (Local Plan page 227)*</p> <ul style="list-style-type: none"> <li>We believe this makes an assumption that all and any advertisements are beneficial, which we do not believe is backed up by sufficient evidence. We recommend a more balanced approach, which recognises that shopfronts and the like are part of the economic vitality of the district and generally seeks to support reasonable approaches, but which applies a higher threshold to standalone advertisements such as telephone kiosks, large hoardings, animated totem displays, and large poster advertisements on the sides of buildings in terraced parades. The policy is overly crude in treating advertising that is immediately related to the location it is in (such as a shop sign) on a level footing with these forms of completely unrelated freestanding promotional advertising, which can often have a detrimental impact on the town centre, and which our diligent planning officers have to date had good success in reducing.</li> <li>There have been ongoing issues with advertising hoardings masquerading as 'payphones' to sidestep the consenting process and aggressively promoted planning proposals for large advertisements on Wandsworth pavements which detract from the street scene even outside of conservation areas, which are often poorly maintained, which reduce sightlines for pedestrians and CCTV, and where poor placement means they can cause accessibility issues and generate antisocial behaviour including</li> </ul>	<p>Part A.3 of the policy requires new advertisements to respect local context, including in relation to listed buildings and conservation areas.</p> <p>In accordance with the NPPF, advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts. There is therefore no scope to resist advertisements which have a neutral effect on the public realm, because such policy position would not conform to the national legislation.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>crime and flytipping. The guidance is maybe overly positive with regards to advertisements in general, which may inadvertently pave the way to undesirable proposals such as these.</p> <ul style="list-style-type: none"> <li>• Large hoardings on older Victorian properties are also problematic in that they have a significant detrimental impact on the attractiveness of town centres and residential areas; we propose they should not be supported unless they can clearly demonstrate that they are in keeping with the Where properties hosting such advertisements are part of proposed developments, advertisements should be removed as part of the developments wherever practicable. There have been several cases where this has been successfully negotiated as part of development proposals.</li> </ul> <p>In all cases, we propose that advertisements should demonstrate how they will enhance the public realm, rather than starting start from an assumption that they are essential. Advertisements should be in keeping with the properties in their vicinity(as is proposed –maybe going rather further than simply 'having regard 'to the buildings that they are immediately fixed on), and should avoid being placed on the public highway.</p>		

## Chapter 15 - Tackling Climate Change

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Robert Arguile	Chair The Putney Society			312	General Tackling Climate Change Comment	See also comments above about the climate impact of policies LP2,3, 5, 6 & 8.	Comment noted.	No changes to the Local Plan are considered necessary
Monica Tross	Sectary to planning committee Battersea Society			795	General Tackling Climate Change Comment	<p>15 TACKLING CLIMATE CHANGE</p> <p>The environmental objectives and aspirations outlined in the supporting text are in keeping with Wandsworth's stated ambition to become the greenest borough in inner London but the policies themselves sometimes fall short of these aspirations:</p> <ul style="list-style-type: none"> <li>Carbon pricing. Although the offset price per ton has been increased from £60 to £95, which is an improvement, this could go further. Lewisham currently has a price per ton of £104.</li> <li>Carbon offset payments: Wandsworth's record of collection of carbon offset payments is comparatively poor; to date £2,290,000 has been secured and £22,300 has been collected while other boroughs have secured much greater amounts (Croydon, £8,000,000 secured £450,000 collected; City of London £3,000,000 secured £238,000 collected). More robust requirements for collection, such as requiring payments at commencement of on-site works as it is in Islington, rather than prior to first occupation, would go a long way towards enabling more proactive use of the carbon offset fund. Information on prioritisation of offsetting project types seems to be missing</li> </ul> <p>Some policies are framed too much as possibilities or options rather than specific commitments.</p>	The Council is committed to tackling climate change and becoming the greenest borough in inner-London. As set out within the Draft Local Plan the Council has a road map which details the actions that will be required to reach the ambitious targets of 2030 and 2050. LP15 sets out that the aim is to reduce carbon emissions on site and it is only in exceptional circumstances that carbon offsetting would be considered. It is preferable to have policies and implement design at an earliest stage to incorporate measures to improve energy conservation and efficiency, as well as contributions to renewable and low carbon energy generation. As development schemes evolve there are often variations to the application and which case updating the offset amount may have to occur. It is therefore preferable to wait until occupation to ensure the correct amount is captured. The amount which has been set for carbon offset payments and was based on the London Plan viability assessment which evidenced that most development types can meet the policy requirements. This figure will be reviewed as part of the AMR and if necessary can be updated independently of the Local Plan review.	No changes to the Local Plan are considered necessary
Spencer Barnshaw	Secretary Battersea and Wandsworth Trades Union Council			1148	General Tackling Climate Change Comment	<p>Chapter 15 'Tackling Climate Change' and Chapter 18 'Building a strong economy'</p> <p>The plan represents an opportunity to build back better from the pandemic. For this to happen requires a bold proactive strategy that delivers on jobs and climate. Some progress is reflected in the plan, but it falls short on what is needed to deal with the scale of the challenges of the next decade. The plan cross references the WESS Update 2021 which has a new section on the Green Economy:</p> <p>Para 62 - Action around supporting and promoting the green economy have been added into the action plan, including establishing what green jobs exist currently in the borough, forecasting what future demand will be and seek funding to support the development of green jobs. The Council will work with local providers, including South Thames College, to develop new courses that provide the skills needed for local residents to thrive in the developing green economy</p> <p>Para 63 - Further actions around the green economy include working with key businesses and groups in the borough, including the Chamber of Commerce, to share information and practical guidance on how local businesses can take advantage of the opportunities of the green economy and showcasing green local businesses through a green awards category in the annual Chamber of Commerce business awards.</p> <p>Further details are contained in Appendix A – WESS Action Plan 2020 Progress Report</p>	Comment noted. The Council is working towards an ambitious target to be zero carbon by 2050 and has set out its road map to achieve this through the Wandsworth Environmental Strategy.	No changes to the Local Plan are considered necessary



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Appendix B – WESS Action Plan 2021</p> <p>Part 1 – Getting our own house in order (Actions 1-44)</p> <p>Part 2 – Reducing the borough's emissions (Actions 45-171)</p>		
Dr Rosena Allin-Khan				1203	General Tackling Climate Change Comment	<p>(v) Climate Change:</p> <p>On the housing proposals within the plan, I believe that they should be, at the very least, carbon neutral. Failing that, a very high proportion of energy used in the new homes should be from renewable sources. All developments should involve discussions with the developer to reach as high a level of sustainability as possible.</p> <p>I also propose that policy LP10 Responding to the Climate Crisis is strengthened by asking at Paragraph A for whole life carbon assessments for all major schemes. This is a London Plan requirement in respect of referable development and recognises that to properly understand the carbon impact of development, we need to take account of the entire development phase including demolition and materials used.</p> <p>I also ask that consideration be given to the production of a Supplementary Planning Document providing detailed guidance on sustainable construction.</p>	<p>Comment noted. LP10 requires developments to achieve high standards of sustainable design and is working towards a zero-carbon target by 2050. Further wording is required to reflect the Circular economy and whole life cycle carbon assessments which will be added to LP10. The Council will consider the need for SPD's as the plan progresses through to examination.</p>	<p>Wording has been added to LP10 to reflect the comment and refer to Whole Life cycle Carbon assessments and circular economy.</p>
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1324	General Tackling Climate Change Comment	<p>15 Tackling Climate Change We would like to make the following suggestions: - The plan needs to include more details on how current housing stock can be improved to meet environmental standards.</p>	<p>Throughout the Draft Plan it has been cross referred to the WESS. The WESS aims to deliver a range of projects to tackle existing housing stock. Delivery of Green Homes Grant Local Authority Delivery Scheme will continue, and bids will be developed for any future funding that becomes available to help make residents' homes more energy efficient and generate their own renewable electricity and/or heat. The Council will commission a stock condition survey to provide accurate baseline data on the condition of housing stock and identify potential opportunities for energy efficiency improvements to help tackle fuel poverty. The Social Housing Technical Assistance pilot will provide the (WESS) Action Plan Update with a full assessment of its 16,000 tenanted housing stock and a plan to improve the energy efficiency of this to EPC C plus a pathway to net zero. The Council will improve the energy efficiency of council housing stock and estates by moving to LED lighting where appropriate,</p>	<p>No changes to the Local Plan are considered necessary</p>
Terence Brown	Coordinator Wandsworth Friends of the Earth			1563	General Tackling Climate Change Comment	<p><b>Overview:</b></p> <p>The Wandsworth Friends of the Earth group is the local manifestation of the National Friends of the Earth organisation and focuses on environmental issues in Wandsworth. Because we have limited resources, we have only commented on the two sections of the local plan considered most relevant to our areas of concern.</p> <p>It is acknowledged that the local plan is the policy document drawn up by Wandsworth Borough Council with respect to their responsibilities under the Town and Country Planning Acts. It essentially sets out how the local authority will view and respond to development proposals that may be put forward by private developers or public bodies. It can essentially only be used where new development is anticipated either through physical change or change of use.</p> <p>Our comments are restricted to our principal areas of concern for the environment in the light of the Council's declaration of a 'climate and ecological crisis' in July 2019. We are commenting on:</p> <p>Section 15: Tackling Climate Change</p> <p>Section 21 Green and Blue Infrastructure and the Natural Environment</p>	<p>The Council is committed to ensuring its ambitious climate change targets are delivered through the plan. However, in certain circumstances it is not always viable for a development to achieve the targets and in those circumstances the policy needs to allow some flexibility. The numbering and annotation of sections within the Local Plan will be reviewed.</p>	<p>Review the annotation of the Local Plan.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>It is possible that a comment we make on some aspect of these two sections might pick up a point dealt with in other sections of the Local Plan. Apologies if this is the case.</p> <p>In terms of direct control of other aspects of the local authority's own activities and jurisdiction over citizens and businesses private activities that do not fall within the remit of Town Planning law, we look to the Wandsworth Environmental and Sustainability Strategy (WESS) to embody improvements to mitigate climate change and obviate damage to the local ecology. However, we do see the Local Plan as a significant tool for implementing strong ecological support and climate change mitigation policies in support of the WESS.</p> <p>15.1</p> <p><b>General Comments:</b></p> <p>Ecological support &amp; enhancement and climate change mitigation provisions should take precedence over development opportunity and 'technical' difficulties in meeting these criteria should not include 'viability'. Ecological and Climate change Mitigation provisions should be first requirements for testing validity of proposed 'sustainable development' and should not be regarded as subject to avoidance or 'trading' with other Council requirements or ambitions.</p> <p>The annotation of sections, paragraphs and clauses throughout the document is confusing and makes reference difficult. It uses alphabetical (both upper and lower case), numerical, alpha-numerical and non identified section headings. A simpler hierarchy would make the document much more easily read and understood.</p> <p>The policies and ambitions set out in the two sections we have commented on below are generally to be welcomed. Our comments focus generally on the strength of clauses in sustaining climate and ecological requirements.</p> <p>While we welcome many of the provisions of the sections we have studied, more specific comments are set out below</p> <p><b>Section 15: Tackling Climate Change</b></p> <p><b>Preamble to LP10:</b></p> <p><b>P15.1:</b> The opening paragraph uses/emphasises market-based language ". . . identifying opportunities for growth. . .", which sets the tone of the Council's (and indeed our present Government's) approach to environmental issues as set out in the Local Plan. Bearing in mind the Climate Emergency declared in 2019 (P15 2) the tone is not one of necessity in the face of emergency, but rather one of trade and compromise.</p>		
Isabella Jack	Sustainable Development Advisor Natural England			1613	General Tackling Climate Change Comment	<p><b>See attachment on comment 1608 for context and appendices</b></p> <p>1. Climate change adaptation</p> <p>We welcome consideration of climate change, as outlined in Section 15 of the Local Plan and that Wandsworth Borough declared a climate change emergency in 2019. We note that the Local Plan also considers the merits of green and blue infrastructure in climate change adaptation, and we are pleased to see the consideration of the natural environment in tackling climate change. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected.</p>	Comment noted. The links provided are useful and will be utilised for internal purposes on guidance to climate change adaptation.	Improve explanation and sign-posting to what the council is doing to reduce waste and increase recycling.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						A list of useful links on consideration of climate change adaptation is provided at Annex B		
Mr Robert Arguile	Chair The Putney Society			311	15.2	<p>The targets in 15.2 will impact on all development decisions. All consents for adaptation, upward extension and change of use should be subject to conditions requiring zero carbon upgrades because now is the last chance in many cases to get work done to these buildings before 2030. Design policy needs to recognise that in most cases serious upgrading of energy efficiency cannot be done without affecting the appearance of buildings. See our comment on LP1.A.6.</p> <p>If the plan is to have any environmental credibility it must at least set a target for the end of the</p> <p>(15 year) plan. As well as 2050. If this was a serious proposal there would be interim targets for each administration between now and 2030 (carbon neutral) and 2050 (zero carbon).</p>	The Council is committed to tackling climate change and becoming the greenest borough in inner-London. As set out within the Draft Local Plan the Council has a road map which details the actions that will be required to reach the ambitious targets of 2030 and 2050. The WESS will play a key role in delivering these actions along with the Local Plan. The aim is for zero carbon by 2030 and having an interim target may confuse and also in some cases not push developers to achieve higher standards if an interim target exists. Whilst the Local Plan is set out for 15 years it is also reviewed every 5 years. In addition the Local Plan includes monitoring indicators which are reviewed every year to see the performance of the plan.	No changes to the Local Plan are considered necessary
Mrs Ruth Marie Pates				4	15.3	Applaud the ambition, but I question whether Wandsworth is facing up to the scale of the challenge. The borough needs to quantify the size of changes required and have policies to match. Currently very timid actions that will make very little difference to carbon emissions. Housing insulation and transport have huge potential.	Comment noted. The Council is committed to ensuring the targets of net zero carbon are achieved. LP 10 sets out the approach to ensure that development proposals comply with the policies set out in the local development plan, the approach to energy supply on development sites should be clearly set out in an energy assessment, which shows how various options have been considered and includes the provision of sufficient and robust detail to demonstrate an achievable energy strategy.	No changes to the Local Plan are considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1564	15.3	<b>P15 3:</b> The sentiments expressed in this paragraph are welcomed and the cross-referencing to the WESS is appropriate. The impact of these ambitions can only be evaluated in the light of the strength of the measures included in the Local Plan policies and the commitments made in the WESS.	Comment noted	No changes considered necessary to the Draft Local Plan
Caroline Hartnell				163	15.6	We shouldn't be talking about making developments 'more sustainable': developers should be compelled to make all new buildings fully sustainable.	Comment noted. The Council is committed to achieving high standards of sustainable design and construction in order to achieve it's ambition of becoming zero carbon by 2050. It is not currently always viable for developments to be fully sustainable but as technology advances this will improve standards.	No changes to the Local Plan are considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1566	15.6	<p>Following the policies there is further discussion of their application and meaning in subsequent paragraphs 15.5 to 15.23. Some comments:</p> <p>15.6 is grammatically incorrect: 'There are a wide range' should read 'There is a wide range. . .'</p>	Comment noted. Change wording at 15.6 to ensure it is grammatically correct.	Change wording at 15.6 to correct the grammar.
Caroline Hartnell				164	15.7	Again, we shouldn't be talking about developers being 'encouraged' to adopt higher standards; they should be required to do so.	Comment noted. The Council is committed to achieving high standards of sustainable design and construction in order to achieve it's ambition of becoming zero carbon by 2050. It is not always feasible to apply standards and will depend on each application.	No changes to the Local Plan are considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1568	15.7	15.7 Uses the term 'Where feasible, developers are encouraged. . .'. Feasibility, presumable as distinct from viability? Regarding BREEM, this paragraph reduces the Policy 'requirement' of LP10 B from a requirement to an 'expectation'. Is this intended as a softener?	<p>Agreed further clarity required over feasibility and viability. Further wording added to the background text regarding viability. The use of the word 'expectation' has not been used as a softener. As mentioned in the policy it is required but there may be instances where this is not workable. In order to ensure this intention is reflected wording will be changed</p> <p>The use of the word 'expectation' has not been used as a softener. As mentioned in the policy it is required but there may be instances where this is not workable. In order to ensure this intention is reflected wording will be changed.</p>	Changed wording to reflect that LP10B is a requirement but there may be instances where this is not viable.
Dr Samuel Clifford				567	15.8	Will WBC implement a process whereby rental tenants can request changes be made by their landlords to reduce excessive energy and water consumption?	This is not a planning policy function. Water meters are a useful tool for measuring water consumption. The Water Industry Act 1999 s11 states that tenancy agreements cannot be used to stop tenants who pay their own water bills from choosing a meter.	No changes to the Local Plan are considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			314	15.8	Which 'energy generating technologies'? Demand reduction (insulation) should always be first, then renewables, then efficient heat. Solar panels have to face south, even if that is the front.	As mentioned in the text at 15.8 'There may be opportunities to improve the energy efficiency of existing heritage buildings through measures such as improved insulation and draught-proofing' The energy generating technologies that can assist with this should be considered. As the opportunities will be different for each building it is important to not be overly prescriptive.	No changes to the Local Plan are considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1569	15.8	<b>Reducing Carbon Dioxide Emissions</b>  Paragraphs 15.10 to 15.15 give a useful interpretation of the requirements for 'zero-carbon' as expressed in the London Plan (see definitions above), though it is hard to understand the significance of a 35% reduction on the TER as expressed in Approved Document L and how it equates to zero-carbon or even net zero-carbon. For the normal understanding of the word 'zero' the emissions would be zero. This needs to be cleared up.	Agreed.	Changed wording within background text of LP10 to clarify terminology of zero carbon
Caroline Hartnell				166	15.10	The latest science shows that 2050 is far too late. We should be aiming for zero carbon by 2030.	Comment noted. In May 2019, the Committee on Climate Change (CCC), a non-departmental public body that advises the government on the climate, recommended that the UK should aim to be net zero on all greenhouse gases by 2050. This would keep the UK in line with the commitments it made as part of the 2016 Paris Agreement to keep global warming under 2 degrees. The CCC has said that getting to net zero (i.e. meeting the 100% target) is "technically feasible but highly challenging".] Doing so will require sustained policy interventions across several sectors. The Draft Local Plan has also set these ambitious targets for zero carbon by 2050. An earlier date would not be realistic and as such the draft Local Plan has set a target of carbon neutral by 2030.	No changes to the Local Plan are considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1570	15.10	<b>Reducing Carbon Dioxide Emissions</b>  Paragraphs 15.10 to 15.15 give a useful interpretation of the requirements for 'zero-carbon' as expressed in the London Plan (see definitions above), though it is hard to understand the significance of a 35% reduction on the TER as expressed in Approved Document L and how it equates to zero-carbon or even net zero-carbon. For the normal understanding of the word 'zero' the emissions would be zero. This needs to be cleared up.	Agreed	Changed wording within background text of LP10 to clarify terminology of zero carbon
Caroline Hartnell				168	15.13	35% reduction on-site is not enough. It's possible to make buildings zero carbon. Carbon offsetting shouldn't be used as an alternative to this.	Comment noted. The 35% target is reflective of the targets set out in the ambitious climate change policies within the London Plan and actually goes further. The 35% reduction is over and above Part L of the building regulations. The Draft Local Plan sets out that carbon off setting should only be used in exceptional circumstances and where this can be proved through an Energy Statement. Offset funds have the potential to unlock carbon savings from the existing building stock through energy efficiency programmes and by installing renewable technologies – typically more expensive to deliver due to the building age, type and tenure.	No changes to the Local Plan are considered necessary
Councillor Graham Loveland	Labour Group			644	15.14	We note that para 15.14 references a carbon offset rate£95 per tonne. We are aware that other boroughs levy a higher rate and ask that raising the rate to £104 be considered.	The Council has increased the carbon offset rate from £60 to £95 per tonne in July 2020. This increased price has been viability tested by the GLA. A Whole Plan Viability Assessment was carried out on the London Plan to test the cumulative viability impact of proposed policies and standards. This assessment is supported by scenario modelling of policy requirements that are considered to impact on development viability. The underlying message of the London Plan's Viability Assessment is that most development types can meet the policy requirements of the emerging London Plan. The £95 per tonne price is underpinned by a detailed Carbon Offset Price Study undertaken by AECOM in 2017, which based the price of carbon for offset on non-traded prices for carbon. The change to Wandsworth's carbon offset price therefore has underpinning viability evidence.	No changes to the Local Plan are considered necessary
Caroline Hartnell				173	15.15	There shouldn't be a trade-off between affordable housing and low-carbon standards. Both must be achievable. Developers' profit expectations must be lower, or council subsidies involved to achieve this.	Comment noted. The carbon offset fund will be subject to review.	Wording within text has been removed as a result of the comment. Further wording has been added to LP22 to detail that

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
								where viability is an issue affordable housing will be prioritised.
Lois Davis	Co-ordinator Wandsworth Green Party			458	15.15	It is regrettable that 15.15 states "Where development viability is a concern, affordable housing will be prioritised over zero carbon contributions. We find this to be a very short-sighted approach which could lead to higher retrofit costs later in order to meet national targets.	The carbon off set price and contributions hierarchy will be kept under review and updated where necessary. BREEAM standards can have an impact on affordable housing and in line with the London Plan the Council will priorities affordable housing where viability is an issue.	Wording removed as a result of comments. Wording within text has been removed as a result of the comment. Further wording has been added to LP22 to detail that where viability is an issue affordable housing will be prioritised.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1571	15.18	<b>Compliance and Monitoring</b>  15.18 What would be the criterion (i.e. the size and/or form of development) for imposing the condition requiring a Section 106 agreement to fund energy monitoring over a four-year period?	The s106 agreement will be dependent on each scheme and the Council's Sustainability Consultants will advise on the requirements and contributions should they be required	No changes considered necessary to the Draft Local Plan
Terence Brown	Coordinator Wandsworth Friends of the Earth			1572	15.19	<b>Climate Change Adaptation</b>  15.19 Typographical error, line 8 'floor' = 'flood' (?)	Comment noted. Change wording to reflect comment.	Updated typographical error at 15.19
Caroline Hartnell				176	15.20	The council should offer individual advice to all home owners on how best to reduce carbon emissions in their homes, ie visiting their homes and offering advice for that particular building. Many people are held back from taking carbon reduction measures because they don't know where to begin.	Comment noted. Not a planning issue. Comment passed to Policy and review team who lead on the Wandsworth Environmental Strategy	No changes to the Local Plan are considered necessary
Caroline Hartnell				181	15.21	We need to create more shade. This could start with a commitment from the Council to cut down no mature trees unless they present an actual danger to the public which can't be mitigated by pruning and maintenance. The cutting down of mature chestnut trees on Tooting Common has seriously reduced the quality of experience of being on that part of the common in summer. As well as preserving what we have, the Council must adopt an active policy to plant more street trees and other trees and create more green spaces.  Refusing planning permission for paving over front gardens and creating dropped pavements so cars can park in front gardens would be another good measure.	LP58 Tree management and landscaping sets out the council's intention to require the retention and protection of existing trees, including veteran trees. It also sets out the requirement where appropriate for developments to incorporate new trees and other vegetation which deliver environmental and biodiversity benefits. The General Permitted Development Order allows for non-permeable surfaces up to a 5m2 threshold (apart from Article 4 conservation areas where they disapply the GDPO.) Therefore a policy approach on this would not be effective.	No changes to the Local Plan are considered necessary
Caroline Hartnell				188	15.29	Inclusion of areas of earth or grass, rather than hard areas, should be an essential part of all development to allow water to soak away rather than run off to cause flooding.	The General Permitted Development Order allows for non-permeable surfaces up to a 5m2 threshold so in the main (apart from Article 4 conservation areas where they disapply the GDPO. Therefore a policy approach on this would not be effective.	No changes to the Local Plan are considered necessary
Rachel Holmes	Planning Advisor Environment Agency			1616	15.51	See attachments on 1615 for more detail  Riverside Strategy approach  There are significant opportunities to enhance your riverside environment both where defences need to be raised, but also where they are to be repaired or replaced. Whilst just raising the defences on the existing footprint (which in itself could prove both difficult and significantly more expensive) would achieve the flood risk management objectives of the Plan, it would not provide any wider landscape or environmental benefits, and could introduce structures that would be tall, unattractive and would restrict public access and views of the estuary. However, if planned for, there is the potential to achieve significant public realm and environmental improvements when undertaking flood defence work, including improved public spaces by the riverside, improved access to the river and an enhanced Thames Path, and the potential creation of new intertidal habitats.  Recommended action: we strongly recommend encouraging the Riverside Strategy approach within the Local Plan.	Comment agreed.	The wording of the policy and supporting text has been amended in response to the comment raised.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>General amendment</p> <p>The supporting text on Page 249, Part 15.51 should be amended to incorporate reference to the riverside strategy approach: 'Developments should also take into account the requirements of the Thames Estuary 2100 (TE2100) Plan and it's riverside strategy approach with regard to the implementation of current and future improvements to the River Thames tidal flood defences in order to effectively manage tidal flood risk over the plan period'. Recommended action: amend wording to include riverside strategy approach.</p>		
Caroline Hartnell				192	15.54	<p>Incineration of food waste - 43% of waste that is incinerated in Wandsworth - is not compatible with becoming a circular economy. Composting would make best use of the food waste and avoid high levels of carbon emissions caused by incineration.</p>	<p>Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030. Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.</p> <p>Cory recently received planning permission for a new Riverside Energy Park which includes a new AD facility which Wandsworth would have the option of sending separately collected food waste to via river barge. A trial weekly food waste collective service for low-rise properties is planned prior to commencement of a new waste collection contract in April 2024 to help inform scoping decisions for that contract.</p>	<p>Comment noted. Improved explanation and sign-posting to what the council is doing to reduce waste and increase recycling.</p>
Mr Robert Arguile	Chair The Putney Society			319	15.54	<p>We support development of the circular economy.</p>	<p>Support welcomed.</p>	<p>No changes to the Local Plan are considered necessary</p>
	Western Riverside Waste Authority (WRWA)	Mr Christopher Collett	Carter Jonas LLP	1077	15.55	<p>See attachments on comment 1071 for full context</p> <p>Page 251 – Suggested Correction: 15.55 Wandsworth is one of four London boroughs (along with <u>Wandsworth-Lambeth</u>, Hammersmith &amp; Fulham and Kensington &amp; Chelsea) for which the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household <u>Local Authority Collected W</u>aste. A thirty year Waste Management Service Agreement (WMSA) was established between WRWA and Cory Environmental Ltd to dispose of WRWA waste, which ends in 2032.</p>	<p>Suggested corrections noted.</p>	<p>Corrections made.</p>
Caroline Hartnell				194	15.57	<p>At present, despite its aim to become London's greenest borough, Wandsworth ranks 341 out of 345 among local councils for recycling. <a href="https://www.letsrecycle.com/councils/league-tables/2018-19-overall-performance">https://www.letsrecycle.com/councils/league-tables/2018-19-overall-performance</a> This is a shameful position.</p>	<p>Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helpig to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.</p>	<p>Comment noted. Improved explanation and sign-posting to what the council is doing to reduce waste and increase recycling.</p>
Caroline Hartnell				197	15.71	<p>Four out of ten air pollution hotspots in London are in Wandsworth - a disgraceful figure. Addressing this must be a priority. Immediate abandonment of LTNs across the borough demonstrates lack of seriousness in addressing the issue. The Council should call a citizens assembly to work out how this issue can be addressed as a matter of urgency in a way that has buy-in from Wandsworth residents.</p>	<p>Wandsworth Council will strive to improve air quality across the borough, especially at those hotspots of poor air quality that are above WHO limits. The causes of air pollution at these locations are not under the Councils direct control, and the potential solutions are not either. Whilst the council is unable to implement restrictions on roads under the control of TfL, we do work with businesses in the borough to improve air quality and promote cleaner deliveries and sustainable transport, including through our Clean Air Village projects and with local Business Improvement Districts, support residents in modal shift and have introduced restrictions on road use. The introduction of the Ultra Low Emissions Zone in October 2021 inside the South Circular will help reduce vehicle emissions at hotspots locations in the borough that are inside the ULEZ boundary. The Council is finishing the development of a new Air Quality Action Plan, which will set out what the Council will be doing to improve the air quality within our borough. This plan will be published and open to consultation from July 2021.</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							The Council not be calling a Citizens Assembly on air pollution by June 2021. Citizens Assemblies cost upwards of £60 00 to hold and take months of planning and officer time to execute properly. As a substantial amount of work has already taken place to develop the Air Quality Action Plan and we already have plans to consult and engage on air quality we do not believe this would be a good use of public resource.	
Mr Robert Arguile	Chair The Putney Society			321	15.80	This paragraph needs to include the effect on nature and unlit commons	Comment noted. Agreed, the impact of artificial lighting does not just affect people and wording will be added to reflect the impact on the natural environment.	Change to paragraph 15.80 to include the impact of artificial lighting on the natural environment.
Susie Morrow	Chair Wandsworth Living Streets			670	15.86	Construction Logistics Plan – we would like to see a standard construction logistics plan for all developments that specifically addresses road danger (particularly to people walking and cycling), sets expectations and targets for developers and contractors that ensures pavement space, safe crossings and cycling is protected, and specifies very clear routes to/from sites across the Borough. This may require setting minimum standards for banksmen/women based on scheme size.	Paragraph 15.86 is considered sufficiently thorough and flexible.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			316	Map 15.1	How is it realistic to connect up Putney High Street? All of the south side of the Upper Richmond Road has only recently been redeveloped. The High Street will only see piecemeal change.  Is the Council, as principal landowner, committing to install a network in Roehampton?	Comment noted. The Draft Local Plan policy LP11 Energy Infrastructure sets out that new development will be expected to connect to a decentralised energy network, where they do not exist then the developments should make provision to connect to any future network that may be developed. Therefore, any new developments within Putney High Street should make provision for a connection and when an opportunity arises they can then connect to a DEN. As part of the application for the Alton Roehampton estate included an energy strategy that proposes to develop a low carbon, electrically-led heat network for the site. Air source heat pumps will provide the majority of the annual total heat generation. Ultra-low NOx gas boilers (with reduced nitrogen oxide and nitrogen dioxide emissions) will assist in providing heat during periods of high demand. A new plant and equipment enclosure will be provided on the roof of Block N of the site	No changes to the Local Plan are considered necessary
Alan Pates				29	Policy LP10	15.8. As noted above this section needs to treat this issue as a crisis and go so much further.	Comment noted. The Council is committed to ensuring the targets of net zero carbon are achieved. LP 10 sets out the approach to ensure that development proposals comply with the policies set out in the local development plan, the approach to energy supply on development sites should be clearly set out in an energy assessment, which shows how various options have been considered and includes the provision of sufficient and robust detail to demonstrate an achievable energy strategy.	No changes to the Local Plan are considered necessary
Caroline Hartnell				162	Policy LP10	All new buildings in Wandsworth should be zero carbon, with immediate effect. We have no time to waste.	Comment noted. The Council is committed to ensuring it's ambitious climate change targets are delivered through the plan. To reach these targets the Council has developed a detailed roadmap outlining actions that it will take to tackle climate change within the borough - the Wandsworth Environmental and Sustainability Strategy. As set out in LP10 Tackling Climate Change 'All major developments (residential and non-residential) should achieve zero carbon standards, as set out in the London Plan',	No changes to the Local Plan are considered necessary
Dr Samuel Clifford				566	Policy LP10	If WBC wants to use building design as a means to achieve a reduction in carbon, all new developments must come with adequate cycle parking provision and minimal parking (with priority given to blue badge holders).	LP53, Parking, servicing and car free development policy sets out that in order for Wandsworth to promote sustainable transport the amount of parking and servicing should be as efficient and lean as possible. The provision of cycle parking is a crucial factor in encouraging more sustainable travel to and from developments which has been recognised within the policy ambitions.	No changes to the Local Plan are considered necessary
Mr Robert Arguile	Chair The Putney Society			313	Policy LP10	LP10.A.2 & 3. Retaining all or substantially all of the existing building and its embodied carbon should be the first requirement.  LP10.B.3 This needs an EPC level target too.  LP10.C Change of use (which includes extra dwellings) triggers a need to comply with Building Regulations even when the change is Permitted Development. Applicants for certificates of Lawfulness as well as for full Planning Consent must be reminded in decision notices. Meeting Zero carbon	Agreed, wording to reflect whole life cycle assessments and embodied carbon to be added to the policy. Comment LP10.c this is an issue which will be part of the planning application process. Within LP10 the word 'encourage' has been used as it will often be dependent on the scheme if the requirements are practicable. Comment LP10.D - the Local Plan approach is in line with the newly adopted London Plan policy on carbon dioxide emissions	Wording added to LP10 to reflect comment on WLC.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>as far as practicable should be a requirement. Note 'promote and encourage' can be side stepped.</p> <p>LP10.D Revisions to Part L of the Building Regulations now out to consultation will exceed these requirements. This wording will be out of date before the plan is adopted, and is in any case not sufficient to meet Zero carbon aspirations.</p> <p>LP10.D.3 'Fabric first' must be given higher priority. These elements last a lot longer than the plant.</p> <p>LP10.H 'Retrofitting of existing buildings, through low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported.' Supported.</p> <p>Other policies e.g. LP2 need to recognise that this often means changes to external appearance.</p>		
Lois Davis	Co-ordinator Wandsworth Green Party			457	Policy LP10	Chapter 2 outlines the intention to "Review poorly performing buildings, including those in the ownership of the Council and other public bodies, and improve them through retrofitting where this is possible [emphasis added]." Improved collection of carbon offset payments would increase this possibility and reinforce the commendable commitment in LP10 H that "Retrofitting of existing buildings, through low-carbon measures, to adapt to the likely effects of climate change should be maximised and will be supported."	Supportive comments noted	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			451	Policy LP10	We were concerned by the lack of rigour in applying sustainable construction procedures such as the Building Research Establishment Environmental Assessment Method (BREEAM). For example, (LP10 B 1) while the requirement to meet BREEAM "Outstanding" standard is most welcome the caveat "unless it can be demonstrated that this would not be technically feasible" is entirely inappropriate because BREEAM, which is a nationally accepted procedure that is objective, measurable and industry recognised is composed of technically feasible requirements.	Comment noted. Whilst BREEAM is a nationally accepted procedure this is a uniform approach which for some schemes unfortunately is not always viable due to building constraints and achieving all the elements of BREEAM to achieve 'outstanding' status. Therefore, in certain circumstances where there is evidence to show this then some elements of the BREEAM may not be required.	No changes to the Local Plan are considered necessary
Mr Angus Robertson	member Alton Action			563	Policy LP10	<p>Comment on Adapting to Climate Change, H:</p> <p>We fully support the maximum use of the retrofitting of existing buildings. However, the possibility of retrofitting has not been explored and evaluated in the context of the potential regeneration of the Alton Estate.135</p>	Comment noted. To allow the increase in affordable housing units, improved open space, new multi purpose community building, improved community hub, replacement GP surgery and community space, new retail and business space, food stores and modern offices it would not be possible to retro fit the existing building and provide such uses.	No changes to the Local Plan are considered necessary
Mr David Wilson	Senior Town Planner Thames Water			743	Policy LP10	<p><b><u>Responding to the Climate Emergency and Taking Action</u></b></p> <p><b>Water Efficiency/Climate Change</b></p> <p>The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a></p>	Supportive comments noted. Wording added to background text as a result of comments. It is agreed that planning conditions are required and also that refurbishments and non- domestic are also required to meet BREEAM.	Wording changed within background text of LP10 as a result of comments.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text:</p> <p>"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."</p>		
Monica Tross	Sectary to planning committee Battersea Society			796	Policy LP10	<p>LP10 Responding to the Climate Crisis</p> <p>B1: The requirement for high standards such as meeting BREEAM 'Outstanding' is weakened by saying 'unless it can be demonstrated that this would not be technically feasible.' This caveat is symptomatic of many policies and their implementation throughout planning documentation.</p> <p>G : developers 'may' be required to fund post-construction monitoring of renewable and low-carbon equipment to demonstrate full compliance with the commitments identified within the permission rather than 'will' be required.</p> <p>H: 'Retrofitting should be maximised' but there is little indication of what is being done to actually maximise.</p>	<p>Whilst BREEAM is a nationally accepted procedure this is a uniform approach which for some schemes unfortunately is not always viable due to building constraints and achieving all the elements of BREEAM to achieve 'outstanding' status. Therefore, in certain circumstances where there is evidence to show this then some elements of the BREEAM may not be required. In LP10 this is not a requirement as again there may be some circumstance which preclude the development from requiring monitoring. Further wording to be added to background text at LP10 to clarify what measures can be employed.</p>	<p>Changes to LP10 background text to add wording regarding retrofit and to take a whole building approach.</p>
Monica Tross	Sectary to planning committee Battersea Society			798	Policy LP10	<p>Policies which do put us ahead of the pack and are therefore to be particularly welcome are:</p> <p>LP10:</p> <ul style="list-style-type: none"> <li>B1: Requirements to achieve higher standards e.g BREEAM 'Outstanding' up from 'Excellent' and</li> <li>B3: encouragement to meet BRE Home Quality Mark or Passive House.</li> </ul> <p>I: Inclusion of a firm policy on overheating</p>	<p>Supportive comments noted</p>	<p>No change considered necessary</p>
Monica Tross	Sectary to planning committee Battersea Society			800	Policy LP10	<p>Areas which fall particularly short taking of meaningful action on climate change include:</p> <p>LP10 D. 15.15 'Where development viability is a concern, affordable housing will be prioritised over zero carbon contributions.' This is a very short-sighted approach which could lead to higher retrofit costs later in order to meet national targets.</p>	<p>The carbon off set price and contributions hierarchy will be kept under review and updated where necessary.</p>	<p>Wording removed as a result of comments Wording within text has been removed as a result of the comment. Further wording has been added to LP61 to detail that where viability is an issue affordable housing will be prioritised.</p>
Cllr. Paul White				659	Policy LP10	<p>Carbon costs of demolition, construction/use of concrete and building material re-use should be intrinsic to every development plan, so a true cost of demolition/construction can be discerned. Where these levels are too high considering the social value of the new build, presumption should be given to maintenance and rehabilitation of current fabric.</p> <p>BRE Home quality mark or Passivhaus standards should be implemented in new developments, with final EPC ratings reaching "A," but at least "B" if this is not possible. All lighting, heating, cooking and power supplies driven by verifiable renewable energy, with heating, air and water reclaimed, filtered and recycled.</p>	<p>LP 10 B.3 encourages residential buildings to meet BRE Home Quality Mark or Passivhaus. Part D of the policy requires developers to incorporate measures to improve energy conservation and efficiency, as well as contributions to renewable and low carbon energy generation.</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Councillor Graham Loveland	Labour Group			643	Policy LP10	We propose that policy LP10 Responding to the Climate Crisis is strengthened by asking at para A for whole life carbon assessments for all major schemes. This is a London Plan requirement in respect of referable development and recognises that to properly understand the carbon impact of development we need to take account of the entire development phase including demolition and materials used. We also ask that consideration be given to the production of a Supplementary Planning Document providing detailed guidance on sustainable construction.	Agreed. At the time of writing the draft Local Plan the London Plan Whole life cycle assessments had not been as advanced. Now they are adopted the Local Plan will be updated to reflect the impact of carbon on development and the requirement for whole life cycle assessments. As the Local Plan advances there will be consideration to the need of SPDS.	Change to LP10 'Tackling Climate change' to require whole life cycle assessments
Cllr. Paul White				972	Policy LP10	Carbon Off-set costs should be much higher to encourage carbon reduction in developments. Wandsworth should have one of the highest off-set figures in London to encourage higher sustainable standards.	The Council is committed to tackling climate change and becoming the greenest borough in inner-London. As set out within the Draft Local Plan the Council has a road map which details the actions that will be required to reach the ambitious targets of 2030 and 2050. LP15 sets out that the aim is to reduce carbon emissions on site and it is only in exceptional circumstances that carbon offsetting would be considered. It is preferable to have policies and implement design at an earliest stage to incorporate measures to improve energy conservation and efficiency, as well as contributions to renewable and low carbon energy generation. As development schemes evolve there are often variations to the application and which case updating the offset amount may have to occur. It is therefore preferable to wait until occupation to ensure the correct amount is captured.	No change.
Katie Parsons	Historic Environment Planning Adviser  Historic England			875	Policy LP10	<p><b>LP10: Responding to Climate Change</b></p> <ul style="list-style-type: none"> <li>Historic England advocates the reuse, repair, upgrade, and retrofit of existing buildings rather than demolishing and rebuilding. We support an approach that focuses on understanding sustainability over the long term<sup>[1]</sup> and recommend that the policy recognises this more explicitly.</li> <li>By caring for and reusing historic buildings and heritage assets we can save energy and carbon dioxide through better maintenance, management and energy efficiency measures; and avoid the carbon dioxide of constructing new buildings and places. Paragraph 15.8 should be amended to better recognise the positive role that existing buildings have to play in addressing carbon costs.</li> <li>The policy talks about sustainably sourced materials but is silent on the importance of durability (London Plan 3.3.10). The carbon impact of buildings is not only in their operational carbon or energy efficiency – it is also in the carbon embodied in their materials and labour. This includes their manufacture, transportation, installation, durability, reparability and reusability. We advise that the policy is amended to recognise the need to consider the whole-life carbon of materials in decision-making. When you take the long view older buildings and traditional materials are often extremely effective.</li> <li>We advise that the policy is amended to refer to the importance of a whole building approach to retrofit. Modern buildings and historic buildings are different. Not just in their materials, but in their design and the way they function. Understanding how they function and all the factors that affect their energy use is critical for making decisions that improve the sustainability of structures we change, maintain and manage in the future. Factors include: construction, location, environment, historic significance, services and occupant behaviour. We call this the 'whole building approach' and it should be the starting point for any energy-efficiency improvements.</li> <li>We have published the following technical guidance and information which may be of use. Going Forward it may be helpful to draw attention to our guides in a bibliography or to provide links on the relevant GLA webpages where appropriate:</li> </ul> <p>Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historic and traditionally constructed buildings <a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/">https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-pt/</a></p>	Agreed, it is important that the policy makes it clear the importance of buildings over the longer term and the impact on sustainability, not just in their materials but in their design. Wording has been added to the policy lp 10 to refer to the circular economy principles. Wording has also been added to the policy to refer to embodied carbon. Wording has also been added to the background text of LP10 to refer to the importance of existing buildings and carbon emissions. The text has been updated with reference to a whole building approach to retrofit.	Agreed, wording has been added to LP10 and background text to reflect the comments that have been made.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Energy Efficiency and Historic Buildings: Energy Performance Certificates <a href="https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/">https://historicengland.org.uk/images-books/publications/eehb-energy-performance-certificates/</a></p> <p>Energy efficiency and traditional homes, Historic England Advice Note 14 <a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/">https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditional-homes-advice-note-14/</a></p> <p>A full list of all out technical guidance on energy efficiency can be found in our publication directory: <a href="https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/">https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/</a></p> <p>With part funding from Historic England, the STBA has published guidance on retrofitting traditional buildings based on current research and practice. Planning Responsible Retrofit of Traditional Buildings <a href="https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/">https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/</a></p> <p>[1] Historic England's Position on Climate Change and Sustainability <a href="https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/">https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/</a></p>		
Cllr Graeme Henderson and Cllr Rigby	Earlsfield Labour Party			926	Policy LP10	<p>Climate Change</p> <p>LP 10 – P230</p> <p>We also believe that new homes should be at the very least carbon neutral. Failing that, a very high proportion of energy used in the new homes should be from renewable sources. All developments should involve discussions with the developer to reach as high a level of sustainability as possible.</p>	Agreed	No change considered necessary
Hassan Ahmed  Hassan Ahmed	GLA			1117	Policy LP10	<p><b>Climate change</b></p> <p>The borough's aspirations to become zero carbon by 2050 aligns with the Mayor's ambition that</p> <p>London becomes a zero-carbon city by 2050 and is welcomed.</p>	Comment noted	No change considered necessary
Spencer Barnshaw	Secretary Battersea and Wandsworth Trades Union Council			1152	Policy LP10	<p>Section 15 – Climate Change</p> <p>LP10 – In order to facilitate the upgrading of ex-council housing stock to meet sustainability targets , BWTUC would urge the municipalisation of former council housing as outlined above.</p>	A paper was reported to the Housing and Regeneration OSC meeting in September 2020 which set out what the Council will do to improve Wandsworth's social housing and reduce carbon emissions. This includes commissioning a stock condition survey to identify potential opportunities for energy efficiency improvements, identifying projects and programmes to support through the capital programme which will have a carbon reduction benefit and setting targets for the next 10 years. Wandsworth aims to exceed the 35% CO2 reduction requirements on the Council's 1000 new homes development programme and produce an energy strategy for each housing development providing a full assessment of the benefits and viability of utilisation of cleaner and green technologies. The Green Homes Grant funding from central government includes a full suite of retrofit works to four tenanted properties including the installation of solar PVs, LED lighting and upgraded heating and heating controls. These works, which are underway, will improve the energy efficiency of these houses, raising the EPC ratings to C, and will act as a pilot to demonstrate the benefits of retrofit improvements for residents. It is not therefore required to transfer the housing stock as the measures identified above will help meet sustainability targets.	No change considered necessary
VSM Estates	VSM Estates	Freya Turtle	Associate Director  Turley Associates	1062	Policy LP10	<p><b>For full context, see the attachment with comment 1058</b></p> <p>Policy - Policy LP10 Responding to the Climate Crisis</p> <p>London Plan conformity - The requirement for BREEAM Outstanding on all non-residential buildings above 100 sqm is significantly more onerous than London Plan policy where there is no longer any requirement for BREEAM.</p>	Whilst BREEAM is a nationally accepted procedure this is a uniform approach which for some schemes unfortunately is not always viable due to building constraints and achieving all the elements of BREEAM to achieve 'outstanding' status. Therefore, in certain circumstances where there is evidence to show this then some elements of the BREEAM may not be required. It is felt that there is flexibility within the policy and therefore does not need removing.	No change considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>The requirement for reducing carbon emissions by at least 35% on site with 10%/15% from energy efficiency alone is consistent with the new London Plan Policy SI2. The potential requirement for post-construction monitoring of renewable and low carbon installations is consistent with Policy SI2 of the new London Plan. The requirement for an overheating assessment is consistent with London Plan Policy SI4.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - No comment</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - Remove requirement for BREEAM 'Outstanding' and put emphasis on holistic sustainable design including reducing water use, reducing embodied carbon and health and wellbeing rather than BREEAM certification.</p>		
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1228	Policy LP10	<p><b>See attachment for full context and associated images on comment 1224</b></p> <p><b>Policy LP10 Responding to the Climate Crisis</b></p> <p>Policy LP10 Responding to the Climate Crisis requires "new non-residential buildings over 100 sqm to meet BREEAM 'Outstanding' standard, unless it can be demonstrated that this would not be technically feasible." Schroders recognises the importance of striving towards a BREEAM rating of 'Outstanding' unless it is not technically feasible. It suggests that the supporting text of Policy LP10 should provide information about the circumstances where it would not be "technically feasible" to achieve a BREEAM 'Outstanding' rating, including where the constraints of a site do not make it possible to achieve. The addition of supporting text to define this would provide clarity for landowners and developers within the Borough.</p>	It would not be conducive to include a list where circumstances would be accepted to not achieve BREEAM outstanding. It could be misinterpreted and each application and site is unique in the issues it may face.	No change considered necessary
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1529	Policy LP10	<p>LP10 Responding to the Climate Crisis Paragraph 15.8 notes that the existing building stock in Wandsworth makes a significant contribution to the borough's carbon dioxide emissions. The NHS is committed to reaching 'net zero' carbon by 2040 and an 80% reduction in emissions by 2028 to 2032. The report 'Delivering a Net Zero National Health Service' (January 2020) sets out interventions which will help the NHS decarbonise, including action to reduce emissions from the NHS estate, a move towards a sustainable model of healthcare with care closer to home, promoting less polluting travel options and preventing ill health which reduces hospital admissions.</p>	Comment noted	No change considered necessary
Michael Atkins	Senior Planning Officer Port of London Authority			1467	Policy LP10	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>10. Tackling Climate Change</p> <p>- Policy LP10: Responding to the Climate Crisis.</p> <p>The PLA considers there must be a reference within part A2 (use of sustainable construction methods) of policy LP10 on the need to maximise the use of the river for freight, including for the transportation of construction materials to, and waste from a development site either directly to/from the site or through the supply chain. This would strongly align with the opportunities and challenges of the Local Plan to reduce carbon emissions and improve air quality and is supported by the Thames Vision, which includes the goal to see more goods and materials routinely moved on the river which is particularly relevant due to the number of safeguarded wharves located in the borough.</p>	Agreed. The use of the river for freight should be maximised and will help reduce carbon emissions	Wording to be added to LP10a.2 to refer to the use of river freight.
	Natural England			1358	Policy LP10	see attachment	Comment noted	No change

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Climate change adaptation</p> <p>We welcome consideration of climate change, as outlined in Section 15 of the Local Plan and that Wandsworth Borough declared a climate change emergency in 2019. We note that the Local Plan also considers the merits of green and blue infrastructure in climate change adaptation, and we are pleased to see the consideration of the natural environment in tackling climate change. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environments resilience to change should be protected. A list of useful links on consideration of climate change adaptation is provided at Annex B</p>		
Safestore		Matthew Lloyd Ruck	Planner Savills	1387	Policy LP10	<p><b>See attached to comment 1382 the full representation for context</b></p> <p><b>Tackling climate Change – LP 10</b></p> <p>The principle of sustainable design being reinforced within the policy to mitigate the impacts of climate change is noted. We are also pleased to see that LBW have recognised that some buildings may be challenged by the target requirement to meet BREEAM 'outstanding' accreditation. This is something that a B8 Storage and Distribution centres may find challenging to hit due to the nature of their relatively stripped back building form and function.</p> <p>LP 10 part (D) outlines that non-residential development should achieve a 15% reduction through energy efficiency measures alone, but this may be practically difficult for a B8 storage and distribution centre to achieve as the existing units may not be a large energy consumer.</p> <p>Moreover, the requirement to provide a payment in lieu via a carbon offset fund when on-site carbon reductions are not achieved able has the potential to impact the viability and subsequent deliverability of a development proposal.</p> <p>Therefore, in its current state, policy LP 10 is not effective as it may form a potential barrier for the redevelopment of a site.</p> <p>We would therefore suggest the policy is amended to read as:</p> <ol style="list-style-type: none"> <li><i>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:</i></li> </ol> <p><i>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%. All other new residential buildings should achieve a minimum on-site reduction of 35%.</i></p> <p><i>Residential development should achieve a 10% reduction and non-residential development should achieved a 15% reduction through energy efficiency measures alone, <u>where practical and viable to do so.</u></i></p> <p><i>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, <u>subject to viability.</u></i></p>	<p>The London Plan Policy SI2 sets out the requirement for non residential development to achieve 15 per cent reduction through energy efficiency measures and that if that can not be met the a contribution to the carbon off set fund should be made. In addition within the background text to policy LP10 the Council recognises that there may be exceptional circumstances where it is not technically feasible for a development to achieve a reduction in carbon dioxide emissions. Any justifiable shortfall in on-site reductions will need to be met through a cash-in-lieu contribution to the Council's Carbon Offset Fund, agreed through a Section 106 legal agreement in line with the Planning Obligations SPD. The Carbon off set fund has been set and is in line with the London Plan figure of £95 per tonne. This has been through viability testing by the GLA.</p>	<p>No changes to the Local Plan are considered necessary</p>
Julia Raeburn	Sutherland Grove Conservation			1403	Policy LP10	<p><b>LP10 - Responding to the Climate Crisis</b></p>	<p>Additional sentence on the potential for consolidation of existing waste sites included.</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Area Residents Association					SGCARA strongly supports environmental considerations being at the heart of all building in Wandsworth. Every home should have a means to produce some of its own power – solar panels or solar tiles are an obvious starting point. Inclusion of water-butts for rainfall-collection for garden-watering should be universal for new houses with gardens.		
Diana McCann	Boroughs Coordinator The Blue Green Economy			1432	Policy LP10	<p><b>15 / LP10 Tackling climate change</b></p> <p>15.1 ..to mitigate and adapt to the effects of climate change... Note best practice for adaptation in UK Climate Change Committee reports. Currently mixed message with adaptation elements included within mitigation terminology (not clarified by expansion of Point H although 15.19 noted). <a href="https://www.theccc.org.uk/publication/progress-in-preparing-for-climate-change2019-progress-report-to-parliament/">https://www.theccc.org.uk/publication/progress-in-preparing-for-climate-change2019-progress-report-to-parliament/</a></p> <p>Note new guidance to be given by GLA on 'cool roofs'. This includes painting white and 'green planted surfaces' but should extend to energy savings (e.g. solar heat gains and heat losses through surfaces) as well as other blue green benefits.</p> <p>Point C: 'Maximum feasible reductions in carbon emissions' should not be achieved to the detriment of health and wellbeing. This extends to better ventilation and reduced airborne infection risk.</p> <p>Local capture and reuse of rainwater where applicable. Consideration should also be made to disconnect downpipes if possible. Note London drainage hierarchy should be adopted throughout the Local Plan. In particular apply within LP12.</p> <p>Noted in 15.41.</p> <p><a href="https://www.london.gov.uk/what-we-do/planning/london-plan/current-londonplan/london-plan-chapter-five-londons-response/pol-12">https://www.london.gov.uk/what-we-do/planning/london-plan/current-londonplan/london-plan-chapter-five-londons-response/pol-12</a></p>	Agreed, the tackling climate change does have elements of adaption outwith the heading but overall the whole policy captures adaptation and mitigation aims.LP10 background text paragraph 15.22 discusses ventilation as a way to prevent overheating. and paragraph 15.6 refers to rainwater harvesting.	No changes to the Local Plan are considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1565	Policy LP10	<p><b>LP10 Responding to the climate crisis:</b></p> <p><b>Sustainable Construction and Design</b></p> <p>While there are specific requirements in paragraphs D, E and F with regard to energy and carbon dioxide emissions, the requirement that development otherwise address the broader sustainability criteria is addressed in paragraphs A, B and C.</p> <p>Paragraph A</p> <p>While the ambitions stated are commendable, it is not always clear whether they are requirements or merely recommendations.</p> <p>Paragraph B</p> <p>The Building Research Establishment Environmental Assessment Method (BREEAM) is a nationally accepted procedure for evaluating a broad range of sustainable practices that is objective, measurable and industry recognised. It offers a third party accredited evaluation of sustainability. The requirement to meet BREEAM 'Outstanding' standard in sub paragraphs 1 and 2 is therefore entirely appropriate, but in both cases this is watered down by the 'let-out' clause "unless it can be demonstrated that this would not be technically feasible". BREEAM is <i>composed</i> of technically <i>feasible</i> requirements and there are choices within the accreditation process, so that the only reason for not achieving excellence would be a financial excuse. Allowing such a claim would be an inappropriate response in the light of the <i>emergency</i> nature of the environmental requirements for development and the critical nature of the crisis. Chosen responses to the crisis should not be tradable. The application of paragraphs 1 and 2 is restricted to 'non-residential' and 'change of use to</p>	<p>BREEAM Outstanding in some instances may not be achievable depending on the shape and size of the site. The developer must still demonstrate why it can not be achievable to the satisfaction of the Council. HQM and Passivhaus are also encouraged but it is not always possible to apply the standards and therefore it has not been made a mandatory requirement.</p> <p>Agreed paragraph C should be incorporated in to paragraph D for consistency and update text to reflect strengthening of wording.</p> <p>The percentage improvement and reduction wording at LP10 D is the terminology used within the London Plan.</p> <p>Wording has been added to the background text to explain zero carbon.</p> <p>Wording added to the Energy Policy LP11 to refer to the London Plan energy hierarchy.</p>	<p>Wording altered in LP10 to remove reference to TER and Part L.</p> <p>Wording has been added to the background text to explain zero carbon. Wording added to the Updated LP10 to ensure consistency.</p> <p>Energy Policy LP11 updated to refer to the London Plan energy hierarchy.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>residential' respectively, while the much weaker paragraph 3 deals with actual residential development.</p> <p>Paragraph 3: In England the central BREEAM rating is for 'non-domestic buildings' because the BRE developed the 'Home Quality Mark' for residential development. One star to five star ratings are available for the Home Quality Mark. While central government has reduced its backing to the BRE evaluation for residential properties, the Local Planning Authority could still <i>require</i> a high Home Quality Mark rating for developments where currently the Wandsworth Local Plan only 'encourages' residential buildings to meet the Home Quality Mark or Passivhaus. Thus there is no mandatory standard for sustainable residential development in the Local Plan. Bearing in mind the high proportion of (mostly luxury) residential development in the Borough, this is an extremely lax response to the climate &amp; ecological emergency.</p> <p>Paragraph C</p> <p>It's not clear why this requirement has a separate paragraph and why it's not included under paragraph D. 'should achieve. . .' is less strong than 'shall achieve. . .', while 'heritage and character of the building' is surely a too loosely defined excuse for not meeting the requirements stated, unless it refers to Listed Buildings or buildings in protected (e.g. Conservation) areas?</p> <p><b>Reducing Carbon Dioxide Emissions</b></p> <p>Paragraph D</p> <p>Opening paragraph: '. . . where targets are expressed. . .' confuses 'targets' (TER) and 'design/required' (DER) as set out in the Approved Document. The Approved Document states:</p> <p>"Target Fabric Energy Efficiency (TFEE) rate: The Target CO2 Emission Rate (TER) and Target Fabric Energy Efficiency (TFEE) rate are the <i>minimum</i> energy performance requirements for a new dwelling approved by the Secretary of State in accordance with regulation 25. The TER is expressed as the mass of CO2 emitted in kilograms per square metre of floor area per year. The TFEE rate is expressed as the amount of energy demand in units of kilowatt-hours per square metre of floor area per year. It is the DER that should be required to show a 35% reduction on the TER.</p> <p>Calculating the CO2 emissions from and fabric energy efficiency performance of the actual dwelling:</p> <p>To comply with regulations 26 and 26A, the Dwelling CO2 Emission Rate (DER) and the Dwelling Fabric Energy Efficiency (DFEE) rate must be no worse than the TER and TFEE rate calculated as set out in paragraphs 2.2 to 2.7 of Approved Document L.</p> <p>Sub-paragraph 1, 2 and 3: The meaning of a 'minimum on-site reduction' does not sit well with the opening paragraph which uses the term 'a percentage improvement'. Better to use 'improvement' or 'reduction' in all statements. It is actually quite hard to understand these requirements without referring to both the London Plan and the Building Regulations Approved Document L</p> <p>Sub-paragraph 4, should differentiate between 'technical non-feasibility' and 'non-viability'.</p> <p><b>The Energy Hierarchy</b></p> <p>The London Plan 'Energy Hierarchy' is a very loosely defined set of criteria (be lean, be clean, be green, be seen) that relate to the achievement of 'a zero-carbon city'. This needs to be tied down more to actual requirements</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>or is open to manipulation by potential developers and their professional teams. The terms 'zero carbon', 'net-zero carbon and 'zero-emissions' are approximate and moving targets that fall short of the precision required of a planning policy document.</p> <p>The London Plan definitions should possibly be incorporated into the Wandsworth Local Plan:</p> <p><b>Zero-carbon:</b> Activity that causes no <i>net</i> release of carbon dioxide and other greenhouse gas emissions into the atmosphere.</p> <p><b>Zero-emission:</b> Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.</p> <p><b>Energy Assessments</b></p> <p>Paragraph F: Does the plan define the difference between 'major' and 'minor' non-residential developments? It should.</p> <p><b>Compliance and Monitoring</b></p> <p>The requirement for monitoring is inconclusive, leaving it to the attachment of conditions to any relevant planning permission. How will the need for monitoring be assessed?</p>		
Mr Robert Arguile	Chair The Putney Society			315	Policy LP11	LP11.C. Gas boilers in new buildings will shortly be banned by national legislation.	Comment noted. Wording to be updated reflecting London Plan requirements and the move away from CHP.	Changes to LP11 Energy Infrastructure have been made to take account of the new London Plan requirements and the focus on gas boilers/CHP
Lois Davis	Co-ordinator Wandsworth Green Party			455	Policy LP11	<p>The requirement in LP11 A to connect to an existing decentralised energy network (DEN) is also welcomed but as development continues apace in advance of DENs coming into existence we need some provisions to stop the use of gas-fired heating systems as an interim measure.</p> <p>LP11 C further states that applicants are required to consider the installation of low, or preferably ultra- low NOx boilers. Given the climate emergency there should surely be a requirement to fulfil rather than consider fulfilling and a requirement rather than a preference for ultra-low NOx boilers.</p>	Comment noted. Wording to be updated reflecting London Plan requirements. However, it wording will not be changed regarding the requirement to consider low Nox boilers as there may be instances where application is not beneficial for the scheme.	Changes to LP11 Energy Infrastructure have been made to take account of the new London Plan requirements and the focus on gas boilers/CHP
Monica Tross	Sectary to planning committee Battersea Society			797	Policy LP11	<p>LP11: Energy infrastructure:</p> <p>Applicants are 'required to consider' the installation of low, or preferably ultra-low NOx boilers. Given the climate emergency there should surely be a requirement to fulfil rather than consider fulfilling and a requirement rather than a preference for ultra-low NOx boilers.</p>	Comment noted. Wording is considered acceptable as certain schemes would not always be achievable or in the best interests of the scheme to install certain types of boilers.	No changes to the Local Plan are considered necessary
Monica Tross	Sectary to planning committee Battersea Society			801	Policy LP11	<p>Areas which fall particularly short taking of meaningful action on climate change include:</p> <p>LP 11 Energy Infrastructure</p> <p>The Council has invested considerable sums in the Embassy Quarter Heating Network and the Battersea Power Station Heating Network but although new developments need to demonstrate future connectivity, Section 15 lacks definitive directives on, and provision for, monitoring progress on the use of decentralised energy networks by both new developments and existing properties which could switch from existing boiler plant and connect to the network.</p>	As set out in LP10 Conditions may be used to ensure the principles outlined within this Policy are adhered to throughout the lifetime of the development. In addition, major development proposals may be required to fund post-construction monitoring of renewable and low-carbon equipment to demonstrate full compliance with the commitments identified within the permission, up to a 4-year period.	No changes to the Local Plan are considered necessary
VSM Estates	VSM Estates	Freya Turtle	Associate Director	1063	Policy LP11	<b>For full context, see the attachment with comment 1058</b>	Comment noted and accepted, further wording will be added to the policy to reflect the direction of the New London Plan to reference the London Plan Policy SI3 hierarchy.	Further wording has been added to the policy to reflect the direction of the New London Plan



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
			Turley Associates			<p>Policy - Policy LP11 Energy Infrastructure</p> <p>London Plan conformity - Policy LP11 seeks to ensure that new developments, in areas without any existing or planned Decentralised Energy Networks, should incorporate on-site decentralised energy networks such as combined heat and power. This is not consistent with London Plan Policy SI3, which places combined heat and power as being less desirable than air source heat pumps.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - Policy LP11 should also make consideration for alternative energy strategies/technologies that do not connect to an existing decentralised energy network, particularly if it can be demonstrated that it would be more efficient, clean and decarbonised than the decentralised energy network. Energy infrastructure technologies are rapidly evolving and the DHN's that have been installed in the last five years are already dated – policy should try and look to the future for accepting potential new approaches.</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - Remove preference for on-site combined heat and power and make reference to London Plan Policy SI3 hierarchy; and allow for alternative strategies that can be demonstrated as being more efficient, clean and decarbonised than the decentralised energy network.</p>		
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1132	Policy LP11	<p>Policy LP11 Energy Infrastructure</p> <p>The policy currently states that new development will be expected to connect to any existing decentralised energy network (DEN). This does not account for the potential cost and technical challenges associated with providing a connection. As such, it is suggested that the wording is updated as follows to provide further flexibility:</p> <p>LP11 Energy Infrastructure</p> <p>New development will be expected to connect to any existing decentralised energy network (DEN) <u>unless it is not technically feasible or the most energy efficient solution.</u> 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.</p>	Comment noted. The LP11 policy is in line with the London Plan in expecting to connect to an existing DEN. This policy is carried forward from the existing Local Plan	No changes considered necessary to the Local Plan
Terence Brown	Coordinator Wandsworth Friends of the Earth			1573	Policy LP11	<p><b>LP 11; Energy Infrastructure</b></p> <p>These are welcome planning requirements, though paragraph C 'applicants are required to <i>consider</i>. . .' seem a rather weak requirement for something that is entirely technically feasible.</p>	Comment noted. Wording to be added to expand LP 11 to reflect London Plan.	LP 11 updated to reflect London Plan
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1730	Policy LP11	<p>Policy LP11 Energy Infrastructure</p> <p>The policy currently states that new development will be expected to connect to any existing decentralised energy network (DEN). This does not account for the potential cost and technical challenges associated with providing a connection. As such, it is suggested that the wording is updated as follows to provide further flexibility:</p>	Comment noted. The LP11 policy is in line with the London Plan in expecting to connect to an existing DEN. This policy is carried forward from the existing Local Plan	No changes considered necessary to the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>LP11 Energy Infrastructure</p> <p>New development will be expected to connect to any existing decentralised energy network (DEN) <u>unless it is not technically feasible or the most energy efficient solution.</u></p> <p>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.</p>		
Mr Robert Arguile	Chair The Putney Society			317	Policy LP12	<p>Table to LP12.A Zone 1, Flood risk assessment column '<i>development over 1 ha .. or for all other development</i>' Which?</p> <p>LP12.B Basements - Zone 1. SuDS does many good things, but doesn't protect individual buildings from surface water flooding.</p> <p>LP12.C We welcome a recognition of the importance of SuDS. It is easier to monitor this requirement in the public realm and in major new developments. The current requirement is that any paving over 5m2 is permeable but we see no evidence that this requirement is imposed by the planners. Each year increasing areas of private gardens disappear under permanent paving.</p>	Comment noted and support welcomed. The General Permitted Development Order allows for non-permeable surfaces up to a 5m2 threshold (apart from Article 4 conservation areas where they disapply the GDPO.) Therefore a policy approach on this would not be effective.	No changes considered necessary to the Local Plan
Lois Davis	Co-ordinator Wandsworth Green Party			452	Policy LP12	<p>Surface Water Flooding is encapsulated in policy section LP12 clauses C &amp; D. It is not clear what the Council requires in the case of brownfield site redevelopment. Would requirements be evaluated in terms of a theoretical greenfield run-off rate?</p>	Comment noted. Greenfield run off rates would be applied to all development including brownfield sites.	No changes considered necessary to the Local Plan
Mr David Wilson	Senior Town Planner Thames Water			744	Policy LP12	<p><b><u>LP12 Water and Flooding</u></b></p> <p>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</p> <p>flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>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. 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> <p>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.</p> <p>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. 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.</p> <p>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.</p>	Comment noted and agreed.	<p>An extra criteria has been added to LP 12 to account for the requirement for surface water drainage.</p> <p>Water/ Sewerage infrastructure is classed as essential infrastructure in the NPPG and therefore is already afforded the necessary protection to enable works close to the river or in flood risk areas.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>SuDS not 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.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: "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."</p>		
Diana McCann	Boroughs Coordinator The Blue Green Economy			1433	Policy LP12	<p><b>LP12 Water &amp; Flooding</b></p> <p><b>Sustainable Drainage</b></p> <p>Point C. The Council will require the use of Integrated Water Resource Management (IWRM) with Blue Green Technologies (BGT) which includes but is not limited to the use of Sustainable Drainage Systems (SuDS) in all development proposals.</p> <p>Greater clarification is needed on percentage attenuation definition with appropriate applications. As part of a wider assessment of flood risk, local planning decisions should consider use of upstream rewilding, reduction in canalisation and use of IWRM + BGT in addition to SuDS (one blue green solution of many). Following the rewilding approach of 'Making Space for Water', this thinking should be adopted for high-density urban fabric as well incorporating porous and/or permeable paving and roads as well. An added benefit from porous and/or permeable paving and roads includes reduced pollution from surface water run-off into the water courses, e.g. microplastics.</p>	Comment noted. The use of the term SUDS is a general term which could already include IWRM or Blue/Green technologies. It is considered that the term SUDS is well understood and is consistent with the wording of the NPPF. The appropriate level of attenuation would be assessed within a detailed Flood Risk Assessment as part of an application. The wording of the policy is considered appropriate, setting out the aim for 100% attenuation. All flood risk measures including the techniques suggested could be included as part of a Flood Risk Assessment and would be considered in the same vein as more traditional techniques.	No change considered necessary
Terence Brown	Coordinator Wandsworth Friends of the Earth			1574	Policy LP12	<p><b>LP 12 Water and Flooding</b></p> <p>We have no comments on the provisions relating to these wide ranging technical requirements for development in flood risk areas, which seem to constitute the most complete requirements of the policies.</p> <p><b>Sustainable Drainage</b></p> <p>Surface Water Flooding is encapsulated in policy section LP12 clauses C &amp; D. It is not clear what the Council requires in the case of brownfield site redevelopment. Should requirements be evaluated in terms of a theoretical greenfield run-off rate?</p>	Comment noted. Greenfield run off rates would be applied to all development including brownfield sites.	No change considered necessary
Rachel Holmes	Planning Advisor Environment Agency			1615	Policy LP12	<p>See attachments</p> <p>Section 1 – Policy and Sustainability Appraisal</p> <p>Flood risk</p> <p>The comments below are in relation to policy 'LP12 Water and Flooding'. Please note our comments are related to fluvial and tidal flood risk only.</p> <p>Tidal and fluvial approach</p> <p>The tables in Part A Flood Risk Management and Part B Basements and Subterranean Developments include requirements for tidal and fluvial flooding in combined text. We strongly recommend separating the fluvial flood risk and tidal flood risk requirements because the approach for fluvial and tidal flood risk is different due to the different levels of risk. Separating the fluvial and tidal requirements will ensure the policy is clearly set out will avoid room for interpretation and confusion. In the previous local plan the fluvial and tidal</p>	The differences in requirements depending on their location are clearly set out within the existing updated text. The table in the adopted Plan has been through a process of updating and improvement and many of the concerns raised have already been addressed in Policy LP12. Nevertheless, Table 3 has been updated to modify the text as a result of some of the concerns raised.	No change to the format of the Policy is considered necessary. However, Table 3 has been amended to account for the requirement for less vulnerable development to be raised above the appropriate flood levels for flood zones 2 and 3a, and the removal of the 'sleeping element' criteria.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>requirements were clearly set out within a table. We strongly recommend reinstating this approach within this local plan.</p> <p>We have reviewed Table 2.2 of Policy DMS 5 Flood risk management of the Development Management Policies Document (March 2016) and believe that with some amendments this policy could be carried forward to the new Local Plan instead of the new proposed table. This is because the layout and wording is much clearer than those newly proposed. Please see the attached document titled 'Table 2.2 Policy DMS 5 (2016) – Amendments' for our recommended changes to this policy.</p> <p>Recommended action: separate fluvial and defended tidal requirements.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1619	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Part E2</p> <p>We strongly recommend that part E2 is amended to include '...to be carried out in the future in a cost effective manner'. This wording can help us secure better setbacks from flood defences. In some recent cases, developers have offered extremely minimal set backs from flood defences and demonstrated that certain technological strategies mean the defences can still be maintained and upgraded. These technological solutions are often high cost. The larger the set back the more strategies are available for future maintenance and upgrading in a cost effective way.</p> <p>Recommended action: we recommend amending the wording as proposed above.</p>	Comment agreed.	The wording of the policy has been amended in response to the comment raised.
Rachel Holmes	Planning Advisor Environment Agency			1715	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>General comment 1</p> <p>Part A opening paragraph states that 'all development should avoid, or minimise, contributing to all sources of flooding...'. The term 'minimise' is weak wording and suggests that some increase in flood risk is acceptable. This is contrary to NPPF which states that 'development should be made safe for its lifetime without increasing flood risk elsewhere'. We strongly recommend this wording is altered.</p> <p>Recommended action: we strongly recommend reviewing the wording of this phrase</p>	Comment noted and agreed.	The wording of the policy has been amended in response to comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1716	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Sequential Approach</p> <p>Part A opening paragraph fails to encourage a sequential approach to the layout of sites. We strongly recommend including the requirement for a sequential approach to the layout of sites affected by flood risk within this policy, as encouraged by national policy.</p> <p>Recommended action: we strongly recommend including the requirement for a sequential approach within this policy.</p>	Comment noted and agreed.	The wording of the policy has been amended in response to comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1717	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Floodplain compensation</p> <p>The policy fails to identify that there should be no loss of flood storage in areas affected by fluvial flooding. Any increase in built footprint within the fluvial 1 in 100 inclusive of climate change flood extent must be compensated</p>	Comment noted and agreed.	The wording of the policy has been amended in response to comments raised.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						for on a level for level, volume for volume basis. This is to ensure that development does not increase flood risk elsewhere which is against national policy. Recommended action: incorporate requirements for floodplain compensation within LP12 Water and Flooding		
Rachel Holmes	Planning Advisor Environment Agency			1718	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Part A states that 'on-site attenuation to alleviate fluvial and/or surface water flooding over and above the Environment Agency's floodplain compensation is required where feasible'. The requirement for floodplain compensation is not just an Environment Agency requirement. It is a stance adopted by the Local Planning Authority following our guidance to ensure that flood risk is not increased elsewhere in line with national policy. It is therefore a requirement of national and local policy and not just an Environment Agency ask. We strongly recommend rewording this aspect of the policy to not place ownership solely on the Environment Agency. Furthermore, we encourage any additional flood storage as part of development proposals encouraged by this part of the policy. We would like to note, however, that many sites' constraints often restrict this overprovision of storage and that developer's proposals often do not leave any space available to provide an overprovision due to size of plots or their chosen designs. If the council truly seeks to secure additional flood storage provision, we would recommend that stronger wording is implemented within the policy. You could potentially request a certain percentage increase in storage or percentage reduction of built footprint, a similar approach to the 10% Biodiversity Net Gain requirements set out in the Environment Bill. The implications and practicalities of this would need to be clearly thought out before including it as a policy requirement. The current wording – 'where feasible' – is unlikely to achieve any extra flood storage provision through the development management process, as the wording is not strong enough for an objection. Even in its current wording it is welcomed as it can aid discussions in persuading developers to consider an increase in flood storage.</p> <p>Recommended action: we recommend you review the policy requirements and wording.</p>	The words 'where feasible' have been removed and reference to the LLFA inserted. It is acknowledged that floodplain compensation levels is not a requirements of the EA but it is still considered appropriate to have wording in the text that advice of the EA should be followed in this regard.	The wording of the policy has been amended in response to comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1719	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Please note our comments relate to fluvial floodplain compensation only. Any surface water matters should be commented on by the Lead Local Flood Authority.</p> <p>Safe access and egress</p> <p>We would like to note that all policy requirements relating to safe refuge and safe access and egress should be discussed with the Local Planning Authority's Emergency Planning Team as the Environment Agency is not responsible for commenting on these issues at the planning application stage. We strongly recommend clarifying with this team that they support the approach laid out within the Local Plan.</p> <p>Table: Flood Zone 3b</p> <p>We broadly support the recommendations made in the table under Flood Zone 3b. We would like to highlight that it states that 'redevelopment of existing developed sites will only be supported if...a net flood risk reduction is proposed'. This raises a similar question as above. What net flood risk reduction are you seeking? – increased flood storage, reduction in vulnerability, reduction of users? Furthermore, who is responsible for enforcing this? This is stronger than our usual stance on flood risk. Whilst we support this stronger stance, we would require the council to be responsible for objecting to development contrary to this requirement. Whilst we would not object, we will be able to offer guidance to the council on this matter.</p> <p>Recommended action: we recommend you consider the questions raised above.</p>	<p>Comment noted. Flexibility is sought in this regard as a flood risk assessment would offer solutions to achieving a net flood risk reduction overall. It is not considered helpful to impose a steer for how this should be delivered as it depends on site specific circumstances.</p> <p>The officers working as the LLFA have been consulted with on all aspects of surface water policy matters and agree with the approach taken.</p>	No change considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Rachel Holmes	Planning Advisor Environment Agency			1720	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>The final paragraph in the Flood Zone 3b section of the table includes one very long sentence. This should be reworded to provide greater clarity and ease understanding for the reader. It also states '...or to the maximum acceptable height possible below this, should sufficient justification be provided...'. This could potentially leave users with no safe refuge and no safe access and egress which would put people at risk from flooding. Although responsibility for emergency planning matters lie with the Local Authority's Emergency Planning Team, we strongly recommend this phrase is removed as a matter of safety. If the policy wording does remain to include this phrase, it raises the question of what is sufficient justification? Further guidance should be given to ensure consistency within decision making and evidence provision and to ensure adequate safe refuge is provided in as many instances as possible.</p> <p>Recommended action: we strongly recommend removal of this phrase from the policy.</p>	Comment agreed.	The wording of the policy has been amended in response to comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1721	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Table: Flood Zone 3a (tidal/fluvial)</p> <p>Tidal and fluvial approach</p> <p>As highlighted above, we strongly recommend you separate the tidal and fluvial requirements.</p> <p>Acceptable land uses</p> <p>Essential infrastructure is also an acceptable land use within Flood Zone 3a.</p> <p>Fluvial: finished floor level requirements</p> <p>For all developments of all vulnerability classifications affected by fluvial flooding, all finished floor levels should be set at least 300mm above the 1 in 100 plus appropriate climate change allowance flood level. As this is a requirement for all finished floor levels, the reference to sleeping accommodation can be removed.</p> <p>Recommended action: Amend fluvial finished floor level requirements within the policy</p>	<p>The differences in requirements depending on their location are clearly set out within the existing updated text and it is considered no change is necessary.</p> <p>The comment regarding finished floor level requirements is agreed.</p>	The wording of the policy has been amended in response to comments raised on finished floor levels.
Rachel Holmes	Planning Advisor Environment Agency			1722	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Fluvial: basements</p> <p>For areas affected by fluvial flooding, we support that self-contained residential basements and bedrooms at basement levels are not permitted. In these locations, it should be a requirement that all basements must have access threshold levels set to a minimum of 300mm above the 1 in 100 inclusive of climate change flood level. All basements must also have internal staircases to access floors set at a minimum of 300mm above the 1 in 100 inclusive of climate change flood level.</p> <p>Recommended action: amend fluvial basement requirements within the policy</p>	Comment noted. Requirements for minimum access thresholds and incorporation of staircasing at appropriate levels are already set out in the existing table 'Requirements for Basements in Flood Zones' but have been amended to incorporate revised wording.	The wording of the policy has been amended in response to comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1723	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Fluvial: safe refuge</p> <p>Again, whilst responsibility for commenting on Emergency Planning does not lie with the Environment Agency, we recommend that in areas affected by</p>	Comment noted. It is considered that 300mm is an appropriate depth for safe refuge and would prefer to keep the wording referencing the EA to allow for any site-specific changes to the proposed 300mm if considered necessary at application stage in liaison with the Council's emergency planning officer.	No change to Policy is considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						fluvial flood risk, safe refuge is required 300mm above the 1 in 100 inclusive of climate change flood level.  Recommended action: discuss safe refuge requirements with the Emergency Planning Team		
Rachel Holmes	Planning Advisor Environment Agency			1724	Policy LP12	See attachments on 1615 for more detail  Tidal defended: finished floor level requirements  In tidal defended areas, only sleeping accommodation must be located on finished floor levels set at or above the appropriate extreme water level as advised by the Environment Agency. Whilst we recognise that national policy references the 1 in 200 tidal flood level, this is not relevant in London due to the Thames Tidal Flood defences, so we recommend using the term 'appropriate extreme water level as advised by the Environment Agency' instead.  Recommended action: Amend tidal defended finished floor level requirements within the policy	Comment agreed.	The wording of the policy has been amended in response to comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1725	Policy LP12	See attachments on 1615 for more detail  Tidal defended: basements  For tidal defended areas, we support that no self contained residential basements should be permitted. All access threshold levels must be set at or above the appropriate extreme water level as advised by the Environment Agency. They must also have internal staircases to access floors set at or above the appropriate extreme water level as advised by the Environment Agency. Your policy does not allow any bedrooms at basement level. Whilst we support this stance, it is stronger than our own stance of allowing basement bedrooms in tidal defended areas as long as there is an internal stair case access and threshold levels set above the flood level. We therefore would not be in a position to object in line with this policy. Responsibility for objecting to such applications lies with the Local Planning Authority, although we will offer our guidance where required.  Recommended action: amend tidal defended basement requirements within the policy.	Comment agreed.	Outcome: The wording of the policy in relation to bedrooms at basement level has been amended to accommodate bedrooms at basement level in defended tidal locations in line with comments raised.
Rachel Holmes	Planning Advisor Environment Agency			1726	Policy LP12	See attachments on 1615 for more detail  General comment  The phrase '...the only exception to this is where the applicant has demonstrated that a permanent fixed barrier is in place to prevent floodwater from entering any sleeping accommodation that is located below the extreme water level in accordance with the hazard advice above...' is used again within this part of the policy. If this stance is adopted, we recommend it is included for areas of defended tidal flood risk but not areas of fluvial flood risk.  Recommended action: remove this phrase in the policy from fluvial flood risk areas.	Comment agreed.	The wording of the policy has been amended in response to the comment raised.
Rachel Holmes	Planning Advisor Environment Agency			1727	Policy LP12	See attachments on 1615 for more detail  Part F: The Sequential Test  It should be made explicitly clear in this section that sites, where necessary, will also be required to pass the Exceptions Test. This is relevant also for all allocated sites that have passed the Sequential Test.	Comment agreed.	The wording of the policy has been amended in response to the comment raised. Part F has also been moved to the initial part of LP12 as it is regarding specifics of planning applications which is covered in this part of the Policy,

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Recommended action: ensure requirements for passing the Exception Test is made clear even when sites have already passed the Sequential Test.		
Rachel Holmes	Planning Advisor Environment Agency			1728	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Flood Defences</p> <p>We strongly support the recommendations in Policy PL12 Water and Flooding, Part E 'Flood Defences'. We have the following recommendations: Thames Estuary 2100 Plan</p> <p>Raising requirements</p> <p>In general, we are pleased that the policy references the Thames Estuary 2100 Plan. However, it does not highlight the need for defences to be raised to the required levels in preparation for future climate change impacts. It should make specific reference to the fact that defences will need to be raised, including by how much and where. This information can be found in the Thames Estuary 2100 Wandsworth Council Briefing which I have attached.</p> <p>The requirements for Thames Estuary 2100 Plan flood defence raisings in Wandsworth are as follows:</p> <p>The Thames Estuary 2100 Plan's requirements for Wandsworth include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. The future raising requirements of the flood defence levels in Wandsworth are as follows:</p> <ul style="list-style-type: none"> <li>• Raising of all tidal defences along the Thames upstream of the Thames Barrier by up to 0.5 m by 2065, and by an additional 0.5 m by 2100.</li> <li>• Raising of defences on the Lower reach of the River Wandle (downstream of the existing sluice and weir) in 2065 and 2100 by up to 1m in total. Additional flood mitigation will be needed further upstream in 2065 and 2100 for fluvial flows and higher water levels on the Thames. This is not covered by TE2100.</li> <li>• Raising of defences on the Beverly Brook between the outfall structure and the Thames in 2065 and 2100, by up to 1m in total. Additional flood mitigation may be needed upstream of the outfall in 2065 and 2100 for fluvial flows and higher water levels on the Thames. This is not covered by TE2100.</li> </ul> <p>This allows for projected increases in sea level to 2135.</p> <p>Recommended action: ensure the Flood Defence policy incorporates reference to flood defences needing to be raised in line with the TE2100 Plan. Add further supporting text about the exact raising requirements.</p>	Comment noted. It is not considered necessary to contain the detailed wording of the TE2100 project within the Local Plan but it is agreed that further wording be added to highlight the importance of the Plan, particularly in regard to the need to raise flood defences.	The wording of the policy and supporting text has been amended to contain further reference to the need to plan for the requirements of the TE2100 Plan.
Rachel Holmes	Planning Advisor Environment Agency			1729	Policy LP12	<p>See attachments on 1615 for more detail</p> <p>Set back from flood defences and main rivers</p> <p>Land is required for continued maintenance of the flood defences, and so corridors of land alongside the existing defence lines should be safeguarded for this reason. This should include sufficient space for vehicle and plant access for the ongoing maintenance and repair of the defences.</p> <p>Additionally, when the defences come to be raised, space will also be needed for these defence engineering works. We suggest that the width of land that should be safeguarded for future flood risk management interventions on the Thames could be of the order of 16 metres. Set back of at least 8 metres</p>	<p>Support noted. These requirements to set back development are stated in Policy LP 12 Part 3.</p> <p>Comment agreed regarding culverts.</p>	The wording of the policy has been amended in response to acknowledge the importance of culverted rivers.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>should be secured for all other main rivers. More space may be required especially if wider environmental and place making improvements are to be achieved. However, this will depend on the characteristics of the site, the defence type and any proposed riverside improvements, and should be discussed and agreed with us on a site by site basis.</p> <p>We strongly support that Part E3 'Flood Defences' of LP12 'Water and Flooding' incorporates the requirement of setting back development from existing flood defence infrastructure and river banks.</p> <p>Please refer to the Wandsworth TE2100 Council Briefing document (attached) for further advice and guidance, including on recommended policy wording</p> <p>Culverts</p> <p>We support Part E7 'Flood Defences' which states that 'further culverting and building over culverts should be avoided'. We expect developments to be set back at least 8metres from culverts, as with other main rivers, and would not allow any further encroachment towards culverts. This is because any additional load on top of a culvert or disturbance nearby to a culvert could damage its structural integrity and increase flood risk elsewhere. Development within proximity to a culvert may require a culvert survey to assess its condition and exact location. We strongly encourage deculverting where possible. Any applications proposing to deculvert must demonstrate that there is no increase in flood risk elsewhere as a result.</p> <p>Recommended action: include further details on culvert requirements within supporting text. Include recommendation for deculverting within policy text.</p>		
Mr Robert Arguile	Chair The Putney Society			318	Policy LP13	<p>LP13.A <i>Wandsworth will support the circular economy and contribute towards London's recycling and net self-sufficiency targets by safeguarding existing waste sites and identifying suitable areas for new waste facilities.</i></p> <p><u><a href="#">A circular economy starts long before anything reaches waste sites - see 15.54.below</a></u></p> <p>We applaud the endorsement of the circular economy principle and, going further, would encourage the council to take a fresh approach to the 'Reduce, Reuse, Recycle' policy, changing the emphasis from Recycling as the primary action to Reduce and Reuse as the key first steps in achieving the circular economy.</p> <p>We urge the council to find ways, throughout the borough, to attract specialist retail businesses (such as BYO in Tooting), which adopt the 'Re-use' principle of the circular economy. By encouraging shoppers to bring their own containers to fill from the bulk containers for foods, liquids and other everyday household materials available, not only is plastic, glass and other packaging use reduced but waste is minimised too.</p> <p>Could the council please comment on the issue of food waste, currently not collected separately but going with general Local Authority Collected Waste to incineration?</p> <p>We applaud the council's initiative in organising a 'Skip Day' in autumn 2020, on which large skips, with attendants, were placed in several areas of the borough, for residents to bring household rubbish not suitable for recycling or rubbish bags. These skip sites were hugely successful and welcomed by local people; they helped to reduce fly-tipping, gave local access to people without transport to Waste Disposal Sites, and earned much praise from residents. We urge the council to repeat these events regularly.</p> <p>LP13.F <i>Applications for waste facilities which include additional recycling capacity are welcomed and opportunities to co-locate complementary</i></p>	<p>Support welcome.</p> <p>The role of the Local Plan waste policy is to address requirements for provision of recycling and recovery facilities to meet waste management need within the Borough. Legislation and strategies to prevent waste and reuse materials are being pursued in parallel. An additional paragraph is proposed to signpost this.</p> <p>Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.</p> <p>Cory recently received planning permission for a new Riverside Energy Park which includes a new AD facility which Wandsworth would have the option of sending separately collected food waste to via river barge.</p> <p>A trial weekly food waste collective service for low-rise properties is planned prior to commencement of a new waste collection contract in April 2024 to help inform scoping decisions for that contract.</p> <p>The London Plan Circular Economy Statement requires developers to consider retaining a building before considering demolition.</p> <p>Wandsworth's RRP includes an action to encourage business / organisations to adopt a low waste approach for food and packaging. This includes shoppers bringing their own containers to refill from bulk containers.</p> <p>Support for further Skip Days passed to the Council's Highways Inspection and Enforcement Team.</p>	<p>Additional wording added to supporting text to improve explanation and signposting to what the council is doing to reduce waste and increase recycling.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>activities, such as manufacturing using recycled waste, will be supported. Supported for the reasons above.</p> <p>LP13.J Demolition waste. Retaining existing buildings is to be encouraged.</p>		
Lois Davis	Co-ordinator Wandsworth Green Party			481	Policy LP13	<p>WASTE MANAGEMENT</p> <p>Climate science tells us that we need a dramatic increase in low carbon means of dealing with waste. Recycling plays an important in this by reducing the amount of waste to be dealt with and we commend the intention to support circular economy and contribute towards London's recycling and net self-sufficiency targets outlined in LP13.</p> <p>The London Environment Strategy sets out a pathway to achieving a municipal recycling target of 65 per cent by 2030. The strategy includes London achieving a 50 per cent reduction in food waste and associated packaging waste per person by 2030 and London local authorities needing to provide a minimum level of recycling service, including separate food waste.</p> <p>Wandsworth's recycling level, at 23.2%, is among the lowest in England. LP 13 K requires Circular Economy Statements for all referable applications to set out how the proposed development promotes circular economy outcomes and the aim for net zero waste.</p> <p>We are concerned to see that there are no further provisions to encourage domestic waste recycling. There should be an absolute requirement for all private new builds to provide an adequate and well-designed space for domestic recycling collection at source and we need stricter requirements for developers and architects to include recycling space &amp; design mechanisms into new builds. Tower blocks must also be supplemented with sufficient dumpsters for residents to successfully keep waste and recycling separate and avoid cross-contamination for surplus waste not sent down chutes.</p> <p>We note that 43% black bin waste is food waste and that sending this for incineration, as we currently do, releases far too much CO2 into the atmosphere when it could be returned to the soil. As regards incineration, we believe it has substantial environmental disbenefits. Composting is often a more environmentally friendly alternative.</p> <p>DEFRA asserts that: "Energy from residual waste is only partially renewable due to the presence of fossil based carbon in the waste." We believe energy from residual waste should not be classified as "renewable".</p>	<p>Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.</p> <p>Both the London Plan (policy D6) and Wandsworth's draft Local Plan (LP2 E ) require developers to provide sufficient storage space for the separate collection of dry recyclable, food waste and residual waste. All planning applications will be assessed against these policies. A cross-reference to policy LP2 is already in the supporting text but further signposting is proposed.</p> <p>Energy from waste (recovery) is above landfill in the waste hierarchy and therefore it is considered the better option for managing Wandsworth's residual waste at the present time. There are a number of government initiatives that will help to reduce the amount of waste generated and increase the amount of waste which can be recycled and these are likely to create change in the longer term. For more information on this, the Environmental Services Association has prepared a FAQ document which seeks to address common questions about the role and operation of energy recovery infrastructure in the United Kingdom.</p> <p>In terms of food waste, Cory recently received planning permission for a new Riverside Energy Park which includes a new AD facility which Wandsworth would have the option of sending separately collected food waste to via river barge. A trial weekly food waste collective service for low-rise properties is planned prior to commencement of a new waste collection contract in April 2024 to help inform scoping decisions for that contract.</p>	Changes to the supporting text made to improve explanation and sign-posting to what the council is doing to reduce waste and increase recycling.
Mr David Patterson	Agent Tooting Liberal Democrats			688	Policy LP13	<p>There is not much mention of waste disposal, but this is important if we want to be green. For residents there should be free collection of bulky items at set times in different localities to cut down on flytipping. Also there should be free collection of hazardous waste such as old paint tins or other chemicals which households accumulate.</p>	<p>The role of the Local Plan waste policy is to address requirements for provision of recycling and recovery facilities to meet waste management need within the Borough.</p> <p>As part of its role as a waste collection authority, Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.</p>	An additional paragraph has been added to signpost this.
Monica Tross	Sectary to planning committee Battersea Society			799	Policy LP13	<p>Policies which do put us ahead of the pack and are therefore to be particularly welcome are:</p> <p>LP13 Waste Management</p> <p>K: The requirement for Circular Economy Statements (for all referable applications)</p>	Support welcomed. It is proposed to move clause K to position B in the list.	Clause K has been moved to position B in the list.
Monica Tross	Sectary to planning committee			802	Policy LP13	<p>Areas which fall particularly short taking of meaningful action on climate change include:</p>	<p>The role of the Local Plan is to address requirements for provision of recycling and recovery facilities and ensure new developments include sufficient storage space for the separate collection of dry recyclable, food waste and residual</p>	Improve explanation and sign-posting to what the council is doing to reduce waste and increase recycling.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society					<p>LP13 Waste management</p> <p>Wandsworth has a poor record on recycling with only around 22% of Local Authority Collected Waste being currently recycled when the London Plan sets out a target of 65%. by 2030.</p> <p>While the Local Plan adequately addresses requirements for provision of recycle facilities themselves, there is insufficient provision in the plan to ensure that the proportion of recyclable waste actually reaching these facilities can be increased e.g. through requiring on-site recycle collection facilities in privately owned blocks or adding recycling sections to on-street waste bins. The Council should carry out a study of best practice in other London boroughs and set out a programme designed to achieve the target of 65% within the next nine years.</p>	<p>waste (policy LP2 E). The London Plan also includes a similar policy (D6) and best practice guidance is available for developers. A cross-reference to policy LP2 is already in the supporting text but further signposting is proposed. Other parts of the council have a responsibility to reduce the amount of waste generated and to address recycling rates. Central government legislation is also a key tool to increasing the amount of waste which can be recycled.</p> <p>Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.</p>	
	Labour Group			645	Policy LP13	We ask that para K (Circular Economy Statements) in policy LP13 Waste Management is incorporated in para A so as to underscore the importance of circular economies.	Agreed that the importance of this should be made more apparent in the Policy.	Clause K has now been moved to second in the list.
Hassan Ahmed	GLA			1101	Policy LP13	<p><b>Waste</b></p> <p>The Mayor welcomes Wandsworth's acknowledgment in the draft Local Plan of the waste apportionment targets set out in the PLP (in Table 9.2) for 264,000 tonnes by 2021 and beyond and policy LP13 should clearly set out a commitment to meet those targets.</p> <p>It is welcomed that all waste sites in the borough are to be safeguarded for waste uses which is consistent with policies SI 8 and SI 9 of the PLP. Also welcomed is the policy requirement that 95% of construction and demolition waste be reused, recycled or recovered and so too is the requirement for Circular Economy Statements to accompany all referable planning applications, both of which are in line with Policy SI 7 of the PLP.</p> <p>It is the Mayor's ambition that the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026 as set out in Policy SI 8 of the PLP and the Mayor welcomes Wandsworth's commitment to contribute to this. However, Policy LP13 of the draft Plan identifies an immediate capacity gap in meeting its waste apportionment target. The immediate capacity gap in 2021 is for 44% of the borough's overall waste apportionment target. An equivalent of 2.1ha of land.</p> <p>It is noted that the borough has undertaken a Waste Technical Study (2020) however it is still not clear from the draft Plan how Wandsworth is planning to close the identified capacity gap by 2026 in order to meet the Mayor's net self-sufficiency target. Has the borough done any work to partner with other boroughs that might be able to help meet Wandsworth's shortfall?</p> <p>From paragraph 15.55 of the draft Plan it is understood that the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household waste for Wandsworth. The Waste Management Service Agreement between WRWA and Cory Environmental Ltd to dispose of WRWA waste ends in 2032 which means that the last six years</p> <p>(if the Plan period runs until 2038) of Wandsworth's draft Plan are not accounted for. In addition to that, as set out in paragraph 9.8.3 of the PLP, waste contracts do not recognise administrative boundaries and waste flows across borders. This means that waste management</p> <p>resulting from the contract could happen outside of London which in turn could contribute to London not being self-sufficient in the management of its</p>	<p>Support welcomed.</p> <p>Policy LP13 includes a clear commitment to "contribute towards London's recycling and net self-sufficiency targets". Paragraph 15.59 sets out what this includes and states "Wandsworth will contribute to the emerging London Plan target of net self-sufficiency by 2026 by planning for capacity to manage the borough's waste apportionment targets set out in the emerging London Plan, and the equivalent of 100% of C&amp;D waste arisings, including hazardous waste." Table 15.4 shows Wandsworth's waste needs over the plan period which include the apportionment targets.</p> <p>Land-take is indicative only and not the measure of capacity. This is because different technologies require different amounts of land and it is not possible to know what types of facilities will come forward in Wandsworth. Additional capacity to meet Wandsworth's waste need (Table 15.4) will be measured against baseline existing capacity (Table 15.5).</p> <p>The London Plan policy says: "Development Plans should allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2". This has been done.</p> <p>NPPW states "Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams." This has been done.</p> <p>Wandsworth has a responsibility to plan for and create opportunities for new waste capacity but it cannot build new capacity itself.</p> <p>While there is currently insufficient waste management capacity in Wandsworth to meet the Borough's London Plan apportionment targets, the net self-sufficiency target is by 2026.</p> <p>Unfortunately there is no guarantee that waste operators will choose to locate a facility in Wandsworth. There are a number of issues to consider including high land values, access and transport. This is an issue for many Boroughs, including Wandsworth.</p> <p>Wandsworth is planning to close the capacity gap by identifying suitable areas and waste management facilities to provide the capacity to manage the apportioned tonnages of waste by 2026.</p> <p>Wandsworth explored joint working with the Western Riverside waste planning authorities but LBH&amp;F and OPDC were not willing to pursue this option. Wandsworth asked the GLA for help with this but none was forthcoming.</p> <p>The GLA are confusing Wandsworth's responsibilities for waste disposal with its waste planning responsibilities. The details of the Western Riverside Waste Authority's waste disposal contract does not fall under the remit of London Plan policy.</p>	<p>To ensure clarity about the relationship between net self-sufficiency, apportionment targets and need, additional wording has been added to Policy LP 13.</p> <p>An additional sentence has been added to the supporting text to introduce a response mechanism in the case that waste management capacity to meet the apportionment target has not been achieved by 2026.</p> <p>It is proposed to remove the waste exports table, which is misleading, and modify the supporting text to refer to the tables in the Waste Evidence Base which were used in recent duty to co-operate correspondence and which will form part of Statements of Common Ground with WPAs which receive strategic amounts of Wandsworth's waste.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>waste by 2026. In addition, this type of arrangement means that Wandsworth has less opportunity to move waste management up the waste hierarchy.</p> <p>The draft Plan should demonstrate an ability to meet Wandsworth's apportionment needs in accordance with the PLP requirements. Development Plans should allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 of the PLP. Following the guidance set out in paragraph 9.8.7 Wandsworth should explore opportunities through site allocations to identify suitable sites to manage the borough's waste arisings and meet the apportionment targets set by the Mayor over the plan period.</p> <p>It is not clear from the draft Plan if the borough has capacity to deal with its construction, demolition and excavation (C, D &amp; E) waste arisings over the plan period. In addition, Table 15.7 which sets out the amount of waste exported outside of the borough does not establish how much of its waste is exported outside of London. The proposed approach would jeopardise the Mayor's ambition that London be net self-sufficient in the management of its waste by 2026. Wandsworth is encouraged to form part of a joint waste plan in line with paragraph 9.8.7 of the PLP.</p>	<p>The Local Plan will be reviewed before 2032 and will incorporate any LACW contract details when they are known. WRWA are responsible for LACW waste disposal in Wandsworth and the Local Plan can only include WRWA plans where they are known.</p> <p>London is not aiming for self-sufficiency, but for net self-sufficiency. Management of Wandsworth's waste outside of London does not in itself mean that the Borough or London is not net self-sufficient in waste management capacity. Some of London's waste will always be managed outside of London at specialist facilities which London does not or cannot accommodate, for example asbestos landfill.</p> <p>It should be noted that the West London Boroughs have prepared a West London Waste Plan as waste planning authorities. Separately, the West London Waste Authority has a waste disposal contract which means its residual waste is managed in Avonmouth near Bristol.</p> <p>Wandsworth's draft plan meets the NPPW's requirement to "provide sufficient opportunities to meet the identified needs of the borough" and the London Plan requirement to "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste".</p> <p>No planning policy, including the London Plan, requires Wandsworth to "identify suitable sites to manage the borough's waste arisings and meet the apportionment targets set by the Mayor over the plan period".</p> <p>In Wandsworth, as in most other waste planning authority areas, no individual waste sites were put forward by operators during the plan-making process (in response to a call for sites). Discussions with operators make clear that their preference is for as much flexibility as possible in the identification of land for waste management use, rather than allocation of specific sites that may not be available to them or meet their needs (potentially resulting in the blighting of sites). For these reasons, Wandsworth is not allocating individual sites for waste use, other than those already in waste use. However, areas suitable for new waste facilities have been identified and this approach is therefore in line with PLP policy SI8.</p> <p>Paragraph 15.67 states "There is currently sufficient recycling facilities within the borough to manage the equivalent of 100% of Construction and Demolition (C&amp;D) waste arisings."</p> <p>Wandsworth's Waste Evidence Base establishes how much of its waste is exported outside of London. However, exports are not in themselves a measure of net self-sufficiency. Net self-sufficiency means providing enough waste management capacity to manage the equivalent of the waste need in Wandsworth, while recognising that some imports and exports will continue. Wandsworth's waste need is set out in Table 15.5. An area may have sufficient capacity to meet the equivalent amount of its waste arisings and yet still export and import waste. This is the case in Wandsworth for C&amp;D waste. If there were zero waste imports and exports, this would be self-sufficiency not net self-sufficiency.</p> <p>Not all waste arising in Wandsworth is traceable to its end destination, in particular business waste, and it is therefore not possible to say exactly how much waste is managed in London and how much is managed outside London. This is because the WDI does not always include an origin or destination at planning authority level, but contains origins such as "Central London" and "South London" which may or may not include waste from Wandsworth. Monitoring of waste exports can only be done on a London-wide basis and the GLA is urged to monitor the London Plan waste policies itself.</p> <p>Paras 1.12-1.17 and 6.7 of the Waste Evidence Base sets out the situation with joint waste planning across the Western Riverside Boroughs. It states:</p> <p>[...] The London Borough of Hammersmith &amp; Fulham (LBH&amp;F) and the Old Oak</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>and Park Royal Development Corporation (OPDC) have said they are unable to commit to pooling with the Western Riverside WPAs until further work has been completed. It will be important to stay up to date on this further work and keep informed of any changes to LBH&amp;F's and OPDC's view on joint working.</p> <p>The London Boroughs of Wandsworth and Lambeth and the Royal Borough of Kensington and Chelsea were keen to working jointly with the Western Riverside Boroughs and indeed asked for the GLA's help in brokering a deal, but no assistance was forthcoming. Wandsworth cannot force LBH&amp;F or OPDC to co-operate on joint waste planning. Therefore Wandsworth, as well as Lambeth, are planning for waste independently.</p>	
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1133	Policy LP13	<p>LP13 Waste Management</p> <p>The policy currently states that developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste. The ambition to support a circular economy is welcomed. However, this wording does not provide any flexibility in situations where these figures are not feasible and it is suggested that further flexibility is therefore introduced as follows:</p> <p>LP13 Waste Management</p> <p>J. Developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste unless it is not technically feasible.</p>	<p>London Plan policy SI7.A.5) states that "resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to [...] meet or exceed the targets for each of the following waste and material streams:  a) construction and demolition – 95 per cent reuse/recycling/recovery  b) excavation – 95 per cent beneficial use"</p> <p>Most of Wandsworth's CD&amp;E waste is already being reused, recovered, recycled or put to beneficial use and therefore it is considered technically feasible to do so. Materials that cannot be reused, recovered or recycled, such as asbestos, will fall into the remaining 5% CD&amp;E waste.</p>	No changes considered necessary to the Draft Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1328	Policy LP13	<p>The percentage of recycled collected (22%) and household (23.7%) waste increased to the Mayor target of 65%.</p> <p>We would like clarity on the following: - The differences between collected waste and household waste.</p>	<p>Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022. The RRP's are used to drive and promote local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030. Household waste is waste collected from a residential dwelling, as well as waste from street sweepings, parks, street bins and waste taken to household waste recycling centres.</p> <p>Local Authority Collected Waste (LACW) refers to all waste collected by a Local Authority. This includes household waste, defined above, and any non-household waste collected by the local authority, for example commercial waste.</p>	Comment noted. Improved explanation and sign-posting to what the council is doing to reduce waste and increase recycling. New footnote definition of LACW included.
Michael Atkins	Senior Planning Officer Port of London Authority			1468	Policy LP13	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP13: Waste Management.</p> <p>Support the safeguarding of Cringle Dock and Smugglers Way as safeguarded waste sites in the policy and welcome the reference to the Agent of Change Principle in part C. Also welcome the reference in part D with regard to new waste capacity which supports the use safeguarded wharves and sites which support sustainable transport options such as rail and water.</p>	Support welcomed.	No change
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1367	Policy LP13	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p>Cory Comments</p> <p>Policy LP13 seeks to safeguard existing waste sites and identify new waste facilities in LB Wandsworth which contribute to London's recycling and waste capacity. The importance of this and the role of waste management within Local Plan Policy is heavily support by Cory.</p> <p>Part E of the policy recognises that applications for waste management facilities, including those replacing or expanding existing sites, will be required</p>	<p>Support welcome.</p> <p>Additional sentence on the potential for consolidation of existing waste sites included.</p>	Potential for consolidation of existing waste sites added to Clause E (now H) of the policy and the supporting text

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>to demonstrate that the proposal optimises the waste management capacity of the site.</p> <p>The Council within the Vitaka Report, Wandsworth Local Plan Review: Waste Evidence Base (July 2020) identifies the following Operational waste sites in Wandsworth and their associated throughput over the past 5 years. This approach replicates the New London Plan (Publication Version 2020) Policy SI9.</p> <p><b>See attachment for table</b></p> <p>We can confirm that the above data is correct and representative of the average throughput handled by the sites over the last 5 years.</p> <p>Furthermore, whilst we note that Policy LP13 recognises applications for new waste facilities, the opportunity for consolidating existing waste sites has not been included. We strongly recommend LP13 be amended to contemplate the potential consolidation of existing waste sites within the Borough and the role this could play in meeting future waste management strategies.</p> <p>Part H 'Waste sites will only be released for other uses if compensatory capacity is provided within Wandsworth or, if the borough's waste needs have been met, elsewhere in London. Compensatory provision should be at or above the same level of the waste hierarchy of that which is lost and meet or exceed the maximum achievable throughput of the site over the last five years.'</p> <p>As a strategic waste operator within Wandsworth and wider London, we strongly support this approach in creating the flexibility we require to respond to the ever-evolving waste profile of London. The flexible grow through consolidating or intensifying sites is something we continue to monitor as waste production within the Capital increases.</p> <p>There are also clear urban design benefits which can be identified through the consolidation or intensification such as that identified within the recent Cringle Dock consent. While it is appreciated this scheme has yet to come forward, the process identified clear benefits that could be realised through appropriate site selection and design development.</p>		
Terence Brown	Coordinator Wandsworth Friends of the Earth			1575	Policy LP13	<p><b>LP13 Waste Management</b></p> <p>There are good policies in the section on 'waste management' which might more aptly be entitled 'waste management and recycling', though adherence to the principles of a 'circular economy' would not condone the idea of 'waste' at all.</p> <p>Paragraph J: Should developers not be 'required' rather than 'expected' to comply with the provisions of this paragraph?</p> <p>Paragraphs 15.52 to 15.57 appear to deal mostly with the responsibility of Wandsworth Borough Council to deal with the waste generated in the Borough. It does not deal with <b>provisions for recycling</b> within multi occupancy residential developments or provisions for composting. Certainly on larger developments these provisions should be possible and should be required.</p>	<p>Support welcome.</p> <p>Unfortunately it is not possible to condition and monitor how and where waste is managed from all developments. Large-scale developments which are referred to the GLA will have to produce a Circular Economy Statement which includes this information. Smaller scale developments will not be required to submit this information. However, Wandsworth is also already achieving over 95% recycling or recovery of C&amp;D waste so developers are already choosing this option.</p> <p>Both the London Plan (policy D6) and Wandsworth's draft Local Plan (LP2 E ) require developers to provide sufficient storage space for the separate collection of dry recyclable, food waste and residual waste. All planning applications will be assessed against these policies. A cross-reference to policy LP2 is already in the supporting text but further signposting is proposed.</p>	<p>Title of policy expanded to capture the importance of the circular economy and recycling. Improved explanation and signposting to what the council is doing to reduce waste and increase recycling.</p>
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1731	Policy LP13	<p>LP13 Waste Management</p> <p>The policy currently states that developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste. The ambition to support a circular economy is welcomed. However, this wording does not provide any</p>	<p>London Plan policy SI7.A.5) states that "resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to [...] meet or exceed the targets for each of the following waste and material streams:                      a) construction and demolition – 95 per cent reuse/recycling/recovery                      b) excavation – 95 per cent beneficial use"</p> <p>Most of Wandsworth's CD&amp;E waste is already being reused, recovered, recycled</p>	<p>No changes considered necessary to the Local Plan</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>flexibility in situations where these figures are not feasible and it is suggested that further flexibility is therefore introduced as follows:</p> <p>LP13 Waste Management</p> <p>J. Developers will be expected to reuse, recycle or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste <u>unless it is not technically feasible.</u></p>	<p>or put to beneficial use and therefore it is considered technically feasible to do so. Materials that cannot be reused, recovered or recycled, such as asbestos, will fall into the remaining 5% CD&amp;E waste.</p>	
Rachel Holmes	Planning Advisor Environment Agency			1639	Policy LP13	<p>See attachments on 1615 for more detail</p> <p><b>Pollution and Waste</b></p> <p>Safeguarded waste sites</p> <p>The table in Part 3 of proposed policy LP13 'Waste Management' fails to mention the following permitted waste sites as being safeguarded:</p> <ol style="list-style-type: none"> <li>1. Feathers Wharf, Wandsworth Town (non-operational waste transfer station)</li> <li>2. Day Aggregates, Battersea (operational waste transfer station)</li> <li>3. Frogmore Depot, Wandsworth Town (operational hazardous waste transfer station)</li> </ol> <p>Please note that Frogmore Depot is a Wandsworth Local Authority site with a waste permit.</p> <p>Please confirm whether these sites have been overlooked or whether they have purposefully not been regarded as safeguarded.</p> <p>Additionally, D. Goldsmith has been listed as a safeguarded site however the site has been non-operational for a number of years. The company D. Goldsmith has been liquidated and as such the permit in the company's name no longer exists. Please review whether this site should be safeguarded.</p> <p>Recommended action: review the list of safeguarded waste sites in the borough within LP13 'Waste Management'.</p> <p>Enclosing waste sites</p> <p>Policy LP13 'Waste Management' Part G ensures new waste facilities will be assessed against criteria in National, Regional and Local Plan policies. We would encourage this to include the specific requirement for new waste sites to be enclosed, as stipulated in Part D4 Policy S18 'Waste and Capacity and Net Waste Self Sufficiency' of the emerging London Plan. This has multiple benefits for reducing noise, sound and air quality pollution.</p> <p>Recommended action: include requirement for all new waste facilities to be fully enclosed.</p>	<p>Further information was sought from the operator where the details of the facility were not clear from the publicly available data.</p> <ol style="list-style-type: none"> <li>1. Permission was granted for a temporary waste transfer station at Feathers Wharf adjacent to the WRWA/Cory facility in Smuggler's Way to deal with the Waste Authority's bulky waste. The facility has permission until 31st December 2032. While temporary transfer facilities are usually for excavation wastes resulting from engineering projects, they are not generally safeguarded for waste use in the future. London Plan policy SI8.E.4) requires waste sites to be fully enclosed where it is likely to produce significant air quality, dust or noise impacts. The London Plan forms part of Wandsworth's Development Plan and any proposal for a new waste facility will be assessed against policies in both the London Plan and Wandsworth's Local Plan. Clause G of LP13 makes this clear, stating "Applications for new waste facilities will be assessed against criteria in the National Planning Policy for Waste, the emerging London Plan and Wandsworth's Local Plan policies". It is not necessary to repeat London Plan policies in Wandsworth's Local plan, however the policy will be signposted in a new paragraph (see below).</li> <li>2. The waste planning consultant spoke to Day Aggregates who confirmed that no waste management is taking place on the site. Therefore the site is not being put forward for safeguarding.</li> <li>3. The waste planning consultant spoke to Wandsworth who confirmed that no waste management is taking place at Frogmore Depot. Therefore the site is not being put forward for safeguarding. Also part of a larger regeneration scheme and is allocated for mixed use development.</li> </ol> <p>The list of safeguarded waste sites was compiled using publicly available data from the Environment Agency. This includes the Waste Data Interrogator and Environmental Permitting Regulations – Waste Operations Register. Further information was also sought from the operator where the details of the facility were not clear from the publicly available data. This resulted in two sites (Days Aggregates and Frogmore Depot) being removed from the list of existing sites.</p> <p>The D. Goldsmith site is currently vacant and the most recent use is for tyre storage and disposal. As there is no extant environmental permit for a waste use, this site no longer meets the definition for a waste site set out in London Plan paragraph 9.9.1 "land with planning permission for a waste use or a permit from the Environment Agency for a waste use". It is proposed to remove this site from the list of safeguarded waste sites.</p> <p>London Plan policy SI8.E.4) requires waste sites to be fully enclosed where it is likely to produce significant air quality, dust or noise impacts. The London Plan forms part of Wandsworth's Development Plan and any proposal for a new waste facility will be assessed against policies in both the London Plan and Wandsworth's Local Plan. Clause G of LP13 makes this clear, stating "Applications for new waste facilities will be assessed against criteria in the National Planning Policy for Waste, the emerging London Plan and Wandsworth's Local Plan policies". It is not necessary to repeat London Plan policies in Wandsworth's Local plan, however the policy will be signposted in a new paragraph.</p>	<p>Additional paragraph added to the supporting text of LP 13 to address enclosure comment.</p> <p>Remove D. Goldsmith from the list of safeguarded waste sites in Policy LP13. Update Waste Evidence Base.</p>
Michael Leigh				44	Policy LP14	<p>As a long-time Wandsworth resident, the connected problems of traffic and poor air quality are a great concern. I was therefore interested to read in the draft report of the recent 30% decline in car registrations held by those living in the borough. Presumably, there has been no such decline in through</p>	<p>Comment noted. The Council is committed to improving air quality in the borough. The Council has produced a draft Air Quality Action plan for 2021 - 2026. The Council continues to put in place practical measures to get people out their cars; Wandsworth was on the of the first boroughs to embrace car</p>	<p>No changes to the Local Plan are considered necessary</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						traffic? However, it was noticeable during the first lockdown that as traffic on the A3 dropped, the air quality improved. I would implore the Council to tackle air quality (and through traffic) with all the means at its disposal as part of its agenda on climate change and I am pleased to see that this commitment already features in the report. Air quality on the A3, Putney High Street and Wandsworth Town centre are dangerous as well as being unpleasant and a significant deterrent to cyclists and pedestrians.	clubs, sought to make walking and cycling in the busy borough safer, and have been ambitious in extending the network of electric charging points across the borough. The Draft Local Plan refers to the Air Quality Action plan and also has policies on sustainable transport LP51 and LP54 on public transport and infrastructure which seeks to promote and ensure transport functions are secured which allows takes some pressure of car usage.	
Emma Broadbent	London Rivers Officer South East Rivers Trust			262	Policy LP14	Light pollution is mentioned in section 15.80 of the plan and associated policy <b>LP14</b> , G. The document recognises the impact of artificial lighting on other occupiers and residents but fails to recognise the significant detrimental impact that artificial lighting can have on wildlife and river corridors	Agreed, the importance of wildlife and river corridors should be reflected within the policy	Changes to LP14 have been made to account for the impact of light pollution on the natural environment
Mr Robert Arguile	Chair The Putney Society			320	Policy LP14	LP14.C Define 'Air Quality Neutral' or say where it is defined if you want to enforce this.  LP14.D.4 'such as' or 'including'? This wording is too weak.  LP14.G 'unacceptable' is not defined, so unenforceable.	Paragraph 15.76 sets out where further guidance and requirements of the GLA and London Plan policies should be taken into account regarding Air Quality Neutral.	No changes to the Local Plan are considered necessary
Lois Davis	Co-ordinator Wandsworth Green Party			459	Policy LP14	We welcome the fact that the Strategic Context, Vision and Objectives acknowledge that Air Quality is a significant issue and we agree and endorse the ambition to reduce the need to travel by car since vehicle emissions are a main contributor to air pollution. We also welcome the Council's promotion of "air quality positive" design in line with the emerging London Plan Policy SI 1 as outlined in LP14 C.  We commend LP14 D 4 – "Strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors." However more clarity on how these mitigation requirements differ from standard "air quality positive" requirements is needed as is clarity on the definition of sensitive receptors.  We are also pleased to see the Council's aspirations towards 15-minute neighbourhoods and the air quality and health benefits they can bring.  We are concerned that inconsistency between height regulations referred to in the Air Quality section and those given in Area Plans indicate a lack of understanding of the height impact of tall buildings and the canyon effect.  We would like to see measures to ensure borough-wide safe levels for all toxins as advocated by the World Health Organisation.	In this context, a sensitive receptor is a location where members of the public might be regularly exposed to poor air quality i.e. residential property, school, hospital, care home (including grounds). Any new development proposed in an area of existing poor air quality should begin with a 'better by design' approach to design-out or reduce as far as practicable exposure to poor air quality. Examples include but not limited to: Maximise distance of building facade from pollution source. Locate sensitive end uses furthest away from pollution sources. Install robust fencing/planting to shield outdoor areas from pollutant egress. Where mitigation is required to protect end users from existing poor air quality these should be considered on a case-by-case basis in the supporting air quality assessment. As part of the boroughs new Air quality Action Plan there is an aspiration to develop a new Supplementary Planning Document specifically aimed specifically at Air Quality. This will be consulted upon and will help to provide detailed guidance to developers around air quality assessments / air quality neutral / air quality positive requirements and mitigation / exposure reduction.	No changes to the Local Plan are considered necessary
Mr David Patterson	Agent Tooting Liberal Democrats			691	Policy LP14	I can see no mention of wood burning stoves. As these can cause air pollution inspection of output from these should be carried out.	Comment noted. The boroughs new Air Quality Action Plan will cover aspects and controls that the Council can take to address the contribution to pollution in the borough.	No changes to the Local Plan are considered necessary
Josephine Vos	Transport for London			735	Policy LP14	The contribution of reduced car use to improving air and noise pollution should be mentioned. Providing zero or limited car parking at new developments can help to manage and mitigate the impacts of new development.  TfL welcomes the application of the Agent of Change principle, which is relevant to development adjacent to, or linked with, transport infrastructure.	Agreed, wording to be added to paragraph 15.74 to refer to LP53 Parking, Servicing, and Car Free Development and the contribution of reduced car use on air and noise pollution	Changes to LP14 Air Quality have been made to take account of the comments regarding car use and air and noise pollution.
Hassan Ahmed Hassan Ahmed	GLA			1118	Policy LP14	<b>Air quality</b>  The Mayor welcomes Wandsworth's intention to promote air quality neutral development. It is one of the Mayor's commitments that air quality in London is improved so that it is the best of any major city in the world. There are seven Air Quality Focus Areas (AQFAs) that lie within Wandsworth and in accordance with Policy SI 1B of the PLP the borough should plan for these.	Comment noted. Wandsworth is committed to promoting air quality improvements within the borough and has produced an Air Quality Action Plan (previous plan has been referred to in 15.72) 2021 - 2026, within this the AQFAs have been identified. The Local Plan needs updating regarding the dates of the new AQAP.	Update Local Plan LP10 with the new dates of the AQAP



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Reference to the borough's AQFAs is welcome in paragraph 15.72 and perhaps Wandsworth should consider setting out the requirements for proposals within or close to those areas within the body of a policy and identify them clearly on maps. The Mayor is pleased that Policy SI 1 of the PLP which addresses air quality is reflected in Wandsworth's draft Plan.		
Covent Garden Market Authority		Mr Philip Robin	Consultant Jones Lang Lasalle	1113	Policy LP14	Policy LP14  CGMA notes and welcomes Policy LP14 part F3 recognition that measures to protect the occupiers from existing noise sources will be required. As a major land use in the Nine Elms area, where significant amounts of new residential development is coming forward close the market, explanatory text should be added to note the main operating activities of the wholesale market take place during the night and are industrial in nature and therefore inevitably will lead to some impact on surrounding land uses, and therefore residential developments in the vicinity of NCGM should incorporate measures to ensure they are protected from activities taking place at the wholesale market. The market has operated at Nine Elms for 50 years and its future should not be undermined or restricted by developments now taking place in the vicinity.	The background text refers to the Agent of Change policy within the Local Plan and this is considered adequate.	No changes are considered necessary to the Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1326	Policy LP14	A plan with key measurable outcomes on how Nitrogen dioxide and particle matter to ensure residents across Wandsworth are not exposed to dangerous levels of NO2 / particulate matter as referenced by the WHO by 2030.	The Council is committed to ensuring air quality improves within Wandsworth and is producing an Air Quality Action Plan 2021 in recognition of the legal requirement on Local Authorities to work towards air quality objectives under Part iv of the Environment Act 1995. The AQAP is cross referenced within LP 14.	No changes are considered necessary to the Local Plan
Michael Atkins	Senior Planning Officer Port of London Authority			1469	Policy LP14	<b>See the attachment on comment 1441 the representation for context</b>  - Policy LP14: Air Quality, Pollution and Managing Impacts of Development.  Support part F3 and supporting paragraph 15.79 of the policy, which includes a reference to the need to protect the occupiers of new developments from existing sources, without harming the successful continued operation of existing uses in line with the Agent of Change principle. As noted previously this is also of importance for development proposals located in close proximity to the boroughs safeguarded wharves which should be referenced here. In addition it is recommended that reference is made in the policy that as part of the need to ensure appropriate noise assessments are completed, consideration is given to the need to complete day and night time assessments to capture 24 hour operations, and ensure such noise assessments are completed in co-operation with the adjacent operators of existing uses, to ensure assessments have captured typical operations which take place on adjacent sites. This will allow for development proposals to be designed to minimise the potential for conflicts of use and set out any, if required mitigation measures to protect both future occupiers, but also existing businesses and operators.	Comment noted. Changes to LP14 will reflect the comments made regarding capturing noise assessments.	Wording added to LP14 to reflect need for appropriate noise assessments which capture typical operations on adjacent sites
Diana McCann	Boroughs Coordinator The Blue Green Economy			1434	Policy LP14	<b>LP14 Air Quality, Pollution and Managing Impacts of Development</b>  Point D4. Detailed assessment for strict mitigation measures can require consideration of advanced computational techniques, such as computational fluid dynamics (CFD), where limitations in traditional (Gaussian) techniques render detailed design improvement assessments impossible.	Comment noted.	No change considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1576	Policy LP14	<b>LP14 Air Quality, Pollution and Managing Impacts of Development</b>  The policies that seek to mitigate the deterioration of air quality aim to address this headline issue for the Borough in so far as new development might have an impact.  Should the Council bring in provisions to restrain uses that involve predominantly young, old or vulnerable occupants from occupying development sites adjacent primary air polluting sources that are unlikely to be mitigated any time soon such as major roads?	Comment noted. As part of the new Air Quality Action Plan and a new Air Quality Supplementary Planning Document will be created and consulted upon to provide detailed guidance to developers around air quality assessments / air quality neutral / air quality positive requirements and mitigation / exposure reduction. As part of the new AQAP in the 'Protecting the Vulnerable' section, pollution close to existing schools, care homes and hospitals will be dealt with through an audit process. Comment noted regarding LED lights and passed to transport team.	No change considered necessary

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Paragraph G on light pollution is welcome. However, the Council's own street lighting could be regarded as a major source of light pollution. The replacement of low pressure sodium lighting by LED lighting has (subjectively at any rate) raised the brightness of streets at night time from a perfectly adequate level to one that seems unnecessarily high. Other boroughs I believe (Merton?) have installed LED lights which can be reduced or dimmed during certain night time hours. This needs to be considered not only with respect to human comfort but with respect to urban wildlife.		
Rachel Holmes	Planning Advisor Environment Agency			1640	Policy LP14	<p>See attachments on 1615 for more detail</p> <p><i>Policy LP14 'Air Quality, Pollution and Managing Impacts of Development'</i></p> <p>We have the following comments to make in relation to:</p> <ul style="list-style-type: none"> <li>D3 'Air Quality' which states 'To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required... Measures and appropriate design to protect the occupiers of new developments, and in particular vulnerable people and users such as children and the elderly, from existing sources.'</li> <li>F3 'Noise and Vibration' which states 'Measures to protect the occupiers of new developments from existing sources, without harming the successful continued operation of existing uses in line with the Agent of Change principle set out in the emerging London Plan Policy D13.'</li> </ul> <p>The above wording appears to imply that developers have a responsibility to protect occupiers from existing sources of poor air quality and excessive noise. As waste sites can often be sources of poor air quality and excessive noise we strongly encourage this position. We would however like this to be expanded upon to include more details on developer's requirements and for waste sites specifically to be mentioned.</p> <p>The Environment Agency is having to respond to an increasing number of complaints surrounding poor air quality (usually dust) and noise at safeguarded waste sites throughout London from occupiers of new developments which have been constructed near to these existing sites. Whilst there is often a requirement for poor air quality and excessive noise to be mitigated by the operators of these sites, sometimes it is not possible to mitigate to the point of eradicating the problem. Furthermore if the Environment Agency continues to encounter poor air quality and excessive noise at waste sites located near to new developments, then in extreme examples enforcement action might become the only course of action which can be taken. Enforcement action could subsequently affect the long term future of safeguarded sites as waste permits might have to be suspended or revoked. Requiring developers to incorporate designs which mitigate poor air quality (dust) and noise would therefore be beneficial for both occupiers and existing waste sites and would reduce the regulatory load on the Environment Agency as well as related Local Authority teams.</p> <p>Recommended action: specifically mention waste sites within this policy. Add further details about the level of responsibility on developers of new sites near existing waste sites about what measures they are expected to implement to mitigate for poor air quality, noise and vibrations.</p>	<p>LP13 'Waste Management' already includes an 'agent of change' clause C. which states "Development on sites adjacent to existing waste sites that may prejudice use for waste management purposes will not be permitted unless satisfactory mitigation measures can be provided, in line with the Agent of Change principle."</p> <p>An additional sentence in the supporting text to signpost LP14, F3 and D3 will be added.</p>	An additional sentence in the supporting text to signpost LP14, F3 and D3 has been added.

## Chapter 16 - Providing for Wandsworth's People

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mrs Michelle Praest				153	General Providing for Wandsworth's People	<p>I believe that Wandsworth council needs to do more to maintain and extend the provision available in playgrounds. I also believe that play spaces should be included in the section Achieving Design Excellence. The council says "will seek to secure a local environment which promotes physical activity and mental wellbeing through new development, and seek to improve people's economic, social and environment conditions"</p> <p>What investment have you made to the playground in Wandsworth park? Yes, I've seen the three new items however what is the choice and placement based on? What consultation if any did you do?</p> <p>Is it possible for Wandsworth park playground to be expanded with greater variety of play equipment to support and promote physical activity? Especially at this time play spaces for children are essential and more can be done to improve these spaces.</p> <p>New developments....???? All that industrial estate space is bought and sold and now being built up by Taylor Wimpey. I saw Pocket park playground and it is a welcome addition but the choice of equipment could include more to support children with SEN.</p> <p>Also I would question the commitment to Achieving Design Excellence. You only sell that valuable spacious land once and now it's gone. Are you happy when you walk around there? Is it an area of inspiration and design excellence?</p> <p>I also saw the strip of land left by the River Wandle for a narrow, barren play area.</p> <p>Is there any pressure on Taylor Wimpey to carve out greater play spaces? If not then why not? Where is the big play space? Large fort or wooden pirate ship inspired style climbing frame?</p> <p>I saw the hoarding with children's artwork, if that is the extent of community engagement then it's disappointing. Where is the money and investment into improving play spaces, providing sizeable land for play spaces or actually providing and supporting business that would promote health and well being. Why can't we have a skating rink? A skate park like at Kimber Road.</p> <p>So much more could be done to improve the outdoor spaces for children. Big developers should be asked to front up money to improve local playgrounds. Real, tangible community engagement and improvement must be considered to provide outdoor spaces for children, teenagers, the elderly.. anyone.</p>	<p>The Council has produced an Open Space Study which has assessed all the play spaces in the borough. LP19 Play Space and the Planning Obligations SPD set out how much play space new developments will be required to provide. Play Space is also informed by the Mayor of London Shaping Neighbourhoods: Play and Informal Recreation report which considers the different sensory needs of children.</p> <p>Consultation for parks and play equipment is handled by the Development Management Team and Enable Leisure and Culture and is not within the remit of the Local Plan.</p> <p>The details of the Taylor Wimpey development are not within the remit of the Local Plan.</p>	No changes to the Local Plan are considered necessary.
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	418	General Providing for Wandsworth's People	<p>We have considered proposed Policy LP15Part B—Health and Wellbeing—with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date. 1.2 Within these broad points we have the following policy objections to draft Policy LP15Part B:</p> <p>A.The 400m exclusion zone is inconsistent with national planning policy</p>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>B. The policy is inconsistent, discriminatory and disproportionate.</p> <p>C. Examination of other plans have found similar policy approaches to be unsound.</p> <p>D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.1.3 In summary, Planware Ltd consider there is no sound justification for a policy such as Policy Policy LP15 Part B Point 2, which imposes restrictions on restaurants that include an element of hot food takeaway. The policy is unclear as it does not specify what constitutes an "over concentration". 1.4However, as stated in the opening paragraph, Planware Ltd supports the aim of promoting healthier living and tackling the obesity crisis. We acknowledge that planning can have a role in furthering these objectives. We would therefore welcome and support any studies between obesity and their relationship with development proposals, including examination of how new development can best support healthier lifestyles and tackling the obesity crisis. When a cogent evidence base has been assembled, this can then inform an any appropriate policy response. This has still not emerged.</p> <p>1.5Given the lack of any clear agreement between experts on the indices of obesity or poor health, analysing the evidence is a necessary part of this objection by way of background. This will all be highlighted in the below text.</p>		
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	420	General Providing for Wandsworth's People	<p>See attached</p> <p>2.19 Those specifically wanting a meal low in either fat, salt, or sugar, can tailor their choices accordingly. Any combination of menu items sold at McDonald's can be eaten as part of a calorie controlled nutritionally balanced diet. Customers alternatively eat anything from the menu allowing for this within their overall daily, or weekly nutritional requirements.</p> <p><b>Quality of Ingredients and Cooking Methods</b></p> <p>2.20McDonald'sare always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from 100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald's want their customers to be assured about what they are consuming. The 'Good to Know' section on our website -<a href="https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html">https://www.mcdonalds.com/gb/en-gb/good-to-know/about-our-food.html</a>-provides a range of information about their processes and where produce is sourced from.</p> <p><b>Menu Improvement and Reformulation</b></p> <p>2.21McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below.</p> <p>2.22In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu.</p> <ul style="list-style-type: none"> <li>•89% of their core food and drink menu now contains less than 500 kcals.</li> <li>•Supersize options were removed from their menu in 2004;</li> <li>•72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model;</li> <li>•Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z);</li> </ul>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>•Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk;</p> <p>•Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost;</p> <p>•In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal.</p> <p><b>Fat</b></p> <p>2.23 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).</p> <p>2.24However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.</p> <p>2.25What have McDonald's done?</p> <p>•Reduced the saturated fat content of the cooking oil by 83%;</p> <p>•Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal";</p> <p>•The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible;</p> <p>•They have completely removed hydrogenated fats from the vegetable oils;</p> <p>•Reduced the total fat in the milkshakes by 32% per serving since 2010;</p> <p>•Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants.</p> <p><b>Sugar</b></p> <p>2.26 Dietary carbohydrates include sugars, starches and fibre, and each has approximately 4kcal/g.</p> <p>2.27 The Scientific Advisory Commission on Nutrition (SACN) currently recommends that approximately 50% of total dietary energy intake should be from carbohydrates (SACN Report, 2015). In 2015 SACN recommended that the dietary reference value for fibre intake in adults be increased to 30g/day (proportionally lower in children) and that the average intake of "free sugars" (what used to be referred to as non-milk extrinsic sugars) should not exceed 5% of total dietary energy, which was in keeping with the World Health Organisation (WHO) recommendations.</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2.28 Current average intake of free sugars far exceeds current recommendations, and excess intake is associated with dental issues and excess calorie intake which can lead to weight gain and obesity.</p> <p>2.29 Over the last 10 years our reformulation work has resulted in 787 tonnes less sugar across our menu in 2017 versus 2007. What have McDonald's done?</p> <ul style="list-style-type: none"> <li>• Reducing the sugar in our promotional buns, this removed 0.6 tonnes of sugar</li> <li>• Their Sweet Chilli Sauce has been reformulated to reduce sugar by 14% this equates to 155 tonnes of sugar removed</li> <li>• Their Festive Dip has removed 4 tonnes of sugar</li> <li>• Their famous McChicken Sandwich Sauce has reduced in sugar 45%</li> <li>• Their Tomato Ketchup has reduced in sugar by 20% which equates to 544 tonnes of sugar removed from the system</li> <li>• Their Chucky Salsa has reduced in sugar by 28%</li> <li>• Since 2016 they have reduced the sugar content of Fanta by 54%</li> <li>• The Toffee Syrup in their Toffee Latte has been reformulated to remove 20% of the sugar</li> <li>• McDonald's have also reformulated their Frozen Strawberry Lemonade this has led to 8% sugar reduction per drink</li> </ul> <p><b>Salt</b></p> <p>2.30 A number of health-related conditions are caused by, or exacerbated by, a high salt diet. The strongest evidence links high salt intake to hypertension, stroke and heart disease, although it is also linked with kidney disease, obesity and stomach cancer (Action on Salt website).</p> <p>2.31 Salt is often added to food for either taste or as a preservative, and in small quantities it can be useful. Adults in the UK are advised not to exceed 6g of salt per day, but the average intake at a population level is consistently higher than this.</p> <p>2.32 Salt does not directly lead to obesity; however, it does lead to increased thirst, and not everyone drinks water or calorie-free "diet" beverages. If our thirst increases and leads to increased consumption of calories from extra fluid intake, then this may lead to increased weight and obesity. 31% of fluid drunk by 4-18-year-old children is sugary soft drinks (He FJ et al, 2008), which has been shown to be related to childhood obesity (Ludwig DS et al, 2001).</p> <p>2.33 What have McDonald's done?</p> <ul style="list-style-type: none"> <li>• The salt content across the UK menu has been reduced by nearly 35% since 2005;</li> <li>• Customers can ask for their fries to be unsalted;</li> <li>• The salt added to a medium portion of fries has been reduced by 17% since 2003;</li> </ul>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>•The average Happy Meal now contains 19% less salt than in 2006</p> <p>•Chicken McNuggets contain 52% less salt than in 2003.</p> <p>2.34The process continues. McDonald's have recently made the following changes to further improve their menu</p> <p>•Making water the default drink in the Happy Meals;</p> <p>•Making it easier for people to understand the existence of a wide range of under 400 and 600 calorie meal options that are available.</p> <p><b>Third Party Opinions of McDonald's</b></p> <p>2.35McDonald's regularly receive supportive comments from independent third parties.</p> <p>2.36Professor Chris Elliott, of the Department for Environment, Food &amp; Rural Affairs' independent Elliott Review into the integrity and assurance of food supply networks: interim report, December 2013:</p> <p>"Each supply chain is unique, showing that there is no single approach to assuring supply chain integrity. The review has seen many examples of good industry practice that give cause for optimism. There is not space within this final report to reference all the good industry practices but those that have stood out include McDonald's and Morrisons."</p> <p>2.37Jamie Oliver, the TV chef, food writer and campaigner speaking in January 2016 at the Andre Simon Food &amp; Drink Book Awards to the Press Association:</p> <p>"Everyone always liked to poke at McDonald's. McDonald's has been doing more than most mid and small-sized businesses for the last 10 years. Fact. But no one wants to talk about it. And I don't work for them. I'm just saying they've been doing it -100% organic milk, free range eggs, looking at their British and Irish beef."</p> <p>2.38Raymond Blanc, the TV chef and food writer, speaking in 2014, after having presented McDonald's UK with the Sustainable Restaurant Association's Sustainability Hero award:</p> <p>"I was amazed. All their eggs are free-range; all their pork is free-range; all their beef is free-range.</p> <p>"[They show that] the fast-food business could change for the better. They're supporting thousands of British farms and saving energy and waste by doing so.</p> <p>"I was as excited as if you had told me there were 20 new three-star Michelin restaurants in London or Manchester."</p> <p>2.39 Marco Pierre White, TV chef and food writer, speaking in 2007:</p> <p>"McDonald's offers better food than most restaurants and the general criticism of the company is very unfair.</p> <p>"Their eggs are free range and the beef is from Ireland, but you never hear about that. You have to look at whether restaurants offer value for money, and they offer excellent value."</p> <p>These comments below represent independent opinions</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>Supporting Active and Healthy Lifestyles among Employees and Local Communities</b></p> <p>2.40 McDonald's is focused on its people and is proud to have been recognised for being a great employer. For example:</p> <p>Great Place to Work 2017 'Best Workplaces' –McDonald's are ranked 4th on the Great Place to Work 2017 'Best Workplaces' list (large organisation). This is our 11th year on the list.</p> <ul style="list-style-type: none"> <li>•The Sunday Times Best Company to Work for List 2017 -we have made The Sunday Times 30 Best Big Companies to Work for list for the seventh consecutive year, achieving 6th position.</li> <li>•Workingmums.co.uk Employer Awards 2017-Innovation in Flexible Working -in November 2017, we were awarded the Top Employer for Innovation in Flexible Working by workingmums.co.uk. The judges specifically recognised our approach to Guaranteed Hours contracts.</li> <li>•The Times Top 100 Graduate Employers -the Times Top 100 Graduate Employers is the definitive annual guide to Britain's most sought after employers of graduates.</li> <li>•Investors in People Gold -Investors in People accreditation means we join a community of over 15,000 organisations across 75 countries worldwide and it is recognised as the sign of a great employer.</li> <li>•School leavers Top 100 Employers -McDonald's UK has been certified as one of Britain's most popular employers for school leavers in 2017, for the third consecutive year. An award voted for by 15-18 year olds in the UK.</li> </ul> <p>2.41 In April 2017, McDonald's began to offer employees the choice between flexible or fixed contracts with minimum guaranteed hours. This followed trials in 23 restaurants across the country in a combination of company owned and franchised restaurants. All of their employees have been offered this choice and around 80% have selected to stay on flexible contracts.</p> <p>2.42Over the past 15 years, McDonald's has been proud partners with the four UK football associations: The English Football Association; The Scottish Football Association; The Football Association of Wales; and The Irish Football Association.</p> <p>2.43This partnership has seen them support over one million players and volunteers. In London since 2014, more than 1,000 people have attended their Community Football Days and have distributed 3,328 kits to accredited teams in the Capital. Of the 171 McDonald's restaurants within the M25, approximately 88 are twinned and actively supporting a local football club. This serves as an example of the company's willingness to confront the obesity crisis by a multitude of different approaches.</p> <p>2.44McDonald's do this work because increasing standards will ultimately create a better experience for young footballers, leading to increased participation and retention of children and young people in sport.</p> <p>2.45 Their Community Football programme helps to increase participation at all levels. McDonald's remain absolutely committed to it and are in the final stages of planning a new programme for future years.</p> <p><b>Marketing</b></p>		



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2.46 As a business, McDonald's are committed to ensuring their marketing will continue to be responsible and will be used as a positive influence to help our customers make more informed choices.</p> <p>2.47 McDonald's recognise that marketing has a part to play in influencing customers' choices. They comply, and go beyond, the UK's stringent regulations on marketing to children and use their marketing to help families understand more about the range of food options they have to offer.</p> <p>2.48 McDonald's never market products classified as high in fat, salt or sugar to children in any media channel, at any time of the day. They are committed to ensuring that marketing is always responsible as well as informative, and that it reinforces positive food messages.</p> <p>2.49 In addition, they go beyond the regulations in a lot of cases. For example, when advertising a Happy Meal, they only ever do so with items such as carrot sticks, a fruit bag, milk or water to ensure McDonald's are not marketing HFSS food to children. This has been done voluntarily since 2007.</p> <p><b>Summary</b></p> <p>2.50 In the light of the above it is clear that McDonald's restaurants offer the district considerable and substantial economic benefits, are supportive of active and healthy lifestyles. They also enable customers to make informed, healthy decisions from the wide-ranging menu options available. It is important that this is acknowledged, given the assumption in proposed Policy LP15, that hot food takeaway uses should be restricted within 400m of a school. Given the policy aim – which McDonald's supports – of promoting healthier lifestyles and tackling obesity, other alternatives would be more effective than restrictions in school areas, which in turn will have negative land use consequences.</p> <p>2.51 We turn now to the main points of the objection.</p>		
Susie Morrow	Chair Wandsworth Living Streets			660	General Providing for Wandsworth's People	<p>3. Technology &amp; Data</p> <p>We would like to see a section within the dLP which explicitly references the use of existing, new and emerging technologies to improve the Borough's buildings and places, and the use of data to inform better choices and decision making. "Smart Growth" and first-class local engagement can only be achieved through relevant and pertinent information. This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>• District heating networks (incl. elimination of gas combustion where possible)</li> <li>• Micro power/electricity generation including wind, solar and battery storage</li> <li>• Heat reclamation from waste hot water</li> <li>• AI-based technologies for determining movement strategies around new sites (incl. people &amp; vehicle movements)</li> <li>• Ensuring all developers are using Building Information Modelling, concepts such as "Digital Twins" and using video CGIs to improve engagement and consultation</li> <li>• Construction traffic &amp; supply chain – use of aggregated data across sites to enable more efficient logistical solutions across the Borough</li> </ul> <p>Waste management – developing solutions to enable residents of new and legacy housing stock to understand their refuse/waste volumes</p>	The latest technology is encouraged and is already being used in the planning process to inform an application.	No changes considered necessary for the Local Plan.
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	985	General Providing for Wandsworth's People	<p>Please see attachment</p> <p>Quality of Ingredients and Cooking Methods</p> <p>2.20 McDonald's are always transparent about both their ingredients and their processes and strive to achieve quality. Their chicken nuggets are made from</p>	Comment noted.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>100% chicken breast meat, burgers are made from whole cuts of British and Irish beef. Coffee is fair trade and their milk is organic. McDonald's want their customers to be assured about what they are consuming. The 'Good to Know' section on our website - <a href="https://www.mcdonalds.com/gb/en-gb/good-to-know/about[1]our-food.html">https://www.mcdonalds.com/gb/en-gb/good-to-know/about[1]our-food.html</a> - provides a range of information about their processes and where produce is sourced from. Objection Response to Wandsworth Draft Local Plan Planware LTD on behalf of McDonald's Restaurants LTD 5 Friday, 26 February 2021 Menu Improvement and Reformulation</p> <p>2.21 McDonald's is actively and continuously engaged in menu reformulation to give customers a range of healthier options. Louise Hickmott, Head of Nutrition, at McDonald's UK, has provided a letter giving examples of the steps that have been taken in recent years. The information is summarised below.</p> <p>2.22 In recent years McDonald's has made great efforts to reduce fat, salt and sugar content across their menu. • 89% of their core food and drink menu now contains less than 500 kcals. • Supersize options were removed from their menu in 2004; • 72% of the Happy Meal menus are classified as not high in fat, salt or sugar according to the Government's nutrient profile model; • Since October 2015, 50% of the options on the drinks fountain have been no added sugar (Diet Coke, Coke Zero and Sprite Z); • Recent years have seen the introduction of new items, offering more choice that has included porridge, salads, grilled chicken wraps, carrot sticks, fruit bags including apple and grape, pineapple sticks, and melon chunks, as well as orange juice, mineral water and organic semi-skimmed milk; • Customers can swap fries for fruit bags, carrot sticks or shake salad on the main menu, or the hashbrown for a fruit bag or carrot sticks on the breakfast menu, at no additional cost; • In 2014, McDonald's introduced "Free Fruit Fridays" resulting in 3.7 million portions of fruit being handed out. Since then, discounted fruit is now available with every Happy Meal. Fat</p> <p>2.23 A recent meta-analysis and systematic review of 72 studies (45 cohort studies and 27 controlled trials) demonstrated that with the exception of Trans Fatty Acids (TFA), which are associated with increased coronary disease risk, there was no evidence to suggest that saturated fat increases the risk of coronary disease, or that polyunsaturated fats have a cardio-protective effect, which is in contrast to current dietary recommendations (Chowdrey et al, 2014).</p> <p>2.24 However, UK guidelines currently remain unchanged; men should consume no more than 30g of saturated fat per day, and women no more than 20g per day (NHS Choices, 2013). It should be remembered that all fats are calorie dense (9kcal/g) and that eating too much of it will increase the likelihood of weight gain and therefore obesity, indirectly increasing the risk of coronary heart disease, among other co-morbidities.</p> <p>2.25 What have McDonald's done? • Reduced the saturated fat content of the cooking oil by 83%; • Signed up to the Trans Fats pledge as part of the Government's "Responsibility Deal"; • The cooking oil has been formulated to form a blend of rapeseed and sunflower oils to reduce levels of TFA to the lowest level possible; • They have completely removed hydrogenated fats from the vegetable oils; • Reduced the total fat in the milkshakes by 32% per serving since 2010; • Organic semi-skimmed milk is used in tea/coffee beverages and in Happy Meal milk bottles, with lower saturated fat levels compared with full fat variants.nu is under 500 calories.</p>		
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	982	General Providing for Wandsworth's People	<p><b>2 Contribution of McDonald's UK to the United Kingdom</b></p> <p>2.1 This section of the objection sets out some background context relating to McDonald's own business, its contribution to United Kingdom, and information on the nutritional value and healthy options of the food that it offers in its restaurants. This evidence is relevant to understanding the adverse and unjustified impacts of the blanket ban approach proposed under draft Policy LP15.</p> <p><b>Economic and Environmental Benefits</b></p>	Comment noted	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2.2 The first store in the United Kingdom was first opened in 1974 in Woolwich, London. The store is still opened and was interestingly the 3,000th store across the world.</p> <p>2.3 With over 36,000 McDonald's worldwide, it operates in over 100 countries and territories. Approximately 120,000 people are employed by McDonald's UK, compared to just over 1 million employees worldwide.</p> <p>2.4 McDonald's and its franchisees have become important members of communities in the United Kingdom: investing in skills and developing our people, supporting local causes and getting kids into football.</p> <p>2.5 Nationally, the company operates from over 1,300 restaurants in the UK. Over 80% of restaurants are operated as local businesses by franchisees, that's around 1,100 franchised restaurants.</p> <p>2.6 McDonald's is one of few global businesses that continues to anchor itself in high streets and town centres across the United Kingdom. Not just serving the general public but creating jobs and seeking to improve the communities around them.</p> <p>2.7 All McDonald's restaurants conduct litter picks covering an area of at least 100 metres around the site, at least three times a day, picking up all litter, not just McDonald's packaging.</p> <p>2.8 McDonald's is a founding member of the anti-littering campaign, Love Where You Live. As part of this, our restaurants regularly organise local community litter picks. The campaign has grown and in 2017, 430 events took place across the UK with around 10,000 volunteers involved. Since the campaign started, 2,600 events have taken place with around 80,000 volunteers involved.</p> <p>2.9 McDonald's restaurants are operated sustainably. For example, their non-franchised restaurants use 100% renewable energy, combining wind and solar and use 100% LED lighting which means we use 50% less energy than fluorescent lighting. All of their used cooking oil is converted into biodiesel for use by delivery lorries. Their entire fleet of lorries runs on biodiesel, 40% of which comes from McDonald's cooking oil. This creates over 7,500 tonnes fewer CO2 emissions than ultra-low sulphur diesel.</p> <p>2.10 All new McDonald's restaurants in the United Kingdom are fully accessible and we are working toward delivering this same standard for all existing restaurants.</p> <p>2.11 McDonald's restaurants provide a safe, warm and brightly lit space for people, especially those who may feel vulnerable or threatened waiting for a taxi or outside.</p> <p>2.12 Many of their toilets are open to all members of the public. They are one of few night time premises that offer this service and given the fact restaurants are located in some of the busiest parts of the country, McDonald's are helping to keep the United Kingdom cleaner.</p>		
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	983	General Providing for Wandsworth's People	<p>Please see attachment</p> <p><b>Nutritional Value of Food and Healthy Options</b></p> <p>2.13 McDonald's offers a wide range of different food at its restaurants.</p> <p>2.14 Nutritional information is easy to access and made available online, and at the point of sale on advertising boards, as well as in tray inserts. Information is given on calorie content and key nutritional aspects such as salt, fat and sugar content. This enables an individual is able to identify and purchase food items</p>	Comment noted	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>and combinations that fit in with their individualised calorie or nutritional requirements.</p> <p>2.15 The menu offer includes a range of lower calorie options, some of which are set out in the on the next page.</p> <p>2.16 The restaurants now suggest meal bundles to assist customers in making informed, healthier choices. McDonald's have suggested "favourites" meal bundles, across the breakfast and main menu that enable the choice of low-calorie options to be made even more easily. These 3-piece meal combinations will all be under 400kcal on the breakfast menu, and all under 600kcal on the main menu (with many options under 400kcal on the main menu also), and all individual items on these menu bundles will be either green (low) or amber (medium) on the Food Standards Agency traffic light system for food labelling.</p> <p>2.17 Examples of low calorie (less than 400kcal) breakfast options (where no single item is red for FSA) include any combination of the following:</p> <ul style="list-style-type: none"> <li>• Egg &amp; Cheese McMuffin / Egg &amp; cheese snack wrap / bagel with Philadelphia / porridge; with fruit bag; and a medium black coffee, or espresso or regular tea or water.</li> </ul> <p>2.18 Examples of low calorie (less than 600kcal) main menu options (where no single item is red for FSA) are included in the table below. Some 90% of our standard menu is under 500 calories.</p>		
	Labour Group			648	16.5	<p>And that the following paragraph be included in the supporting text:</p> <p>4   Page One of the main causes of poor health and wellbeing is the condition of housing. Residents who live in overcrowded and poor-quality housing lack amenities to relax or exercise and can suffer from health conditions that are exacerbated by the condition of their accommodation. Increased provision of affordable housing accessible to low-income individuals and families is essential if these inequalities are to be eradicated.</p>	Comment noted, wording has been added to LP15 to reflect the comment	Agreed, wording added to LP15 to refer to affordable housing and impact on health and well being
Mr Robert Arguile	Chair The Putney Society			323	16.9	<p>We agree that <i>'the creation, and maintenance, of resilient and connected communities . . . and which are people-centric – the council's People First ambition'</i> are laudable and desirable qualities for any community, and that <i>'enabling the borough's residents to achieve their potential'</i> should be at the heart of everything you do. However, on occasion, the People First ambition is not perceived by all residents to be working due to anti-social behaviour and street crime. For example the 'parklets' recently introduced in areas close to Putney High Street - an excellent idea in principle - are at times a meeting place for street drinkers which can discourage use by others.</p> <p>We would ask that the Council work more closely with police colleagues and other partners, in new and innovative ways, to tackle this antisocial and criminal behaviour. If residents feel scared walking home or back from a car parked far from their home; it can affect their mental health, lead to loss of confidence in the area/s affected, and ultimately discourage visitors and new residents. We should all be able to feel that our residential and shopping streets are safe. The current low police numbers and their lack of presence on the streets is keenly by some.</p> <p>Street drinkers often require support and help to tackle mental health issues, and it is disappointing</p> <p>to note that the drop-in facilities designed to address this issue in Roehampton have now closed.</p> <p>Continuing the theme of health and safety, could the council please confirm that in order to encourage older people to keep active outside the home, priority will be given to maintaining and improving pavements and eliminating trip hazards from uneven paving, one of the main causes of hip fractures?</p>	Comments noted. This response will be passed to the Putney BID and also the Council transport team.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1329	16.10	We would like to make the following suggestions: - More objective criteria for encouraging healthy lifestyles, e.g. "proposals for fast food takeaways would not result in an over-concentration of such uses located within 400 metres of the boundaries of a primary or secondary school" (16.10)	The wording has been altered to remove reference to over crowding and refer to the London Plan Policy E9 to provide more clarity.	Wording has been altered at LP15 to refer to London Plan E9
Dr Samuel Clifford				582	16.24	Community transport options (e.g. dial-a-ride) should be considered where the placement of social infrastructure would reduce the ability of particular groups to access it.	Comment noted. The Draft Local Plan policy LP17 Social and Community Infrastructure sets out that where services will not be provided close to the client base group then applications must demonstrate how this will not have a negative impact. This may include community transport options as an example.	No changes considered necessary for the Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1330	16.28	The impact of COVID-19 be taken into account in expectations for the growth of the visitor/tourism sector. (16.28)	Comment noted. The impact of Covid is unknown on the tourism sector in the longer term. The local plan will be for a 15 year period up to 2036 and it is envisaged that in that period the tourism sector will grow.	No changes considered necessary for the Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1332	16.40	We would like clarification on: - What plans do the council have to increase the play space and equipment in areas 'deprived of play space' (16.40)	The Open Space Study identifies open space provision for children and young people which includes Local Area of Play, a Local Equipped Area of Play, and a Neighbourhood Equipped Area of Play. It has identified areas of deficiency and proposes to enhance the sites which are low quality. Additionally, open space in the borough which have been found to be of low value and low quality will be considered for enhancement initially as the type of open space that it is currently classed as but failing that to be redesignated as an alternative form of open space i.e. play space. No change to the Local Plan are considered necessary.	No changes considered necessary for the Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1334	16.64	In December 2020 Brightside reported that the "Infrastructure provider G.Network has announced it will be investing more than £105m in upgrading Wandsworth's broadband connections"; but if this company somehow doesn't manage to cover all areas will the Council use its Community Infrastructure Levy to fund the provision of high speed broadband connectivity cabling to those areas which have been missed? (16.64)	Comment noted. As mentioned in the comment there has been a commitment made by the infrastructure provider to invest in upgrading the broadband connections. As set out in the Wandsworth regulation 123 list which states the types of infrastructure to be partly or wholly funded by CIL and this does not list network connections.	No changes considered necessary for the Local Plan
Alan Pates				30	Policy LP15	Sustainable transport measures need to be positive to work and not just aspirational. The Council sent a huge negative message when it removed all the active travel measures it introduced earlier in the year. The message it has sent is that it apparently has no actual commitment to addressing active travel.  We need proper safe cycling provision, action to improve air quality, destination spaces at district centres that are free from traffic etc.	Comment noted. The Council is committed to addressing climate change and to reach these ambitious targets. The Council has developed a detailed roadmap outlining actions that it will take to tackle climate change within the borough - the Wandsworth Environmental and Sustainability Strategy (WESS). The policies set out within the Local Plan will play a key role in delivering many of these actions.	No changes considered necessary for the Local Plan
Mrs Sue Rolfe	Werter Road Residents			96	Policy LP15	Relating to 7. Objectives (Social), 7.12 Vision, LP15 Health & Wellbeing, Healthy Streets 20.13/4/25  The current consultation draft uses many arguments supported by the document: Transport for London 10 Indicators of Healthy Streets 2017. However this was followed by a more substantial government document Healthy High Streets: Good Place-making in an urban setting 24 Jan 2018 by Public Health England and Institute of Health Equity. Although similar, the latter document appears to be the only one which contains references to crime and personal safety. The Wandsworth Local Plan based on the former document appears not to include these references. The government one is far more comprehensive and based on sound Public Health evidence.  The TFL document includes (Crime & Fear of Crime/Older People 1.3E) indicators such as that 'people feel safe' and 'people feel relaxed'. The government document refers to the detrimental effect on high streets of alcohol outlets and betting shops. It also alludes to 'crime and fear of crime' as being attributable to 'poorer areas'. This is clearly no longer the case in Putney where we have experienced an increasing level of crime and muggings in residential streets such as Norroy Rd.  The government document in reference to Older People states:	The Council has a legal duty to comply with the Mayor of London's Transport Strategy and the TFL Healthy Streets should be the document referred to. With regards crime and safety LP1A.10 requires developments to minimise opportunities for crime and antisocial behaviour including terrorist activities in a site-specific manner, based on an understanding of the locality and the potential for crime and public safety issues.  LP 53 Parking, servicing and Car free development sets out The allocation of car parking should consider the needs of disabled people, both in terms of quantity and location. In town centres and other locations with good public transport accessibility there is less need for off-street car parking.  Comments noted on parklets and condition of pavements.	No change considered necessary for Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>'Personal concern among older people can act as a deterrent to walking and using public transport in neighbourhoods particularly at night. Conditions of pavements can also act as a barrier to older people being socially connected, remaining physically active and accessing essential goods and services. This may exacerbate social isolation.'</p> <p>Relating to 'crime and safety' all residents need to feel that they can access their homes in safety and if they are car owners that they can park near their own homes. If they are pedestrians, that they can access their homes without fear of muggings.</p> <p>In these days of lockdown it would be invidious to judge conditions as the same as they might be out of lockdown. The homeless for instance are not as visible at present. Anti-social behaviour such as loitering, accosting passers- by or using local gardens and amenities as toilets is less rife. There has however not been a reduction of crime – whether scooter thieves or other muggings.</p> <p>Older people (not disabled) should reasonably be able to park near their homes – where they have paid for a parking permit. In the current pandemic many have not dared to travel by public transport. There is no evidence that pandemics will not happen in the future. Older people need their cars to feel safe.</p> <p>Civic spaces in the immediate vicinity of Putney High Street may have some appeal during daytime, albeit next to a busy route. They have, however, as local residents will confirm, proved to be the gathering points for less social elements, particularly during the evening, becoming threatening to passers- by, the older, infirm and women. The parklet in Montserrat Road became such an issue in terms of its lack of cleanliness and use by street drinkers that at the 11 November Safer Neighbourhood meeting it was agreed to remove it since it was wasting valuable police and ambulance time.</p> <p>We would like to see these evidence based sections included in the Local Plan, as well as a fairer strategy for all road users, so that action can be taken to actively redress issues of crime and personal safety. Widening pavements and making provision for the excellent delivery/shared space for Tesco is great, but before allocating monies on other 'improvements' could we not put 'improve condition of pavements' top of the list! Cf pavement design p.50 in PH document – tarmac safer surface.</p>		
Laura Hutson	Sport England			137	Policy LP15	<p>Health and wellbeing – Active Design</p> <p>I note within the document that there are references to ensuring the health and wellbeing of residents, including a strong commitment towards Active Travel.</p> <p>Sport England believes these references would be further strengthened by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles.</p> <p>Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:</p> <p>Active design</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.</p> <p>Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p> <p>That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity</p>	<p>Comment noted. The Council is committed to improving health and wellbeing in the borough. The recommended Active Design guidance is useful as it sets out innovative guidelines to encourage people to move more through sustainable design and layout. Therefore this will be included within the background text at LP15</p>	<p>Changes to background text at LP15 Health and wellbeing to reflect comments on using Sport England's Active Design Guidance.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>and increasing awareness, and sets out the Ten Principles of Active Design.</p> <p>Ten principles</p> <p>The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p> <p>The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.</p> <p>Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.</p> <p><a href="http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design">http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design</a></p>		
Mr Robert Arguile	Chair The Putney Society			322	Policy LP15	<p>LP15.A.2 &amp; 3 It is important that Youth Centres and other facilities for young people are preserved.</p> <p>We ask the council to ensure that any redevelopments of sites in the borough will not remove the current physical sites without a guarantee of replacement. In addition, the council is asked to ensure that new developments encourage the provision of dedicated facilities for young people, to enhance their health and wellbeing.</p> <p><u>Roehampton</u> It is well known, and acknowledged by the council, that Roehampton is poorly served by public transport. Lack of access to public transport can contribute to health inequality, already acknowledged as an issue in parts of Roehampton. It is therefore very disappointing to see, in the Area Strategy for Roehampton, that public transport is given very little prominence; indeed in Policy PM7 it is only noted in the last point of all. In our view it is not merely the relocation and/or creation of bus stops that will address this problem. Since Roehampton lacks the number and variety of shops available in other parts of the borough, many people need to travel to other shopping areas for essential items. It is vital that good public transport enables them to do this - provision requires vast improvement, with increased bus frequency and even new routes. A radical review of public transport in the area is needed to ensure that the people of Roehampton receive a greatly improved service, in accordance with the council's commitment to reduce health inequalities and to Start Well, Live Well, Age Well.</p>	Comment noted. The Draft Local Plan policy LP17 Social and Community Infrastructure sets out that where services will not be provided close to the client base group then applications must demonstrate how this will not have a negative impact. This may include community transport options as an example.	No changes considered necessary for the Local Plan
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	429	Policy LP15	<p>See attached</p> <p>The 400m Exclusion Zone is Inconsistent with National Policy</p> <p>Introduction</p> <p>3.1 This section of the objection considers the proposed policy against national policy. The lack of evidence to support the policy is also discussed in the next section.</p> <p>3.2 National policy contains no support for a restriction or exclusion zone for hot food takeaways (or indeed any other) uses. Such an approach conflicts sharply with central planks of Government policy such as the need to plan positively and support economic development, and the sequential approach that seeks to steer town centre uses –which include hot food takeaways- to town centres.</p> <p>3.3 Planware Ltd feel that restricting hot food takeaways within 400m of a school is in direct conflict with the framework as the approach is not positive, justified, effective or consistent. The policy, as currently worded, provides no</p>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>flexibility in accordance with town centre sites, thus conflicting with the sequential approach. These points are further explained in this objection. Practical Impacts</p> <p>3.4 The practical impacts on a 400m exclusion zone around schools would have unacceptable negative land use consequences.</p> <p>3.5 Consideration should be given to school rules in terms of allowing children outside of the school grounds at lunch times. This is overly restrictive on secondary schools and colleges, where a some of pupils will be legally classed as an adult. Additionally, some college and sixth form pupils will have access to a car, making such a restriction unsound. Consideration should also be given to primary school rules, where children are not allowed out of school at lunchtimes and are unlikely to arrive or leave school without a parent or guardian.</p> <p>3.6 No consideration is given to how the 400m is measured. Guidance should be provided as to whether this is a straight line or walking distance, as this can vary greatly. No definition is given to "over concentration". This needs to be clearly identified and a map provided of existing concentrations to ascertain the actual impact the policy would have site availability across the borough.</p> <p>3.7 The Framework does not support the use of planning as a tool to limit people's dietary choices. In addition to this, other A class uses can provide unhealthy products, therefore, there is limited justification for the proposed Policy LP15 to focus exclusively upon hot food takeaways. Conflict with National Policy</p> <p>3.8 The local policy team do not appear to have fully assessed the potential impact of the policy. It essentially creates a moratorium against hot food takeaways uses leaving limited reasonable space for them to locate.</p> <p>3.9 Restricting the location of new hot food takeaway proposals through a 400m exclusion zone around a school is not a positive approach to planning, thus failing to comply with the Framework.</p> <p>3.10 The suggested restriction within proposed Policy LP15,takes an ambiguous view of hot food takeaways in relation to the proximity to all schools. The policy would apply an over-generic approach to restrict hot food takeaway development with little sound planning reasoning or planning justification. This is contrary to paragraph 11 of the Framework that advises authorities to positively seek opportunities to meet development needs of their area.</p> <p>3.11 Thus, is consistent with paragraph 80-81 of the Framework.</p> <p>3.12 Para 80 states:"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."3.13Para 81 states: Planning policies should : "a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration ;b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."</p> <p>3.14 As explained in this objection, there is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. The need for evidence is emphasised in paragraph 31of the Framework that states that each local plan</p>		



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>should be based on adequate, up-to-date and relevant evidence. Neither the policy nor the supporting text address this point. Policy needs to be based on evidence and the lack of evidence should highlight areas of concern concerning the draft policy.</p> <p>3.15The policy is likely to be damaging to the district's economy due to the fact that it is restricting hot food takeaways to an unprecedented level without regard to the local area or the economy.</p> <p>3.16The Framework cannot be interpreted to provide generic restrictions on a particular use class. There is no basis for such a blanket ban approach in the Framework or Planning Practice Guidance. In fact, the Planning Practice Guidance emphasises that planning authorities should look at the specifics of a particular proposal and seek to promote opportunity rather than impose blanket restrictions on particular kinds of development. In the section on "Health and Wellbeing":3.17Paragraph: 002 (Reference ID: 53-002-20140306) states that in making plans local planning authorities should ensure that: "opportunities for healthy lifestyles have been considered (eg.planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation);"</p> <p>3.18Paragraph: 006 (Reference ID: 53-006-20170728) says that a range of criteria should be considered, including not just proximity to schools but also wider impacts. It does not support a blanket exclusion zone. Importantly, the criteria listed are introduced by the earlier text which states: "Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices."</p> <p>3.19The above guidance serves to emphasise why it is important to look at particular proposals as a whole, rather than adopting a blunt approach that treats all proposals that include a Sui Generis use as being identical.</p> <p>4The Policy is Inconsistent, Discriminatory and Disproportionate</p> <p>4.1 The policy aims to address obesity and unhealthy eating but instead simply restricts new development that comprises an element of Sui Generis use. Yet Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables, and hot food from a restaurant unit can be delivered to a wide range of locations, including schools. This means that the policy takes an inconsistent approach towards new development that sells food and discriminates against operations with an Sui Generis use. It also means that the policy has a disproportionate effect on operations with an Sui Generis use.</p> <p>4.2The test of soundness requires that the policy approach is "justified", which in turn means that it should be the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence (paragraph 35 of the Framework).</p> <p>4.3Given the objectives of the policy, it ought to apply equally to all relevant food retailers. It is unclear how the policy would be implemented and work in a real life scenario.4.4The table below shows the kind of high calorie, low nutritional value food that can be purchased from a typical A1 high street retailer at relatively low cost. It is contrasted with the kind of purchase that could be made at a McDonald's. The evidence provided at Appendix 1 confirms that 70% of purchases by students in the school fringe were not purchased in a hot food takeaway.14.5If the policy is to be based on Use Classes, then the proposed policy should place restrictions on other use classes in addition to hot food takeaways. In fact, by restricting hot food takeaway uses only, the policy would encourage food purchases at other locations and allows for the overarching objectives to be compromised.</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>4.6Finally, it is important that for the majority of days in the year (weekends and school holidays combined) schools are not open at all. Research by Professor Peter Dolton of Royal Holloway College states that "At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."21The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University.2Peter Dolton, Royal Holloway College, University of London &amp; Centre for Economic Performance, London School of Economics, Childhood Obesity in the UK: Is Fast Food a Factor? <a href="http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt">http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt</a></p> <p>or the minority of the year when schools are open, it is important to recognise that many schools have rules preventing children from leaving the school grounds during the school day, and in any event proximity to schools has no conceivable relevance outside of the particular times when children are travelling to or from school in circumstances where their route takes them past the development proposal. 4.8 The policy's approach fails to acknowledge that the opportunity for children to access hot food takeaways, as part of a school day, is extremely limited. The complete ban is wholly disproportionate to the circumstances when the concern underlying the policy might become a more prominent matter. Only limited purchases of food are made at hot food takeaways on journeys to and from school. Further details are set out in Appendix 2.</p>		
Monica Tross	Secretary to planning committee  Battersea Society			803	Policy LP15	<p>16 PROVIDING FOR WANDSWORTH'S PEOPLE</p> <p>LP15 Health and Wellbeing As with so much of this document, there are offers to 'promote and support development' but without any specific plans for steps to be taken by the Council itself.</p> <p>All the points mentioned are desirable but there is more the Council can do. For example, in making Council owned land available for allotment use either in the long or short-term and requiring there to be disabled parking within the boundaries of a development rather on the roadside. There should also be mention here of monitoring air quality, and promoting development which aims to reduce current levels, and which causes no additional pollution. For example new buildings should be built to achieve net zero as far as emissions are concerned and design policies should make this a fundamental concept. Materials must be produced using low energy methods, be sustainable and use timber rather than upvc. Material deliveries must be as local as possible and any planning permission must include conditions relating to these requirements. Energy sources must be included as part of the approval conditions.</p> <p>In terms of transport, the Council should endorse and promote the planned expansion of the Ultra-Low Emission Zone (ULEZ) and seek ways to do more to get the message across to schools and parents. Car use for school journeys must be discouraged and, if essential, car sharing made mandatory..</p> <p>We know that the Council does aim to tackle climate change in all its policies but there is more it can do to make this explicit.</p>	Comments noted. The draft local plan LP10 Tackling Climate Change and LP14 Air quality both seek to address climate change impacts within the policies.	No changes considered necessary for the Local Plan
Josephine Vos	Transport for London			736	Policy LP15	<p>TfL welcomes the emphasis on reducing car dependency, although specific measures to achieve this should be identified and set out.</p> <p>The policy and supporting text should reference the application of the Healthy Streets Approach as a practical measure to improve health and well being as well as quality of place.</p>	Comment noted. The Healthy Streets approach helps to use cars less and walk, cycle and use public transport more. Wording to be added to LP15 and reference to LP51 sustainable transport.	Wording has been added to LP 15 and the background text to refer to the Healthy Streets approach
	Labour Group			647	Policy LP15	<p>Whilst we welcome the recognition that "the built and natural environment ... plays a key role in the physical and mental wellbeing of the population" there is no specific recognition of the vital role that good quality housing plays in reducing health inequalities.We therefore ask that an additional clause be</p>	Comment noted. The importance of affordable housing does play a role in physical and mental wellbeing and wording will be added to LP15 Health and Wellbeing policy	Wording has been added to LP 15 to take account of the comment.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						included in policy LP15 Health and Wellbeing: A7. an increased supply of affordable housing, particularly social rent and London Affordable Rent tenures		
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	987	Policy LP15	<p>5 The Policy is not Justified because of a Lack of an Evidence Base</p> <p>5.1 The test of soundness requires policy to be evidence based. There is no evidence of any causal link between the presence of hot food takeaways within 400m of a school. Also, with no basis to indicate over-concentrated areas gives rise to obesity or poor health outcomes, justification is evidently incomplete. In fact, the studies that have considered whether such a causal connection exists [between proximity of a hot food takeaway and poor health outcomes], have found none.</p> <p>5.2 Public Health England (PHE), which is part of the Department of Health and Social Care, expressly accept that the argument for the value of restricting the growth in fast food outlets is only "theoretical" based on the "unavoidable lack of evidence that can demonstrate a causal link between actions and outcomes."<sup>3</sup></p> <p>5.3 A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation 'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.' It instead highlighted the need to 'develop a higher quality evidence base'.<sup>4</sup></p> <p>5.4 The range of US and UK studies used to support many beliefs about obesity, including the belief that the availability of fast food outlets increased obesity, was comprehensively reviewed in papers co-written by 19 leading scientists in the field of nutrition, public health, obesity and medicine. Their paper "Weighing the Evidence of Common Beliefs in Obesity Research" (published in the Critical Review of Food, Science and Nutrition (Crit Rev Food Sci Nutr. 2015 December 6; 55(14) 2014-2053) found that the current scientific evidence did not support the contention that the lack of fresh food outlets or the increased number of takeaway outlets caused increase obesity (see pp16-17 of the report).</p> <p>5.5 There appears to have been no critical assessment of whether the underlying evidence supports the proposed policy approach.</p> <p>5.6 In this context, it is important to consider the evidence from the Borough of Waltham Forest, which introduced a school proximity policy in 2008 – about a decade ago. Over that period, the Public Health England data for the borough shows that there has been no discernible impact on childhood obesity rates – with these worsening in recent years. The borough's Health Profile for 2017 records childhood obesity (year 6) at 26.1% up from 20.3% in 2012, the year London hosted the Olympic Games. 5.7 While it is accepted that the causes of obesity are complex, it is clear that the school exclusion zone policy had no discernible effect in Waltham Forest. More research and investigation is needed before such a policy approach can be justified by evidence.</p> <p>5.8 The policy clause about not permitting hot food takeaways in an area of 'over-concentration' must be supported statistically to determine such an area, as it will become a significant part of Policy LP15. Failure to adopt over-concentration parameters does not meet the four tests of the Framework. There is no justification and the draft policy is inconsistent and will likely cause 3 Public Health England &amp; LGA, Healthy people, healthy places briefing: Obesity and the environment: regulating the growth of fast food outlets, page 5, November 2013 4 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.</p> <p>negative land use implications. Without parameters decision making will be left to officer discretion.</p>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	988	Policy LP15	<p>6 Similar Policies Have Been Found Unsound When Promoted in Other Plans</p> <p>6.1 The lack of evidence between proximity of takeaways to local schools and its impact on obesity has been confirmed in a number of planning decisions.</p> <p>6.2 In South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating 'the evidence base does not adequately justify the need for such a policy', and due to the lack of information, it is impossible to 'assess their likely impact on the town, district or local centres'.<sup>5</sup></p> <p>6.3 Similarly, research by Brighton &amp; Hove concluded that 'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day'.<sup>6</sup></p> <p>6.4 The recent Inspectors response to the London Borough of Croydon (January 2018) regarding a similar prohibition on hot food takeaways, (where a similar campaign to persuade takeaway proprietors to adopt healthy food options existed) confirmed that the councils own 'healthy' plans would be stymied by the proposed policy, as would purveyors of less healthy food. The policy failed to distinguish between healthy and unhealthy takeaway food, and "confounds its own efforts to improve healthiness of the food provided by takeaway outlets" and failed to "address the demand for the provision of convenience food". The Inspector concluded that because the reasons for the policy do not withstand scrutiny, they must be regarded as unsound.</p> <p>6.5 The inspector at Nottingham City Council stated "There is insufficient evidence to support the link between childhood obesity and the concentration or siting of A3, A4 and A5 uses within 400m of a secondary school to justify the criterion of policy LS1 that proposals for A3, A4 and A5 uses will not be supported outside established centres if they are located within 400m of a secondary school unless it can be clearly demonstrated that the proposal will not have a negative impact on health and well-being the criterion and justification should therefore be deleted/amended".</p> <p>6.6 The inspector at Rotherham stated "Policy SP25 sets out various criteria against which proposals for hot food takeaways will be assessed. One of the criteria is designed to prevent hot food takeaways within 800 metres of a primary school, secondary school or college when the proposed site is outside a defined town, district or local centres. Having carefully considered the material before me and the discussion at the Hearing I do not consider there is sufficient local evidence to demonstrate a causal link between the proximity of hot food takeaways to schools and colleges and levels of childhood obesity. Although I accept that levels of childhood obesity need to be tackled by both local and national initiatives I do not consider there are sufficient grounds at the present time to include this particular aspect of land use policy in the RSPP".</p> <p>6.7 In Guildford, the inspector stated "Finally, the submitted Plan contains a requirement common to Policy E7 Guildford town centre, E8 District Centres and E9 Local Centres and isolated retail units that resists proposals for new hot food takeaways within 500 metres of schools. However, the evidence indicates that childhood obesity in Guildford is lower than the average for England. Childhood obesity may be a product of a number of factors, not necessarily attributable to 5 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing &amp; Planning Inspector, The Planning Inspectorate. 6 Brighton &amp; Hove City Council &amp; NHS Sussex, Hot-food takeaways near schools; An impact study on takeaways near secondary schools in Brighton and Hove, page 30, September 2011 Objection Response to Wandsworth Draft Local Plan Planware LTD on behalf of McDonald's Restaurants LTD 18 Friday, 26 February 2021 takeaway food; takeaways often sell salads as well as nutritious foods; not all kinds of takeaway food are bought by children; children have</p>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	989	Policy LP15	<p>7 Alternative Approaches</p> <p>7.1 Planware Ltd considers there is no sound justification for Part B Point 2 of the proposed Policy LP15. Point 2 should therefore be removed to provide consistency and to abide by the Framework. 7.2 Planware Ltd would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals, including examination of how new development can best support healthy lifestyles and the tackling of obesity. When a cogent evidence base has been assembled, this can then inform an appropriate policy response. That time has not yet been reached. 7.3 It is considered until such a time has been reached, point 2 should be removed. traditionally resorted to shops selling sweets and fizzy drinks, which would be untouched by the policy; and the policy would have no bearing on the many existing takeaways. In this context there is no evidence that the requirement would be effective in safeguarding or improving childhood health. It would be an inappropriate interference in the market without any supporting evidence and would therefore be unsound". 6.8The proposed 400m school exclusion zone in 'over concentrated' areas is a policy that we cannot agree to. The proposed approach is in direct conflict with the Framework. As mentioned in the above text, there is enough reputable information to demonstrate a current evidence base that fails to demonstrate the link between fast food and school proximity. There is also a clear absence of evidence to suggest restricting hot food takeaway use in 'over-concentrated' will lead to healthier lifestyles or influence an individual's dietary choice.</p>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Graduate Planner Planware	990	Policy LP15	<p>Conclusion</p> <p>8.1 McDonald's supports the policy objective of promoting healthier lifestyles and tackling obesity. It does not consider that the proposed Policy LP15 is a sound way of achieving those objectives. The underlying assumption in the policy is that all hot food takeaways (and any restaurants with an element of takeaway use) are inherently harmful to health. In fact, this is not supported by evidence. McDonald's own business is an example of a restaurant operation which includes takeaway but which offers healthy meal options, transparent nutritional information to allow healthy choices, and quality food and food preparation. The business itself supports healthy life styles through the support given to its staff and support given to football in the communities which the restaurants serve.</p> <p>8.2 In addition, the policy fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's own business is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. The economic benefits of its restaurants in supporting town centres and providing employment opportunities and training are substantial, and important given that improved economic circumstances can support improved health.</p> <p>8.3 The policy fails to acknowledge that food choices which are high in calories and low in nutritional value are made at premises trading with Class E consents and can be delivered from the latter. The policy makes no attempt to control these uses.</p> <p>8.4 For the reasons given in this objection the proposed policy is very clearly inconsistent with government policy on positive planning, on supporting economic development and the needs of businesses, on supporting town centres, and on the sequential approach. There is no justification in national policy for such restrictions to be applied to hot food takeaways. The effect of the policy had it existed in the past would have been to exclude restaurants such as McDonald's from major commercial and tourist areas.</p> <p>8.5 For the reasons given in this objection the proposed policy lacks a credible evidence base, and similar policies have been found to be unsound by inspectors who have examined other plans. In the one London Borough that has had a similar policy, concerning a school exclusion zone, for around a</p>	LP15 wording has been altered to align with London Plan policy E9. This policy has been through examination and this approach has been found sound.	Wording has been added to LP15B.2 to reflect the aspirations of London Plan policy E9

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						decade (LB Waltham Forest). It has had no discernible effect on obesity levels, which have in fact increased since its introduction.  8.6 Given the overall objective of improving lifestyles and lowering obesity levels, restrictive policy regarding hot food takeaway development is a narrow-sighted approach. There is no mention of other possible reasons behind the national high levels of obesity. To discriminate against hot food takeaways alone is worrying and using the planning system to influence people's daily lifestyle choices is not acceptable.		
Cllr Graeme Henderson and Cllr Rigby	Cllr Earlsfield Labour Party			922	Policy LP15	Health Inequalities  Planning has a major role to play in reducing the considerable health inequalities that exist across the borough and are set out in The Health Impact Assessment(HIA)section on 'Borough Profile'. The HIA should be actively applied to all planning developments to ensure that the 11 determinants of health and well-being as set out in Para 1.3 are fully achieved.	Comment noted. HIA's have appropriately been set at 50 units in line with larger scale developments. This also aligns with the London Plan approach.	No changes considered necessary for the Local Plan
H Monger	Director London Historic Parks and Gardens Trust			1242	Policy LP15	LP15 Health and wellbeing  In particular, we welcome clauses 2 (access to green infrastructure) & 4 (access to food growing). We suggest clause 2 is expanded to recognised benefits to mental health as well as to physical activity.	Comment noted. Agreed that green infrastructure also benefits mental health and should be encouraged.	Changes made to the local plan to address comment regarding mental health benefits and links to green infrastructure
Hassan Ahmed	GLA			1119	Policy LP15	<b>Health and wellbeing</b>  The Mayor welcomes Wandsworth's intention to promote health and wellbeing through the draft Local Plan. The requirement for Health Impact Assessments (HIAs) as part of development proposals for more than 50 dwellings aligns well with the Mayor's Good Growth objective GG3  Creating a healthy city. Wandsworth should note paragraph 6.9.5 of the PLP which suggests that Health Impact Assessments could also be a requirement for proposals for particular uses and the definition in the glossary of the PLP which sets out that HIAs should be undertaken as early as possible in the design process to identify opportunities for maximising potential health gains and addressing health inequalities.	Comment noted.	No changes considered necessary for the Local Plan
Mr Andrew Simpson	Planning Director South West London and St George's Mental Health NHS Trust	Anna Russell-Smith	Senior Planner Montagu Evans	1259	Policy LP15	<b>See attachment on comment 1256 for full representation</b>  <b>Health and Wellbeing</b>  The introduction of Policy LP15 (Health and Wellbeing) within the draft Local Plan, which identifies that the Council will promote and support developments that enable healthy and active lifestyles, is welcomed. SWLSTG supports the Council's policy position which seeks to ensure developments provide access to green infrastructure, sustainable modes of travel, local community facilities, healthy food opportunities and high quality inclusive design and public realm, which meet the needs of all populations in order to generate healthy communities. The Council's aspirations to ensure developments promote healthy and active lifestyles accords with both National and Regional planning policy, and is therefore welcomed. Paragraph 91 of the NPPF requires planning policies and decisions to aim to achieve healthy, inclusive and safe places and Local Plans should plan positively for the provision and use of shared space, community facilities and other services which enhance the sustainability of community and residential environments. Policy GG2 (Creating a Healthy City) of the London Plan seeks to improve Londoners' health and reduce health inequalities through the promotion of more active and healthy lifestyle and enable Londoners' to make healthy choices.  Part b of the draft Policy 15 requires planning applications to demonstrate that existing health facilities will be retained where these continue to meet, or can be adapted to meet resident's need. Whilst it is noted that the loss of healthcare facilities are dealt with under draft Policy LP17, the Trust's wider Estate Modernisation Programme (EMP) seeks to provide two new hospital	Comment noted. The intention of the policy is to reflect parts of London Plan Policy S2 regarding relocation and consolidation may be beyond the boundary. Wording will be added to the policy to reflect this.	Comment noted. Changes to the background text of the LP 17 Social and community infrastructure policy to potentially allow relocation and or consolidation to be beyond the borough boundary, in line with a relocation strategy of public provisions.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						facilities at Springfield Hospital, Tooting and Tolworth Hospital, Tolworth (RB Kingston upon Thames). As such we would encourage LBW to consider that 'need' may not only be on a borough basis but should also be considered on a wider strategic level and enable robust evidence that spans wider than the LB Wandsworth to be adopted when justifying need.		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1495	Policy LP15	At present, it is unclear how the references to health and wellbeing in the objectives and spatial and area strategies are carried forward into the policies and would be implemented. It would be helpful if an overarching framework for health and wellbeing under the 'People First' theme included a reference to the clauses in Policy LP15 Health and Wellbeing. Paragraph 2.64 also refers to the need to ensure that environmental impacts of development do not lead to detrimental effects on peoples' health. We would suggest that the paragraph refers to use of health impact assessments (as required under Policy LP15). The scope of health impact assessments extends beyond environmental risks and impacts.	Comment noted. The spatial strategy sets out the Local Plan's strategic vision and strategic objectives and by providing links to policies could mean that some policies were overlooked. LP15 sets out the requirements for health and wellbeing and the Local Plan should be read as a whole.	No changes considered necessary for the Local Plan
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1530	Policy LP15	<p>LP15 Health and Wellbeing</p> <p>We support Policy LP15 which will help achieve the vision and an objective of the draft Local Plan to improve the health and wellbeing of the local population and reduce inequalities.</p> <p>We have a few suggestions which are intended to strengthen the policy. Clause A refers to priority neighbourhoods in Tooting, Battersea, Queenstown and Roehampton. It is unclear how and why these neighbourhoods have been prioritised with no explanation in the supporting text. Whilst it is important that development in all areas promote healthy and active lifestyles, particular attention could be given to development in deprived areas.</p> <p>Paragraph 16.8 refers to the Joint Strategic Needs Assessment (JSNA) which recognises the link between unhealthy lifestyles and the environment that people live in. There is a strong relationship between deprivation and life expectancy.</p> <p>The Health Impact Assessment of the draft Local Plan (November 2020) notes that there is a life expectancy gap of approximately 9.3 years and 4.5 years for men and women respectively between the most and least deprived areas of the borough. According to English Indices of Deprivation (2019), Wandsworth had three Lower Super Output Areas (LSOA) that ranked amongst the 10% most deprived in London: one in Latchmere and two in Tooting.</p> <p>Wandsworth has a relatively young population with 9.4% of residents aged 65+, compared to 11.8% in London and 18.0% in England. However, the older population is projected to increase by 44% in the next 20 years and an ageing population will place pressure on existing services and facilities. Areas with higher concentrations of older people will require additional health and care services.</p> <p>We support Clause B (1) which requires the submission of a health impact assessment for all development proposals which include 50 or more residential units. We recognise that this already a local planning application requirement under Policy DMS1 of the Development Management Policies Document (March 2016).</p> <p>The purpose of an HIA is to address adverse health impacts and maximise health benefits. However, the policy only refers maximising health benefits. We suggest that the wording is amended to read:</p> <p>Planning Applications will be required to demonstrate that:</p> <p>1. <u>any potential negative health and wellbeing impacts have been addressed and health benefits have been maximised through the submission of a Health</u></p>	Agreed. Policy LP15 aims to promote health and wellbeing and this policy approach could be strengthened by the additional text suggested within the policy and also in the supporting text. LP17 has been updated accordingly to ensure that it does not contradict or duplicate the intention of the policy in relation to loss of NHS facilities.	Wording changes at LP15 and LP17 to reflect the comments made regarding strengthening the policy and ensuring consistency.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Impact Assessment for all development proposals which include 50 or more residential units.</p> <p>Whilst there is a definition of HIA in the Appendix 4 Glossary, we suggest that the supporting text to Policy LP15 should refer to HIA and provide some guidance. The planning application requirements document refers to the use of the NHS Healthy Urban Development Unit rapid HIA tool. It also states that the requirement for a HIA will be established at the pre-application stage as will the level of detail required depending on the type and scale of the development.</p> <p>The Health Impact Assessment of the draft Local Plan recommends that major developments in areas of deprivation should undertake detailed HIAs. This could be determined at the pre-application stage and could involve a greater level of analysis and community engagement.</p> <p>We support the other clauses in Policy LP15. However, we suggest that Clause A1. could refer to meeting the Healthy Streets objectives (see Policy LP51 Sustainable Transport). We consider that Clause B 3 referring to the retention of existing health facilities is insufficiently flexible and doesn't reflect Clause A 7 of Policy LP17 which would allow the loss of facilities, or part disposal of a site where declared surplus to requirements as part of an estate or service transformation strategy.</p> <p>We suggest that an additional clause is added to reflect the importance of well-designed homes for physical and mental health. The clause could be worded as follows:</p> <p>"ensuring that new homes are well-designed, have adequate internal space, provide sufficient daylight and sunlight, are well ventilated, avoid overheating and have access to outdoor amenity space."</p> <p>The draft plan could also consider the longer-term health and wellbeing implications of the Coronavirus pandemic in terms of travel, changing working patterns and demand for office space, the future of town centres and design of buildings and spaces. The pandemic has accelerated changes in the way healthcare services are provided and how facilities are used, with greater demand for digital services and flexible space. It is recognised that the NHS has a role in supporting the regeneration of high streets in the borough with an opportunity to locate health and wellbeing community hubs in town centres.</p> <p><u>LP17 Social and Community Infrastructure</u></p> <p>We support Policy LP17 which supports the provision of new social and community facilities, including health facilities as identified in strategies and investment plans using s106 planning obligations to mitigate the impact of development where insufficient capacity exists.</p> <p>However, when considering the loss of social or community infrastructure we consider that the policy is unclear and includes some repetition and possible contradiction. In the case of health facilities, the second sentence of Clause A 7 is sufficiently flexible to allow the loss of facilities, or part disposal of a site where declared surplus to requirements as part of an estate or service transformation strategy. The redevelopment of NHS sites and the introduction of housing and other uses provides vital investment to re-provide health facilities which are fit for purpose. However, the clauses under B 'Loss of Social or Community Infrastructure' if applied to health facilities would inhibit this. We therefore suggest that the policy is restructured, or the provision or loss of health facilities is treated solely under Policy LP15 Health and Wellbeing</p>		
Michael Atkins	Senior Planning Officer			1470	Policy LP15	<b>See the attachment on comment 1441 the representation for context</b>	Support noted.	No changes are necessary to the Local Plan.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Port of London Authority					11. Providing for Wandsworth's People  - Policy LP15: Health and Wellbeing. Support the inclusion in the policy that developments which enhance access to access to green infrastructure, including to river corridors is supported.		
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1404	Policy LP15	<b>LP15 - Health &amp; Well-being</b>  SGCARA strongly supports the proposals for health & well-being. This is another argument against infilling of small sites for residential development. By their nature, they will be constricted in size & lacking in both green & outdoor play-space.	Support noted.	No changes are necessary to the Local Plan.
Michael Leigh				47	Policy LP16	I welcome the commitments in LP 16 of the draft plan on public houses and bars.	Support noted.	No changes are necessary to the Local Plan.
Mr Robert Arguile	Chair The Putney Society			324	Policy LP16	Supported	Support noted.	No changes are necessary to the Local Plan.
Monica Tross	Secretary to planning committee  Battersea Society			804	Policy LP16	LP16 Public Houses and Bars  In practice the Council has not always been successful and has allowed proposals where historic and architectural interest has been lost, and where we doubt proper efforts have been made to maintain a public house or similar activity.	Comment noted. The Council has been at the forefront of pub protection policy and will continue its strong protectionist stance. It is considered that the proposed policy will strengthen the Council's position on the protection of Pubs.	No changes are necessary to the Local Plan.
Katie Parsons	Historic Environment Planning Adviser  Historic England			874	Policy LP16	<b>LP16: Public Houses and Bars</b>  We strongly support this policy and welcome the recognition of the heritage value of public houses.	Support noted.	No changes are necessary to the Local Plan.
Hassan Ahmed Hassan Ahmed	GLA			1115	Policy LP16	<b>Public houses</b>  The Mayor welcomes the borough's recognition of the important role and social function that public houses can play in the local and wider community. Draft Policy L16 is supported and the borough should consider referencing Policy HC7 of the PLP where appropriate.	Support noted.	No changes are necessary to the Local Plan.
Dr David Curran	Lavender Hill for Me			1168	Policy LP16	LP16 Public Houses and Bars (Local Plan page 262)  No comment other than to note our support for these proposals. The Article 4 direction was a landmark and very welcome policy and while we agree that the wider policy direction has maybe moved on in the right direction since, we nonetheless support its retention. In cases where public houses are lost, buildings should revert to other suitable town centre uses.	Support noted.	No changes are necessary to the Local Plan.
Michael Leigh				48	Policy LP17	I think the Council should make an explicit commitment to having a library in, at least, each of its brough centres	Local Plan Policy LP 17 Social and Community Infrastructure supports the provision of infrastructure. In areas of deficiency as identified in the Infrastructure Delivery Schedule the Council will require proposals to demonstrate how the effects of the development will be mitigated which may include the provision of a new facility.	No changes are necessary to the Local Plan
Mr Robert Arguile	Chair The Putney Society			325	Policy LP17	Supported  LP17.A.1 See the comment on LP15 above about the result of closures of facilities by the Council which are clearly needed.  LP17.A.5 This has not been demonstrated in the planning application for the	Comment noted.	No changes are necessary to the Local Plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Alton Estate 'regeneration' where it should have been, and must be in any revisions to this proposal.  LP17.B As above		
Monica Tross	Sectary to planning committee  Battersea Society			805	Policy LP17	LP17 Social and Community Infrastructure  There is more the Council can do. The proposed loss of a community space on the Surrey Lane Estate is an example of lack of practical support for this policy. While we understand the pressure for housing, the exclusion of other infrastructure in order to maximise units might not lead to the best outcome for the community. Encouragement should be given to ensure that best use is made of existing community facilities including activities outside their primary use (e.g. opening up school and religious buildings for community uses).	Comment noted. LP17 sets out in part C8, that use of any buildings are maximised in the evenings and at weekends to ensure that best use is made of the facility.	No changes are necessary to the Local Plan.
Mr Andrew Simpson	Planning Director  South West London and St George's Mental Health NHS Trust	Anna Russell-Smith	Senior Planner Montagu Evans	1260	Policy LP17	<b>See attachment on comment 1256 for full representation</b>  <b>Social and Community Infrastructure</b>  Draft Policy LP17 (Social and Community Infrastructure) outlines that The Council will work with its key partner organisations and developers to ensure that high quality social and community facilities and services are provided and/or modernised. As Springfield Hospital will provide a new state-of-the art mental health hospital and provides an option for a new School, SWLSTG welcomes the Council's commitment to supporting the delivery of both social and community facilities within the borough.  Part 3 of the draft policy identifies that the Council will achieve their overall aim, in relation to social and community infrastructure, through supporting investment plans and strategies for the provision of education facilities, health facilities, and services including for mental health care, GP and local hospital services. The acknowledgement of mental health facilities alongside other key health and community facilities is supported and SWLSTG welcomes the support from the Council in delivering investment plans and strategies for the strategic delivery of these services. The support for the provision of education facilities is further supported by our client and the promotion of dual use of social, education and community facilities to accommodate a mix of sporting, social, cultural and recreational uses is also welcomed.  Part B of draft Policy LP17 discusses the circumstances where the loss of social, community or cultural facilities will be resisted, unless it can be demonstrated clearly that there is no longer an identified need for the facility. The Policy further highlights that the loss will also be resisted unless it can be demonstrated that the existing facilities are being adequately re-provided in a different way or within a site in a convenient location, or the potential of re-using or redeveloping the existing site for an alternative social use where the needs of local and future residents have been fully assessed. The Trust welcomes part B however requests that acknowledgement within the accompanying policy text that the relocation and consolidation of services may be beyond the LBW boundary. This would further align with London Plan Policy S2 (Health and Social care facilities) which requires needs assessments to be produced that assess both locally and sub-regionally, to address borough and CCG cross-boundary issues.	Comment noted. The intention of the policy is to reflect parts of the London Plan Policy S2 regarding relocation and consolidation may be beyond the boundary. Wording will be added to the policy to reflect this.	Changes to the background text of the LP 17 Social and community infrastructure policy to allow potentially allow relocation and or consolidation to be beyond the borough boundary, in line with a relocation strategy of public provisions.
	NHS Property Services Ltd			1485	Policy LP17	See attached  Policy LP17 Social and Community Infrastructure NHSPS support the Council's intention to work with its key partner organisations and developers to ensure that high quality social and community facilities and services are provided and/or modernised in order to meet the changing needs.  It is welcomed that the Council recognise and support investment plans and strategies for the provision of health facilities and services including for mental health care, GP and local hospital services. NHSPS support part A7 of policy LP17 which sets out the council will support the provision of necessary health	Comment noted. The policy should allow loss of public services where it can be demonstrated there is no need and is part of a wider transformation plan. Wording will be added to the policy to reflect this.	Comment noted. Changes to the policy have been made to address concerns regarding loss of a public asset and requirements for the policy.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>and emergency services facilities in appropriate locations. The loss of existing health or emergency service facilities will only be permitted where facilities are declared surplus to need as part of any strategic restructuring of health or emergency services and after appropriate consultation. NHSPS would however seek further clarity that if part A7 is successfully applied to the disposal or redevelopment of an existing NHS asset, then Part B in its entirety would not apply. This clarification would ensure LP17 is consistent with London Plan Policy S1 which accepts the loss of health assets providing this is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services. NHSPS would also seek further clarification of what is meant by 'appropriate consultation' set out in LP17 part A7. NHS organisations are regulated outside of the planning regime and there is significant oversight by parties such as CCGs, NHS England and NHS Improvement who take a 'forward view' on healthcare planning needs. This involves significant amounts of consultation with stakeholders in relation to any service changes that they propose. Such oversight and consultation ensure that, in relation to healthcare premises, service reconfiguration is undertaken on a sound basis that does not prejudice service delivery for the foreseeable future. It should be accepted that this level of consultation meets the requirements of part A7.</p>		
University of Roehampton	University of Roehampton	Henry Brown	Turnberry Planning	1562	Policy LP17	<p><b>See attachment for representation with appendix and full context</b></p> <p>Loss of Social Infrastructure</p> <p>Policy LP17 Social and Community Infrastructure states that the loss of social, community or cultural infrastructure will be resisted unless the applicant can demonstrate that, among other requirements, the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local and future need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least 18 months.</p> <p>While the relocation of the University's facilities to its nearby Kingston Hill Campus could be interpreted as a loss of social infrastructure, the University wishes to confirm that it would not be required to undertake any marketing exercise to explore alternative social infrastructure uses for the site given the unique circumstances of the loss. This would be in accordance with Policy S3 Education and Childcare Facilities of the Publication London Plan (December 2020) which states that development proposals should ensure there is no net loss of social infrastructure unless it can be demonstrated that there is no ongoing or future need. In this instance there would be no net loss, with equivalent facilities developed at the University's nearby Kingston Hill Campus.</p> <p>The University seeks assurance that this cross-borough re-provision will be counted under the policy as required for the Plan to be 'Effectively Prepared' in line with paragraph 35 of the NPPF which requires "effective joint working on cross-boundary strategic matters". Further to this the University objects to part B5 of Policy LP17, which stipulates that "adequate replacement floorspace must be of equal or improved capacity, design and layout as that being lost through development". In this instance it is likely that there would be a reduction in overall floorspace as the new building will not need to fully duplicate services and support functions already present at the Kingston Hill Campus.</p> <p>Moreover, it would be far more Effective and Justified if the Policy did not apply to those social and community sites which were allocated in the Local Plan for other uses and instead, is directed at 'windfall' sites for which no strategic case has been advanced. We also consider that Clause B2 should be split so that the relocation and consolidation of social and community infrastructure (as would happen in respect of Roehampton Vale site), are not needlessly tested against marketing exercises (B3) and other tests set out in criteria B4 and B5. Only needs based cases i.e. those instances where no requirement for the</p>	<p>Comment noted. The intention of the policy is to reflect parts of the London Plan Policy S2 regarding relocation and consolidation may be beyond the boundary. Wording will be added to the policy to reflect this.</p>	<p>Changes to the background text of the LP 17 Social and community infrastructure policy to allow potentially allow relocation and or consolidation to be beyond the borough boundary, in line with a relocation strategy of public provisions.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>consolidation or relocation is deemed to be needed, would we expect clauses B3-5 to apply.</p> <p>The Policy should therefore be amended to allow these changes so it is Effective in line with the tests of Soundness, as track-changed below:</p> <p>POLICY LP17 SOCIAL AND COMMUNITY INFRASTRUCTURE</p> <p>Loss of Social or Community Infrastructure</p> <ol style="list-style-type: none"> <li>1. The loss of social, community or cultural infrastructure <u>which has not been allocated for other uses within the Local Plan</u> will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly: <ol style="list-style-type: none"> <li>1. that there is no longer an identified need for the facilities or future demand for the space or that they no longer meet the needs of users and cannot be readily adapted to meet that need; or</li> <li>2. that the existing facilities are being adequately re-provided in a different way or on another site in a convenient alternative location accessible to the community it currently supports; or</li> <li>3. that there are sufficient suitable alternative facilities in the locality; and</li> <li>4. 4. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local and future need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least 18 months in line with the requirements set out in Appendix 1;</li> <li>5. 5. that it can be shown that the proposal does not constitute the loss of a service of particular value to the local community which may impact the vitality of the area; and</li> </ol> </li> <li>6. if B (2) applies, adequate replacement floorspace must be of equal or improved capacity, design and layout as that being lost through development <u>unless the loss forms part of an agreed</u> strategic programme of re-provision which better meets the needs of existing users, and must be in accordance with C below.</li> </ol>		
Mr Tom MRTPI	National Planning Adviser Theatres Trust			240	Policy LP18	The Trust is supportive of this policy approach and the strong support and protection afforded to Wandsworth's valued facilities including its theatres, consistent with NPPF and London Plan policy.	Support noted.	No changes are necessary to the Local Plan.
Mr Robert Arguile	Chair The Putney Society			326	Policy LP18	We support the provision of new and retention of Arts & Culture within the town centre.  LP18.D & E Funding everything through Planning Obligations makes new housing even more expensive.	Support noted. As set out in the background text it is only where appropriate a planning obligation will be secured and must comply with the planning obligation tests.	No changes are necessary to the Local Plan.
Monica Tross	Sectary to planning committee Battersea Society			806	Policy LP18	LP18 Arts, Culture and Entertainment  As we have mentioned elsewhere, much more could be done in relation to Clapham Junction town centre. In time there could, and should, be a cinema in the area, perhaps related to the conversion of the Arding and Hobbs building or within part of the Grand.  We are surprised that little reference is made to the Royal College of Art and its role as a world leader in industrial design and applied art. As highlighted in	Agreed, Royal College of Art should be referenced. The Council is already making the linkages with BDTQ and council is taking forward with arts and culture strategy.	Wording added to Riverside Area strategy referencing Royal College of Art as a world leader.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						relation to the BDTQ there need to be stronger links developed across these sectors within Battersea.		
Dr David Curran	Lavender Hill for Me			1169	Policy LP18	<p>LP18 Arts, Culture and Entertainment (Local Plan page 266)</p> <ul style="list-style-type: none"> <li>support the recognition that vacant retail units can have beneficial use as 'Meanwhile' cultural premises at the eastern end of Lavender Hill has repeated use as gallery space, before eventually being reconfigured and returning to retail use.</li> </ul> <p>We propose that the Battersea Business Centre, and adjacent retail frontage should also be included in paragraph 16.33 as falling within scope of potential sites that could accommodate new cultural space uses, given the significant role it already has in terms of physical arts and design(which is acknowledged elsewhere in the Clapham Junction Area Strategy).It is not a destination venue but is clearly within the scope of "smaller facilities or large facilities that do not attract significant numbers of visitors", not least because it already includes a significant number of such premises. The nearby retail premises (several of which are in common ownership with the Business Centre itself) tend to switch between retail use and business-centre related uses subject to demand and availability, and we see no harm in this. There are also many example of businesses having started in the Business Centre and 'graduated' to larger freestanding premises, often retail units on Lavender Hill.</p>	Agreed	Wording changes in background text to LP18.
Mr Robert Arguile	Chair The Putney Society			327	Policy LP19	<p>Supported overall</p> <p>Existing play &amp; recreation areas must be preserved. For example in Putney the pocket park on the corner of Charlwood Road and Upper Richmond Road now has a planning application for flats and retail space on the ground floor. This is very disappointing. It is one of the only small open spaces in the area, and was only landscaped and planted in 2019. Local residents were involved in planting and ensuring there was seating available. This is a well-used open space in an otherwise built up area, with no other open spaces nearby. Although small, it is much utilised by parents and their children, who can be supervised while playing there safely.</p> <p>Putney is becoming more congested with the proposed build of more flats and retail space, when there are empty shops available, and more will likely become empty due to the impact of Covid19.</p> <p>LP19.B How to calculate 'per child' should be stated for clarity.</p> <p>LP19.D New spaces should where possible be in sight of the dwellings they relate to.</p>	Comment noted. Policy LP55 Protection and Enhancement of Open Spaces protects pocket parts such as the one mentioned from development, this policy relates specifically to play space. Paragraph 16.42 provides more detail as to how to calculation for play space. Detailed design guidance for play spaces can be found in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG.	No changes considered necessary for the Local Plan
Stephen Knowles				1413	Policy LP19	<p>To Whom it May Concern First of all I would like to commend the council and planning team on a very comprehensive and well considered document. I would like to comment on the following areas and policies</p> <p>LP19 D - Include Natural plants, trees and features covering at least 15% of the play area. - It is important that children have the chance to connect with nature rather than just rubber mats</p>	Comments noted. Policy LP58 Tree Management and Landscaping sets out tree requirements for new developments. No changes to the Local Plan are considered necessary.	No changes considered necessary for the Local Plan
Michael Leigh				46	Policy LP20	I would seek a commitment that the terms of any new privately owned public space negotiated by the Council would not permit the private owner to close it (LP 20/A/8) on a temporary basis for arbitrary reasons as I understand has happened elsewhere.	Comment noted. Terms such as this would be negotiated as party of the planning conditions for an application.	No changes considered necessary for the Local Plan
Mr Robert Arguile	Chair The Putney Society			328	Policy LP20	Supported, but there also needs to be a policy to protect the spaces that exist.	Paragraph 16.42 provides more detail as to how to calculate for play space.	No changes considered necessary for the Local Plan
Monica Tross	Sectary to planning committee			807	Policy LP20	LP19 Play Space and LP20 New Open Spaces	Comments noted.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society					We welcome these policies which should form part of the masterplan for any new development from its outset. The principles of LP20 could prove useful in considering existing open spaces and their wider context.		
H Monger	Director London Historic Parks and Gardens Trust			1241	Policy LP20	We support Policies: LP20 New Open Space  This policy sets out a clear expectation of new development to ensure the underlying principles of the local plan are achieved. We are pleased to see the issue of funding impacts from incremental growth.	Comments noted.	No changes considered necessary for the Local Plan
Kin Development		Ben Ford	Director Quod	1042	Policy LP20	Background and Wandle Delta SPD comments are included in the attachment in comment 1025  <u>Underlined is text which should be removed. In bold is new suggested text</u>  <b>Chapter 16 Providing for Wandsworth's People</b>  <b>Policy LP20 (New Open Space) – SUPPORT</b>  Kin support the approach within Policy LP20 (New Open Space) for all major developments to provide new public open space on site, and to make improvements to the public realm and/or provide a financial contribution toward the enhancement of existing public open space and the public realm in the locality if it can be clearly demonstrated that on-site provision is not feasible or appropriate. Kin recognise and support the requirement of LP20 is in conformity with the Council's adopted Planning Obligations SPD, which sets out the requirement for the provision of open space.	Comments noted.	No changes considered necessary for the Local Plan
VSM Estates	VSM Estates	Freya Turtle	Associate Director Turley Associates	1064	Policy LP20	<b>For full context, see the attachment with comment 1058</b>  Policy - Policy LP20 New Open Space  London Plan conformity - No comment.  NPPF: positively prepared - No comment.  NPPF: justified No comment.  NPPF: effective - No comment.  NPPF: consistent with national policy - Policy LP20 states that all major developments are required to provide a financial contribution to open space, if on-site open space cannot be provided. VSM does not consider this to be consistent with the NPPF paragraph 56, which states that planning obligations must only be sought where they meet the tests from Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.  It might be the case that the open space requirements of new development can be accommodated by existing open space, such that the payment of a financial contribution would not meet the policy/legal tests. Policy LP20 should be amended to remove the blanket requirement for all major development needing to pay a financial contribution and instead regard should be had to the tests and the need for open space.  Suggested amendments to policy - Policy LP20 should be amended to remove the blanket requirement for all major development needing to pay a financial contribution and instead regard should be had to the tests and the need for open space.	Comment noted. LP22 Planning Obligations sets out that all planning obligations must meet the three tests reference in CIL Regulations.	No changes considered necessary for the Local Plan
Stephen Knowles				1414	Policy LP20	LP20  <ul style="list-style-type: none"> <li>There should be a provision for major developments to have a green/natural open space of a minimum size and accessible to all. Recent</li> </ul>	Comment noted. The Planning Obligations SPD sets out how the quantum of new open space is calculated. Chapter 2 of the draft Local Plan establishes the placemaking principles which are referred to in part A(5) of LP20 which address the concerns raised about design quality. No changes to the Local Plan are considered necessary.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>developments such as the Osiers way fall way short on this measure. Each courtyard is small, paved and designed / planted to prevent people walking/ sitting on it. Numerous small areas shaded on all sides by tall building means they are also less appealing to visitors.</p> <p>Such open spaces should have access to direct sunlight where possible.</p>		
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1544	Policy LP20	<p><b>See attachment in representation 1534 for context</b></p> <p>Chapter 16 Providing for Wandsworth's People</p> <p>Policy LP20 (New Open Space) – SUPPORT</p> <p>L&amp;G support the approach within Policy LP20 (New Open Space) for all major developments to provide new public open space on site, and to make improvements to the public realm and/or provide a financial contribution toward the enhancement of existing public open space and the public realm in the locality if it can be clearly demonstrated that on-site provision is not feasible or appropriate. L&amp;G recognise and support the requirement of LP20 is in conformity with the Council's adopted Planning Obligations SPD, which sets out the requirement for the provision of open space.</p>	Comment Noted.	No changes considered necessary for the Local Plan
DTZ Investors		Neil Wells	Quod	1506	Policy LP20	<p>Chapter 16 Providing for Wandsworth's People</p> <p>Policy LP20 (New Open Space) – SUPPORT</p> <p>DTZi support the approach within Policy LP20 (New Open Space) for all major developments to provide new public open space on site, and to make improvements to the public realm and/or provide a financial contribution toward the enhancement of existing public open space and the public realm in the locality if it can be clearly demonstrated that on-site provision is not feasible or appropriate. DTZi recognise and support the requirement of LP20 is in conformity with the Council's adopted Planning Obligations SPD, which sets out the requirement for the provision of open space.</p>	Comment Noted.	No changes considered necessary for the Local Plan
Mr Robert Arguile	Chair The Putney Society			329	Policy LP21	LP21.A Needs to be divided into two clauses after the first full stop. Protect + New	Detailed design guidance for play spaces can be found in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG.	No changes considered necessary for the Local Plan
Monica Tross	Secretary to planning committee Battersea Society			808	Policy LP21	<p>LP21 Allotments and Food Growing Spaces</p> <p>This is welcome but why are allotments included at LP15 and then with more detail here?</p>	LP15 Health and Wellbeing identifies that the Council will promote and support development which enables healthy and active lifestyles and includes measures to reduce health inequalities through the provision allotments among other land uses. LP21 provides protection for existing allotments and provides greater detail as to how and when the creation of allotments or food growing spaces will be supported.	No changes considered necessary for the Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1331	Policy LP21	New allotment space is not the best use of public space as this competes with the play areas committed to earlier (LP21).	Comment noted. Both land uses will be required of new major developments.	No changes considered necessary for the Local Plan
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1333	Policy LP21	Do historical developments have space set aside for allotments? (LP21)	The draft Local Plan policies will only affect future planning applications and can not be applied retrospectively.	No changes considered necessary for the Local Plan
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1405	Policy LP21	<p><b><u>LP21 - Allotments &amp; food-growing spaces</u></b></p> <p>1. <i>'The Council will protect existing allotments and support the creation of community spaces for growing food. Food growing spaces will be required in major new developments'</i></p>	Comment noted.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						SGCARA strongly supports the uncompromising protection of all existing allotments, & the creation of more where at all possible, alongside community food-growing spaces. This must not be diluted or compromised by pressures of land-value or other potential use. )This is very pertinent to us at present, as there rumours of proposals by the owner of the RifleClub/Allotments behind the Granville Rd railway bridge that would involve the loss of the Allotment land. We would strongly resist this & expect WBC not to allow it.		
Stephen Knowles				1415	Policy LP21	LP21 A - There should be no get out. The roof of every new building on a major development could have an allotment or green roof on it so it can always be feasible and appropriate	Comment noted. See policy LP59 Urban Greening Factor for more information on urban greening requirements and green roofs.	No changes considered necessary for the Local Plan
Mr Robert Arguile	Chair The Putney Society			330	Policy LP22	Lots of policies above expect to fund extensive public provision through planning obligations. This needs to be balanced with the simple fact that Planning Obligations makes new housing even more expensive. A proper balance must be struck against other forms of council funding.	Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), are a mechanism which make a development proposal acceptable in planning terms, which would otherwise be unacceptable.	No changes considered necessary for the Local Plan
Monica Tross	Sectary to planning committee Battersea Society			809	Policy LP22	LP22 Planning Obligations  We cover specific concerns about these in relation to transport within our comments on Chapter 20.	Comment Noted.	No changes considered necessary for the Local Plan
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1531	Policy LP22	LP22 Planning Obligations  We support the policy. The Council's Planning Obligations SPD (October 2020) supports the use of s106 planning obligations to secure on-site facilities or financial contributions to increase capacity subject to the CIL Regulation 123 tests. It advocates the use of the HUDU Planning Obligations Model to size and cost a new on-site facility or calculate a financial contribution. The CCG has secured Community Infrastructure Levy funds to help deliver the Sleaford Street health facility in Nine Elms and s106 contributions for healthcare in other parts of the borough. Paragraph 16.59 refers to the Council's Infrastructure Delivery Plan (IDP)and Infrastructure Funding Statement to set out infrastructure requirements and specific projects to which CIL and/or s106 receipts could be allocated. The CCG and NHS partners would welcome the opportunity to continue to work with the Council to update the IDP focusing on the impact of development in different areas and aligning requirements with the Wandsworth Health and Care	Comment Noted.	No changes considered necessary for the Local Plan
	NHS Property Services Ltd			1486	Policy LP22	See attached  LP22 Planning Obligations  As set out in our Issues and Options consultation, it is important Wandsworth maximises opportunities to use planning obligations to secure healthcare infrastructure. Large residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that planning obligations for new healthcare facilities are necessary. The requirement that boroughs recognise the role large sites can play in delivering necessary health facilities is critical. Similarly, cumulative development can place incremental pressure on health services and the Council should actively engage with the NHS to ensure an equitable share of Community Infrastructure Levy funding is secured for healthcare.	Comment Noted.	No changes considered necessary for the Local Plan
Mr Robert Arguile	Chair The Putney Society			331	Policy LP23	The Putney Society supports and applauds the council's aims and intentions regarding digital connectivity infrastructure, and digital inclusion.  However, that within this aim and policy, the council's own communications teams must remember the needs of those who are digitally excluded, for whatever reason. It is vital that the council continues to ensure that information is widely available in a range of formats and materials, for the duration of the Local Plan, and beyond, including:  · information in printed paper form,  · the option to contact the council by phone and/or letter,	Comment Noted.	No changes considered necessary for the Local Plan



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>· car parking permits and visitor permits continue to be available in paper form</li> <li>· all other forms, for whatever purpose, continue to be available in paper form</li> <li>· there should be no financial penalty when residents want/need to pay by cash or cheque and are unable to pay online, or have to visit the Council premises in person to conduct their business</li> </ul>		
Monica Tross	Sectary to planning committee Battersea Society			810	Policy LP23	<p>LP23 Utilities and Digital Connectivity Infrastructure</p> <p>We support these policies and can only emphasise the need to reduce street clutter and minimise intrusive structures including In Link and other advertising structures on pavements and within railway stations</p>	Comment Noted.	No changes considered necessary for the Local Plan
Michael Atkins	Senior Planning Officer Port of London Authority			1471	Policy LP23	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP23: Utilities and Digital Connectivity Infrastructure.</p> <p>Support the reference to part D of the policy with regard to the Thames Tideway Tunnel project, that the borough will continue to work with Thames Water and Bazalgette Tunnel Limited to support the timely implementation of the project.</p>	Comment Noted.	No changes considered necessary for the Local Plan
Mr David Wilson	Senior Town Planner Thames Water			742	Policy LP23	<p>Dear Sir/Madam,</p> <p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.</p> <p>As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a "specific consultation body" in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document in relation to water and sewerage infrastructure (we will respond separately in relation to our land holdings):</p> <p><b><u>LP23 Utilities and Digital Connectivity Infrastructure</u></b></p> <p>We support Policy LP23 in principle in relation to water and sewerage infrastructure capacity. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is</p>	Comment noted.	The suggested inclusion has been added to the supporting text.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...."</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs.</p> <p>The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001- 20140306).</p> <p>Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</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.</p> <p>The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</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.</p> <p>As 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.</p> <p>Information on how off site network reinforcement is funded can be found here <a href="https://developers.thameswater.co.uk/New-connection-charging">https://developers.thameswater.co.uk/New-connection-charging</a></p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply and network infrastructure both on and off site;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met</li> </ul> <p>Thames Water offer a free 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 free pre planning service are available at: <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>In light of the above comments and Government guidance we consider that the New Local Plan should include the following additional text to support Policy LP23:</p> <p>PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE TEXT:</p> <p>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water 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. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p>		

## Chapter 17 - Providing Housing

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Lois Davis	Co-ordinator Wandsworth Green Party			477	General Providing Housing Comments	We welcome the acknowledgment in chapter 2 that there are some 8,800 households on Wandsworth's Housing Register and that this increases a need for low-cost rented accommodation. However we regret that overall the strategy for providing housing outlined in chapter 17 appears to prioritise planning for home buyers rather than home renters and believe that such an approach will make it difficult to deliver sufficient genuinely affordable housing during the lifetime of this Local Plan.	The affordable housing tenure split has been informed by the Local Housing Needs Assessment (2020), which recommended an equal split of 50% low-cost rented housing and 50% intermediate housing. This was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The Local Housing Needs Assessment (2020) includes a justification behind the recommended policy approach.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee  Battersea Society			811	General Providing Housing Comments	<p>17 PROVIDING HOUSING</p> <p>Population and Migration.</p> <p>Both the Housing Needs Assessment (HNA) and the Plan seem to regard the current high levels of inward and outward migration by young adults as a given, about which nothing can be done.</p> <p>We disagree, profoundly. Current levels of migration are unsustainable and incompatible with the Council's aim to establish stable local neighbourhoods and balanced, cohesive communities. This has implications for all aspects of housing provision, particularly relating to affordable housing and housing mix.</p> <p>Wandsworth's population, like London's, is increasing significantly, though there is some evidence of a fall in London's population during 2020. A significant part of the increase is the result of major new housing developments at Nine Elms and along the River Thames. The population is also highly-skewed towards the young. Data from the Office of National Statistics (ONS) shows that Battersea has the highest proportion of 25-34 year-olds of any Parliamentary constituency in the UK; and Putney and Tooting are not far behind. ONS and NHS data also show very high levels of both inward and outward migration from Wandsworth. Young people in particular are attracted to move in by Wandsworth's convenient location, with easy access to the West End and the City. Most of them live in shared rented flats, and then move out because they are unable to find the kind of housing they want, at an affordable level, as they progress to the next stage in their lives. To what extent this pattern will change as a result of the pandemic is not clear.</p>	Comment noted. The Local Housing Needs Assessment recognises that Wandsworth has one of the most mobile populations in England. Policy LP31 aims to address this issue to some extent by proposing a restrictive approach to co-living schemes. Large scale shared living accommodation consists solely of bedrooms, and therefore does not cater for the needs of residents who wish to continue to live within the borough, but rather for a more transient occupier. Policy LP25 Affordable Housing seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. These approaches will ensure that new homes contribute to supporting the creation of stable local neighbourhoods and cohesive communities.	No change to the Local Plan required as a result of this representation.
Katie Parsons	Historic Environment Planning Adviser  Historic England			869	General Providing Housing Comments	<p><b>HELAA:</b></p> <p>We question some of the assumptions made to determine site capacity. The HELAA uses the previous version of the London Plan to determine capacity i.e. the density matrix. The emerging London Plan (due to be adopted imminently 2<sup>nd</sup> March 2021) does not contain such a matrix, instead it promotes a design-led approach to site capacity. An element of design-led work must be carried out at plan-making stage, numbers will necessarily be indicative but a more realistic, London Plan compliant indication of capacity should be provided in the plan.</p>	Comment noted. The Housing and Economic Land Availability Assessment has been revised. It no longer relies on the density matrix to determine site capacity. The revised approach to determining capacity relies on development scenario modelling for some sites and the application of an algorithm for the remaining sites. The algorithm is based on a number of Wandsworth-specific assumptions about the potential capacity of sites in view of the regional and local policy and evidence context. This has taken into account a wide number of important factors, including, but not limited to building height limits, sensitivity to change, capacity for growth, heritage assets. The detailed methodology is set out in the Urban Design Study.	Housing and Economic Land Availability Assessment to account for the design-led approach.
Brendan Conway				917	General Providing Housing Comments	Representation regarding Community Led Housing. Consultee seeking further discussion on the matter in reference to the Local Plan. See attachment.	Comment noted. Policy LP24 (now SDS1) seeks to promote self/custom-build and community led development. This is considered sufficient to enable community led housing to emerge within the borough.	No change to the Local Plan required as a result of this representation.
Hassan Ahmed Hassan Ahmed	GLA			1096	General Providing Housing Comments	<p><b>Housing</b></p> <p>The PLP sets out how London's housing need can be met within its boundaries and sets Wandsworth a 10-year net housing delivery target of 19,500 units (1,950 per annum) up to</p> <p>2029 as set out in Table 4.1. Of this target, 4,140 new homes should be identified from small sites (set out in Table 4.2 of the PLP). The emerging Local Plan acknowledges the London Plan targets and commits to meeting them by</p>	Please note that revisions have been made to policy LP24 (now contained within SDS1). As the Plan period extends beyond that for which housing targets are set through the London Plan a housing requirement has been set for the whole of the Plan period having had regard to paragraph 4.1.11 of the London Plan. To this end the housing requirement set out in Policy SDS1 has taken account of the housing capacity figures for large sites as set out in the Greater London Council's Strategic Housing Land Availability Assessment 2017, together with the continuation of providing 414 new homes a year on smaller sites across the borough. In determining the housing requirement for the period 2023-2038 the Council has also taken account of the local capacity evidence set out in the	<p>Policy LP24 (now SDS1) amended to clarify that the housing target set out in the London Plan will not be rolled forward beyond 2028/2029. A housing requirement has been set for the whole of the Plan period.</p> <p>Policy LP24 (now SDS1) amended to include a reference to the small sites sub-target.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						2028/29. If Wandsworth requires a target beyond 2029 then paragraph 4.1.11 of the PLP should be considered in collaboration with the GLA and should include rolling forward the borough's small sites target. The Mayor welcomes the borough's acknowledgment of and supportive approach to the PLP housing target for small sites in paragraph 14.60 of the draft Plan and encourages the movement of this reference from the supporting text into the main body of Policy LP7. The borough's commitment to the preparation of an SPD which will identify sites and set out design codes for those sites/areas is also welcomed as it accords with the requirements of London Plan Policy H2 and notes that the GLA is developing London Plan Guidance which includes guidance on assessing the quality of small site development and preparing design codes to increase housing supply from them. This may be of use when developing the SPD.	Housing and Economic Land Availability Assessment.  To ensure that the Local Plan is in conformity with the London Plan, policy SDS1 makes it clear that the requirement for the whole of the Plan period includes the provision of a minimum of 1,950 new homes per year by 2028/2029, of which 414 will be provided on small sites. The policies and proposals set out in the Local Plan will be subject to review, in whole or in part, at least once every five years after its adoption, and thus the housing requirement for years beyond 2028/2029 will be reviewed in due course.	
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1545	General Providing Housing Comments	<b>See attachment in representation 1534 for context</b>  Chapter 17 Providing Housing  L&G support the overarching growth strategy objective of ensuring a significant increase in the supply, choice and mix of high-quality new homes, delivering genuinely affordable homes to enable and encourage residents to stay in the Borough and strengthen communities. The proposal to create opportunities to deliver 13,817 homes by 2028, and 20,702 homes by 2033 is supported (Policy LP24 Provision of New Homes).	Support noted.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			392	17.2	The ambition to keep supply as high as in recent years must face the fact that most of the obvious big development opportunities have been used up in the last decade. See the 90% drop in anticipated completions in Nine Elms between the first and second five year periods.	Comment noted.	No change to the Local Plan required as a result of this representation.
Lois Davis	Co-ordinator Wandsworth Green Party			450	17.2	We note the Council's aspiration in 17.2 to maintain housing delivery that exceeds current housing requirements by 18%. It is unlikely that this excess includes genuinely affordable housing given the housing waiting list and homelessness levels in Wandsworth. Has the Council assessed the impact of this goal taking into account the environmental impact of overdevelopment and that overprovision of the wrong kind of housing will diminish opportunities to build the kind we really need?  While central government has reduced its backing to the BRE evaluation for residential properties, the Council could require a Home Quality Mark (HQM) rating for developments where currently the Local Plan only "encourages" residential building to meet HQM or Passivhaus. Thus there is no mandatory standard for sustainable residential development in the Local Plan. Bearing in mind the high proportion of (often luxury) residential development in the Borough, this is an extremely lax response to the climate and ecological emergency.	Policy LP25 (now LP23) Affordable Housing seeks to maximise the provision of affordable housing. Affordable housing will need to be delivered as part of any development delivering 10 units or more. The ambitious housing target will not adversely affect environmental ambitions of the Council. In accordance with policy LP57 (now LP55), major developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements.  BREEAM standards are robust evaluations which can demonstrate the quality of the dwelling built. Due to the technical requirements of HQM and Passivhaus it will not always be possible to achieve on sites, therefore it has been recommended to be encouraged as a requirement.	No change to the Local Plan required as a result of this representation.
Lois Davis	Co-ordinator Wandsworth Green Party			478	17.2	We note the Council's aspiration in 17.2 to maintain housing delivery that exceeds current housing requirements by 18%. We are concerned that with affordable targets that are significantly below the Mayor's recommended 50% of our housing provision fails to meet the local need for genuinely affordable housing. This is of particular concern given that 17.16 acknowledges that the median house price in Wandsworth was over 18 times that of the median salary in 2019.	The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.	Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.
Cyril Richert	Clapham Junction Action Group			1679	17.2	<b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b>  17. Providing Housing  17.2 page 276	The Housing and Economic Land Availability Assessment demonstrated that there is sufficient supply of sites to meet and exceed the housing requirement. Recognising that during the lifetime of this Plan, the supply of developable land available for residential development is likely to become much more limited, the 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	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Our ambition is to maintain this record and exceed the London Plan housing target</p> <p>Why trying to maintain such "record"? And especially why exceed?</p> <p>The Council's own Housing Delivery Trajectory and Managed Target43 shows a reduction of housing delivery within the next 12 years. With Nine Elms mostly constructed and many other brownfield lands having been intensively developed over the last 15 years, the existing trend is not sustainable with the preservation and enhancement of green space.</p> <p>The planners are aware of the challenge as the draft document says on par 17.9 "The Council also needs to take account of the need to ensure that sufficient land is available for other essential uses such as employment, education, health, retail and other community facilities", however it does not reflect on the consequences for the housing target ambition.</p> <p>An analysis of the figures provided by the planners44 highlight the disappearance of brownfield sites. Nine Elms makes a fourth of the housing target quotas, and once delivered in the next 5 years, will have a neglectable impact on future delivery. Beside Nine Elms, the borough relies heavily on the redevelopment of two large estates: Alton estate in Roehampton and the Winstanley/York Regeneration estates in Clapham Junction.</p> <p>In addition, as shown previously in this analysis and the draft Local Plan itself, the conjunction of Brexit and the Covid crisis is set to have long term consequences on the population living in London. As reported by accountancy firm PwC45 , London's population is set to decline for the first time in more than 30 years.</p> <p>17.2 Suggest removal of: "Our ambition is to maintain this record and exceed the London Plan housing target by keeping levels of delivery as close as possible to those achieved in recent years."</p>	<p>the housing requirement during the lifetime of this Plan.</p> <p>The housing target will not adversely affect environmental ambitions of the Council. In accordance with policy LP57 (now LP55), major developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements.</p> <p>The Local Plan takes account of the need to ensure that sufficient land is available for other essential uses. The capacity identified in the Housing and Economic Land Availability Assessment takes into account the need for other uses.</p> <p>The ONS population projections constitute the best available source of data about population projections.</p> <p>No impact for the Local Plan.</p>	
Dr Antonio Fidalgo				602	17.3	<p>"Wandsworth Council should make a greater effort towards improving the energy efficiency of their new-builds. Compared to other London boroughs its housing stock has far fewer 'A' and 'B' EPC homes.</p> <p>In a similar manner, the council should show a greater level of support towards self-build and residents that want to build to a passivehouse-standard as this is a great way to renew/improve the housing stock.</p> <p>At a title of example on passive house, Lambeth produced a very cost effective development at Akerman Road.</p> <p>The self-build register has a small number of people registered that should be supported in their efforts to build environmentally friendly homes. One of the ways that can be achieved is to allow people registered on self-build to identify unused spaces that belong to the council as potential sites for these high-energy efficient homes."</p>	<p>Policy LP24 (now SDS1) seeks to promote self/custom-built development. As of the 1st of December 2019 Wandsworth has 25 entrants on the Council's self-build register in total (based periods 1 - 5). The Council has granted planning permission for 71 CIL exempt dwellings since the start of the plan period, which indicates that a sufficient number of permissions have been granted to meet the demand.</p> <p>Policy LP10 seeks to promote increased design standards and where feasible, developers are encouraged to use accepted standards, such as the Home Quality Mark or Passivhaus, to demonstrate that higher design and operational aspects over and above those required by the Building Regulations have been incorporated.</p>	No change to the Local Plan required as a result of this representation.
Lois Davis	Co-ordinator Wandsworth Green Party			480	17.4	<p>We find the complex and sometimes contradictory narrative on housing provision fails to provide clear guidance on achieving the council's affordability targets. For example 17.4 outlines a commendable intention to make the provision of affordable family housing a strategic priority of the Local Plan and 17.17 recognises the need for affordable homes is significant in the borough. However a contradiction arises when 17.17 also finds the estimates of the Local Housing Need Assessment (LHNA) (2020) to be "significantly above the overall housing requirement that the borough can accommodate as established in Policy LP 24." and that "the Council will be unable to satisfy this level of need recognising that national policy requires the Council to set affordable housing targets that are realistic including in relation to development viability."</p>	<p>In accordance with the NPPF, the Local Plan Council should set affordable housing requirements that are realistic, including in relation to development viability and achieving mixed and balanced communities. Therefore, the affordable housing need identified in the Local Housing Needs Assessment (2020) cannot be considered in isolation to those requirements. Although it is acknowledged that the affordable housing need will be difficult to meet in full, the Local Plan seeks to maximise the provision of affordable housing.</p> <p>Part A of policy LP25 (now LP23) has been revised to remove the reference to the character and context of individual development proposals and to viability considerations. Site-specific viability information will only be accepted in exceptional cases, as set out in Policy H5 of the London Plan.</p> <p>Policy LP26 (now LP24) makes it clear that development proposals creating 10 or more units (gross), will be supported where 1 person/studio accommodation</p>	<p>Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.</p> <p>Policy LP25 (now LP23) amended to remove the reference to the character and context of individual development proposals and to viability considerations.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Another contradiction arises in relation to LP25 where point A states that the Council will seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable but contradicts this intention by continuing with the caveat that affordable targets will also have regard to the character and context of individual development proposals and to viability considerations. Thus LP25 B justifies a requirement for only 35% on individual sites outside of the VNEB OA and the much-criticised low level of 15% on individual sites within the VNEB OA is to be maintained. This leaves the Mayor's 50% target applicable only to public sector land on individual sites outside the VNEB OA where there is no portfolio agreement with the Mayor and on Industrial Locations where the inclusion of residential uses is considered appropriate.</p> <p>17.19 also contradicts the LP25 commitment to securing the Mayor's strategic target of 50 per cent of all new homes to be affordable in concluding that "Based on the most up-to-date evidence available it is proposed to adopt a borough-specific threshold approach as a starting point for informing individual applications, rather than that set out in the emerging London Plan." 17.19 also casts doubt on the council's real intentions when it advises that the Council will be updating its Local Plan Viability Assessment and Development Infrastructure Funding Study (DIFS) and that "Depending on the outcomes of this work, the Council may need to establish a different affordable housing target".</p> <p>he requirements for affordable housing tenure split are similarly ambiguous. 17.18 states that the 60% social rent/40% intermediate split has been challenging and 17.23 that "the Council considers that an equal split of 50% low-cost rented housing and 50% intermediate housing is the best approach to improving housing options in the borough." However LP25 C specifies that "The low-cost rent products should be Social Rent or London Affordable Rent [emphasis added]", that "The intermediate products should maximise the provision of London Living Rent and London Shared Ownership units." and that Shared Equity, Discounted Market Sale and Intermediate Rent are all intermediate products. 17.33 says that new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. To achieve this, it is stated that preference will be given to larger homes and that proposals which provide more than a small proportion of studios will not normally be supported. Confusingly</p> <p>17.33 then goes on to say that "a realistic approach is to allow for a proportion of new developments to contain studios up to a maximum limit." We could find no detail on what that limit should be. 17.36 says "While the dwelling mix of market and affordable homes is expected to reflect the preferred dwelling mix set out in this policy, rigid application of these requirements may not be appropriate in all cases". This seems to contradict the suggestion of a maximum limit.</p>	<p>does not exceed 5% of all market units. 1 person/studio accommodation will only be supported within the market element of the housing to be provided.</p> <p>Policy LP26 (now LP24) does not outline maximum limits for dwellings of different sizes, but instead outlines borough-level indicative proportions, which will be applied flexibly. When considering the mix of dwelling sizes appropriate to a development, the Council will have regard to individual site circumstances including location, the character of the area, site constraints, viability and the achievement of mixed and balanced communities.</p>	
Cyril Richert	Clapham Junction Action Group			1678	17.5	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>17.5 Page 277</p> <p>The affordable housing mix will mainly be focused on 1 and 2 bedroom dwellings, recognising the preferences of households on the Wandsworth's Housing Register.</p> <p>The current Core Strategy says:</p> <p>"It is crucial, as part of providing an overall balanced housing stock in Wandsworth, that the range of dwelling sizes available in the existing stock is maintained, particularly family housing with gardens. [...] The provision of affordable family housing is a strategic priority of the London Plan." 46</p> <p>The accuracy of the statement "1 and 2 bedroom dwellings, recognising the preferences of households" as this is likely to be due to the difficulty for Wandsworth to provide bigger units under the affordable regime. The current strategy explains that "Rising house prices in the borough have made it increasingly difficult to deliver intermediate housing which met the Council's</p>	<p>Policy LP26 (now LP24) does not indicate maximum limits for dwellings of different sizes, but instead outlines borough-level indicative proportions, which will be applied flexibly.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>previous requirement for two thirds of intermediate housing to be available to households with gross household incomes of £38,000 or less."</p> <p>The Covid crisis has also changed the perception of housing occupation and the development of working from home and flexible working use has highlighted the need for larger units.</p> <p>17.5 The planners are not flexible enough in their forecast and therefore we suggest: "The affordable housing mix will seek to adapt to the changing demand and therefore will encourage flexibility in the size of dwellings"</p>		
Mr Robert Arguile	Chair The Putney Society			394	17.9	'The Council also needs to take account of the need to ensure that sufficient land is available for other essential uses such as employment, education, health, retail and other community facilities'. Supported. How do policies in this plan provide for this despite the new GPDO right to convert business uses to residential? See also 17.11	Policies within the Local Plan set out both the protection of existing, and designation of sites appropriate for the development of additional development providing a range of different uses, including employment, education, health, retail and community facilities. It is recognised that the introduction of the new Permitted Development Right (PDR) enabling, subject to certain prior approval criteria, the change of use from Class E to dwelling houses (C3) has the potential to undermine some of these policy requirements. The Council is therefore considering proposals to take forward an Article 4 Direction to limit the extent of this PDR.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1339	17.11	We would like clarification on: - There appears to be confusion in 17.11- >17.13. 17.11 suggests housing demand (25,370) will exceed capacity (19,500). 17.12 appears to suggest it will exceed housing demand. 17.13 suggests a different target may be the most appropriate (30,590 over the next 10 years).	'25,370' referred to the objectively assessed local housing need figure, which is a 'starting point' for establishing the housing requirement for a Local Plan. The objectively assessed local housing need figure needs to be considered in the context of housing capacity, which accounts to 20,702 for years 1 to 10 of the plan period. Although, it is lower than the objectively assessed local housing need figure, it slightly exceeds the London Plan housing requirement (19,500). The Local Plan will therefore seek to deliver at least 19,500 homes between 2019/20 – 2028/29, as set out in the London Plan. Please note that the housing capacity figures have been revised following amendments to the Housing and Economic Land Availability Assessment.	No change to the Local Plan required as a result of this representation.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1547	17.14	<p><b>See attachment in representation 1534 for context</b></p> <p>Policy LP25 Affordable Housing – OBJECT</p> <p>L&amp;G support the Council's aspiration to update the Local Plan to align with the New London Plan including the threshold approach to affordable housing. Draft Policy LP25 Affordable Housing sets out this intention, however it is not clear why the measure of affordable housing is still being maintained by units not habitable rooms. This is inconsistent with the London Plan. Developers looking to bring sites forward will have to meet both units and habitable rooms to align with GLA and LBW thresholds which seems unnecessarily complicated recognising that this likely to be some variation between both measures. The metric of units for the calculation of affordable housing should be deleted.</p> <p>LP25 (Part C) L&amp;G support the Council's proposed tenure split 50% low-cost rent products and 50% intermediate products set out at LP25(C). Whilst this aligns with the New London Plan Policy H7, (30% low cost rent, 30% intermediate and 40% to be determined by the borough) and is supported by an updated Local Housing Needs Assessment, this tenure provision is yet to be tested in an updated local plan viability assessment to ensure this mix is viable and deliverable, it is recognised that this is subject to change following an up to date viability assessment being undertaken. L&amp;G would welcome inputting into the Local Plan Viability Study in accordance with the NPPF policy for plan making.</p> <p>LP25 (Part G) needs to be amended to align with the New London Plan which has removed this statement in the latest draft and now aligns with national policy supporting the use of Vacant Building Credit in specific circumstances.</p> <p>L&amp;G proposes the removal of text at paragraph 17.26 as it is ambiguous and unsound. Paragraph 4.5.14 of the London Plan requires late-stage review mechanism only with viability tested applications.</p>	<p>Paragraph 17.27 has been revised to align with the approach set out in the London Plan. That notwithstanding, applicants will be required to present affordable housing figures as a percentage of the total residential provision proposed by habitable rooms, by dwelling units, and by floorspace to enable comparison.</p> <p>The Council organised an engagement event on 5 May 2021 attended by surveyors, land owners, RPs, planning agents and property agents to inform the Whole Plan Viability Assessment.</p> <p>The use of Vacant Building Credit remains a constant concern given that it has significant scope to undermine affordable housing provision. Development in Wandsworth has been entirely on brownfield land in recent years; these brownfield sites have, in almost all cases, featured existing buildings. The vast majority of proposed site allocations feature existing buildings on site. Prior to redevelopment, almost all buildings are empty or redundant, so the VBC has the potential to be applied very widely and undermine the affordable target. The London Plan inspectors report recommended deletion of the London-wide Vacant Building Credit policy due to "insufficient evidence of the impact of disapplication of the Vacant Building Credit across London as a whole to justify a departure from national policy." However, the inspectors report recognised the acute need for affordable housing and the potential significant impact of the VBC, and notes that individual boroughs could pursue local dis-application of the VBC. The circumstances evident in the borough, particularly the scarcity of land and the significant need for affordable housing, justify a locally-specific approach.</p> <p>Paragraph 17.26 has been revised to align with the London Plan.</p>	<p>Paragraph 17.27 amended to clarify that affordable housing will be measured by habitable rooms.</p> <p>Paragraph 17.26 amended to align the approach set out in the London Plan.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Cllr. Paul White				968	17.18	<p>The Development Infrastructure Funding Study (DIFS) must ensure social infrastructure costs don't threaten the delivery of "much needed development," where high genuinely affordable home delivery is key.</p> <p>Alternative funding streams for social infrastructure to support new developments should be sought and the DIFS should have this as its aim, freeing developments to deliver higher levels of genuinely affordable housing.</p>	Comments noted.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1337	17.18	<p>The proportion of new build residences that are genuinely affordable should be 50% within the Vauxhall/ Nine Elms/Battersea Opportunity Area and outside it. (17.18 and LP25)</p>	<p>The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.</p>	Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.
Cyril Richert	Clapham Junction Action Group			1676	17.23	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>While failing to meet the target, Wandsworth could choose to enforce more drastically the requirements. Instead, the planners recommend to simply lower done the target51:</p> <p>17.23 For the reasons outlined above, the Council considers that an equal split of 50% low-cost rented housing and 50% intermediate housing is the best approach to improving housing options in the borough.</p> <p>17.23 We object to the change of target for housing split due to the previous failure of fulfilling housing commitments.</p> <p>We strongly reject the reasoning that by relaxing the targets, it would encourage a range of households.</p> <p>There is no sign in this Local Plan that Wandsworth will choose to divert from the current trend and unless this is added, the figures will only be seen as a component to be ignored.</p> <p>In the past, the Council has heavily relied on viability assessments to exempt developers to comply with the affordable housing provision. It is worth noting what the government inspector concluded in the latest Local Plan examination for the borough of Croydon:</p> <p>"Given that valuation is an art rather than a science, the presumptions inherent in the process mean that its apparent accuracy is sometimes misleading. Expert valuers frequently vary widely in their conclusions and margins of difference can be considerable. I do not attach greater significance to the Council's Local Plan Viability Assessment than it can bear"</p> <p>Similarly, we consider that viability assessments have been mostly used by developers to circumvent their planning obligations. We would like to quote the Battersea Society here52, which we find an accurate description of the process happening in Wandsworth:</p> <p>"It appears to us that developers routinely pay a price for land which assumes the Council will find their need for height and density to provide viability persuasive. Thus, there is a vicious circle of over-priced land and over-tall and dense buildings."</p> <p>Other London boroughs have been more ambitious in their aim to fulfil the requirement. Hammersmith &amp; Fulham Council's Viability Study of 2016, prepared to support its recently adopted local plan, observes the following at paragraph 6.11:</p> <p>"The results of our appraisals indicate that the adoption of a 50% affordable housing target is viable in some of the scenarios that we have tested."</p>	<p>The Local Housing Needs Assessment initially recommended an equal split of 50% low-cost rented housing and 50% intermediate housing. This was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The revised split has been viability tested as part of the Whole Plan Viability Assessment. The policy wording makes it clear that development proposals will need to comply with the proposed split. However, the application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p> <p>The approach to affordable housing outlined in Policy LP25 (now LP23) conforms to the 'threshold approach' set out in the London Plan. The 'threshold approach' provides certainty and consistency, as well as clear incentives for developers to increase affordable housing delivered through the planning system above the level in planning permissions granted in recent years.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>We fail to find similar testing in the Wandsworth Local Plan.</p> <p>LP25 Amendments should include:</p> <p>Information of all applicants that highest consideration will be given to the level of housing provision in respect to the Local Plan targets.</p> <p>Developers are expected to provide the split of affordable housing required by the housing targets, except exceptional circumstances.</p>		
Cllr. Paul White				970	17.24	<p>Pocket homes often see reduced rent/cost for a higher, per square metre, price. Pocket homes should be seen as a "niche" offering and only available where affordable housing need is low and integration and positive impacts on the local community can be proved and not just slightly reduced rents for homes that undermine GLA home size standards.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1340	17.24	We support the aim to "quantify need for tenures that offer an affordable route to home-ownership" but would like more clarity on how it will be achieved. (17.24)	The policy wording makes it clear that development proposals will need to comply with the proposed split.	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1045	17.26	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p>Kin proposes the removal of text at paragraph 17.26 as it is ambiguous and unsound. Paragraph 4.5.14 of the London Plan requires late-stage review mechanism only with viability tested applications.</p> <p>17.26 <u>Where applications are not considered to be maximising the level of affordable housing or</u> where it is proposing a tenure mix which is not policy compliant, the Council will consider the appropriateness of requiring review mechanisms at appropriate stages / milestone(s) of the construction period.</p> <p>Finally, it is not clear why the measure of affordable housing is still being maintained by units not habitable rooms. This is inconsistent with the London Plan. Developers looking to bring sites forward will have to meet both units and habitable rooms to align with GLA and LBW thresholds which seems unnecessarily complicated recognising that this likely to be some variation between both measures. The metric of units for the calculation of affordable housing should be deleted.</p>	<p>Comment on paragraph 17.26 is noted.</p> <p>The use of Vacant Building Credit remains a constant concern given that it has significant scope to undermine affordable housing provision. Development in Wandsworth has been entirely on brownfield land in recent years; these brownfield sites have, in almost all cases, featured existing buildings. The vast majority of proposed site allocations feature existing buildings on site. Prior to redevelopment, almost all buildings are empty or redundant, so the VBC has the potential to be applied very widely and undermine the affordable target. The London Plan inspectors report recommended deletion of the London-wide Vacant Building Credit policy due to "insufficient evidence of the impact of disapplication of the Vacant Building Credit across London as a whole to justify a departure from national policy." However, the inspectors report recognised the acute need for affordable housing and the potential significant impact of the VBC, and notes that individual boroughs could pursue local dis-application of the VBC. The circumstances evident in the borough, particularly the scarcity of land and the significant need for affordable housing, justify a locally-specific approach.</p>	Paragraph 17.26 amended to align the approach set out in the London Plan.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1548	17.26	<p><b>See attachment in representation 1534 for context</b></p> <p>17.26 <u>Where applications are not considered to be maximising the level of affordable housing or</u> where it is proposing a tenure mix which is not policy compliant, the Council will consider the appropriateness of requiring review mechanisms at appropriate stages / milestone(s) of the construction period.</p>	Comment noted.	Paragraph 17.26 amended to align the approach set out in the London Plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Charles Rose	City Planning			444	17.33	Paragraph 17.33 of the LBWPPDLP also recognises that in the case of studio accommodation it has a much more affordable monthly cost. Restricting these types of units would clearly have a knock on effect for the affordability of smaller units. The provision of more small units would reduce monthly costs.	New homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. Preference will therefore be given to larger homes, because proposals which provide more than a small proportion of studios are unlikely to achieve this objective. The policy however allows for a proportion of studios to be provided.	No change to the Local Plan required as a result of this representation.
Charles Rose	City Planning			443	17.40	b.Restricting 1 bedroom/studio accommodation Paragraph 17.40 of Policy LP28 of LBWPPDLP expressly states that the policy is not considered to undermine the potential for the provision of smaller dwellings. However, Criterion B3of the policy clearly does this by restricting the number of1 bedroom/studio accommodation to one unit to 1 in 5 in larger units. This approach runs contrary to the LPD2020 as it will compromise the ability to optimise sites and provide additional residential units. It places an additional constraint on house conversions to try and create larger units. As stated previously, properties lend themselves to certain layouts and configurations and the provision of one bed flats for 1 person and for 2 persons can often be an appropriate and sensible design led approach, whilst importantly catering for different household types (e.g. single occupants and couples). 1 bedroom and studio accomodation importantly contributes to creating mixed and balanced communities.	An approach to studios/bedsits (or indeed any policy) which was based on what the market wants would fundamentally undermine the planning system. Studios and bedsit units are not the most sustainable form of accommodation as they cannot meet a broad range of needs, e.g. families. Given the shortage of land in Wandsworth, it is not practical to prioritise these units; however, the policy does allow a small proportion of studios/bedsits to be provided. New homes should also contribute to supporting the creation of stable local neighbourhoods and cohesive communities. Preference will therefore be given to larger homes, because proposals which provide more than a small proportion of studios are unlikely to achieve this objective.	No change to the Local Plan required as a result of this representation.
University of Roehampton	University of Roehampton	Henry Brown	Turnberry Planning	1561	17.51	<p><b>See attachment for representation with appendix and full context</b></p> <p>Status of Roehampton Vale Campus in the Local Plan</p> <p>Having its engineering programme split across two campuses remote from each other represents an unsatisfactory position for the University in terms of travel times and student experience. As part of an ongoing programme of development, the University wishes to consolidate academic activity in Kingston, with the Vision for the Estate anticipating its Engineering facilities being consolidated by reorganising and developing the existing campus at Kingston Hill, some 400m from the Roehampton Vale campus, although in the neighbouring borough.</p> <p>The Draft Local Plan: Pre-Publication Version acknowledges this aspiration, and in the supporting text for Policy LP30 Purpose-Built Student Accommodation at paragraph 17.51 states "Kingston University aims to relocate its existing teaching facilities from Roehampton Vale to the Royal Borough of Kingston upon Thames and use the site Roehampton Vale site for student accommodation". Whilst the University does aim to relocate its existing teaching facilities from Roehampton Vale, there is no longer a specific aspiration to redevelop the campus for student accommodation, and the University considers that this is only one of several possible outcomes for the site. The University therefore requests that the reference to repurposing the site for student accommodation is removed from future versions of the Plan, and that the site is instead allocated for residential development, including the possibility of student accommodation provision. The current text and lack of designation is unclear and the Plan is currently not Effective in this regard.</p> <p>Whilst the proposed consolidation of the University's engineering facilities at Kingston Hill remains the University's aspiration, the timing of such a move is uncertain at this stage. The consolidation will require a reorganisation of the Kingston Hill Campus and planning permission for a range of works. This series of steps is complex and needs to be joined up with wider changes across the University. It is expected that the relocation will take place during the next ten years in the later stages of the Plan period.</p>	Comment noted. It is agreed that the supporting text of policy LP30 (now LP28) should be revised.	Supporting text of policy LP30 (now LP28) amended.
	C B R E	Mr Will Lingard		416	17.70	We welcome that the explanatory text recognises the need to support modernisation of existing facilities. The way that the text is worded and the use of 'However', suggests that the Council recognises that there will be circumstances where a net loss is acceptable. If that is the intention of the text then we support this paragraph but would like clarification of this point to be included. If that is not the intention then the text should recognise that in achieving no net loss that site constraints and costs, especially for charities within this sector, will mean that this aim may not be viable. The policy wording in that scenario would be unsound as currently drafted as it does not contain	It is agreed that the supporting text should recognise the special circumstances of specific development proposals.	Supporting text of policy LP33 (now LP31) amended to state that flexibility will be applied when considering proposals which result in a net loss of floorspace.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>sufficient flexibility. The quality of existing accommodation will vary from site to site, as will the circumstances of the operator to make necessary improvements. This needs to be better understood through viability evidence. The policy wording should therefore account for this and also the role that enabling development might play. The text could be amended as follows,</p> <p>“This policy seeks to resist the loss of various forms of specialist accommodation so that the level of provision in the borough is not reduced. However, the Council recognises the changing nature of care provision for older, vulnerable and homeless people. Where existing specialist accommodation does not meet modern standards, the Council will support its re-provision or modernisation to ensure the provision of high quality specialist accommodation which better meets the needs of older, vulnerable and homeless residents. The particular circumstances of each site will be taken on its own merits when considering qualitative improvements and the Council's preference for no net loss of existing units.”</p>		
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1342	17.70	- Does 17.70 commit the council to spend money on upgrading specialist accommodation for older, vulnerable, and homeless residents. (17.70)	This paragraph sets out the Council's approach to redevelopment of any site which includes specialist and supported housing.	No change to the Local Plan required as a result of this representation.
Michael Leigh				45	Policy LP24	I would wish the plan to contain a commitment by the Council to address its housing needs by building council housing, wherever and whenever it is possible, to Parker/Morris or similar standards.	The Local Plan will promote the regeneration and estate renewal of the York Road and Winstanley Estate in Clapham Junction and the Alton Estate in Roehampton to improve the quality of life for existing residents by upgrading the ageing housing stock, providing new affordable housing, addressing overcrowding and providing an improved public realm and local amenity.	No change to the Local Plan required as a result of this representation.
Lois Davis	Co-ordinator Wandsworth Green Party			479	Policy LP24	We are concerned that house price increases in the borough may be a result of over-provision of luxury properties driven by the area strategies laid out in LP24 where by far the greatest supply of units is in the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB OA), an area where only 15% affordable housing is required. LP24's area strategies may also contradict the intentions outlined in 17.5 for development proposals to take into account the existing housing stock in the neighbourhood in order to avoid any over-concentration of a single type or size of homes.	<p>The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.</p> <p>Policy LP26 (now LP24) Housing Mix requirements developments to avoid an over-concentration of a single size of homes.</p>	Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.
Mr Robert Arguile	Chair The Putney Society			393	Policy LP24	The target for Putney seems reasonable, but <u>Roehampton needs much better transport</u> before nearly 1000 new homes can be built.	The Roehampton's housing capacity was informed by the Housing and Economic Land Availability Assessment.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			812	Policy LP24	<p><b>LP 24 Provision of New Homes</b></p> <p>We cannot see how housing targets will be achieved without massive and inappropriate densification of current residential areas. As the amount of land available in the borough for large-scale residential development continues to fall, this pressure will increase.</p> <p>Wandsworth completed 2,735 new homes in 2015-16, but since then provision has fallen by over a thousand. Although Wandsworth exceeded in 2017-18 and 2018-19 the housing delivery target of 1,812 set in the London Plan, in 2019-20 it fell short by 276 (17%). The target has now risen to 1,950<sup>[1]</sup>, and if the Government implements the new targets announced in December 2020, it will rise to 3,425 by the time the next Local Plan has to be prepared. The figures presented in LP24 (and repeated in Table 17.3) for new housing in the five years up to 2027-28 and the ten years to 2033-34 show new housing of 20,702 over the full ten years. Just under two thirds of them will be provided in the areas covered by the seven Area Strategies, the vast majority in Clapham Junction/York Road/Winstanley, Wandsworth Town, and Nine Elms. But over a third will be in other areas, unidentified in the Plan.</p> <p>[1] The explanation of the London Plan targets given in para 17.2 is repeated in para 17.8</p>	The Local Plan needs to be read as a whole. It seeks to create a positive framework for managing growth over the plan period. The policies contained in the Plan are designed to prevent and mitigate the impacts of densification, while seeking to maximise opportunities for sustainable travel. There is no evidence to indicate that the housing requirement will lead to inappropriate densification of current residential areas.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr James Thompson	Director Northport FPR Limited	Mr Kevin Goodwin	KG Creative Consultancy	439	Policy LP24	<p><b>Finally the Conclusions state:</b></p> <p>The housing and economic land availability assessment has assessed potential sites in the borough and their expected future land use, density and timescale for development.</p> <p>The assessment shows that the needs for housing and office floorspace can be met.</p> <p>27. In our view this conclusion cannot be relied upon in any manner, in the absence of any evidence to underpin such a bold statement on housing matters. The evidence base on housing is therefore flawed and unsound.</p> <p>28. This is compounded in what is said above in relation to the comment from the evidence base referred to in paragraph 23, that the assessment "does not allocate particular sites for particular forms of development". However this is what the draft local plan does. As an example in the 'Area Strategy for Putney' and starting at page 135 there are site allocations that include allocations for "Mixed use development including residential...". Although this does not specifically include numbers these sites contribute to the overall Housing number in draft Policy LP24 that refers to overall 182 new dwellings for Putney. It is clear that at some point a capacity exercise has been undertaken for these allocated sites, but not published.</p> <p>29. Further paragraph 17.11 of the draft local plan states "However, meeting the objectively assessed local housing need figure (25,370) poses a significant challenge. The Council recognises that its objectively assessed housing need is far in excess of its identified sources of housing capacity". The draft local plan therefore fails to meet its OAN as a whole. Even so in failing to do that it fails to identify in a transparent manner how will provide the housing that it does allocate for.</p> <p>30. In addition in relation to housing delivery this relies significantly on dwellings coming forward from the VNEB area and also historic permission being built out. The majority of development in this area is within high builders and therefore flatted development with limited dedicated amenity space. This does not address the undersupply of self-contained houses with their own private amenity in the London Boroughs. The importance of outdoor space associated with dwellings, highlighted by the pandemic of the last 12+ months, is an important asset. The proposal for the Fawe Park Road site will deliver a significant number of family sized homes, with private gardens and other outdoor space.</p> <p>Conclusion</p> <p>31. We have identified above a number of matters that we feel are fatal to the draft local plan on nature conservation and the delivery of housing during the plan period. The Council have failed to update any database that they may hold in respect of the value of the subject site for nature conservation. Accordingly we can only assume on the basis of the evidence that is available that they have erroneously dismissed its potential contribution to housing supply in the Borough.</p> <p>To address these findings the subject site should be allocated for housing.</p>	<p>The Housing and Economic Land Availability Assessment has been revised. It now adopts a design-led approach to defining site capacities as advocated by London Plan policies GG2.D and D2. The methodology is set out in the Urban Design Study. The revised HELAA includes capacity estimates for all identified sites.</p> <p>Capacity estimates have been added to all Site Allocations, in accordance with the London Plan. The figures provide clarity with regard to the expected housing and commercial yields from all Site Allocation. The Housing and Economic Land Availability Assessment and policy SDS1 show that there is sufficient capacity to meet the borough's housing requirement.</p> <p>Despite changes to the Standard Method, the objectively assessed local housing need figure continues to be a 'starting point' for establishing the housing requirement for a Local Plan.</p> <p>All self-contained housing units will be required to address the requirements set out in policy LP29 (now LP27). The policy requires that self-contained housing units meet all requirements for housing standards set out in the London Plan, including the provision of external private amenity space.</p>	<p>Capacity figures added to Site Allocations</p> <p>Housing and Economic Land Availability Assessment revised to include capacity information for all identified sites</p>
Kin Development		Ben Ford	Director Quod	1043	Policy LP24	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p>	<p>Despite recent changes to the Standard Method, the objectively assessed local housing need figure continues to be a 'starting point' for establishing the housing requirement for a Local Plan. The housing requirement for the borough also needs to be informed by the findings of the Housing and Economic Land Availability Assessment. This is set out in more detail in policy SDS1.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>Policy LP24 Provision of New Homes – OBJECT</b></p> <p>Policy LP24 states that the Council will need to deliver a minimum of 1,950 homes per year by 2028/2029. To achieve 20,702 homes by 2033, optimisation of all current development sites across the borough is required. Whilst we note this figure is derived from Table 4.1 - 10 year targets for net housing completions (2019/20 -2028/29) of the London Plan, we would urge the Council to review its minimum housing requirement in light of the Government's published figure (using the standard methodology) of 2,586homes per year, or 3,059 homes per year using the revised methodology.</p>		
Spencer Barnshaw	Secretary Battersea and Wandsworth Trades Union Council			1150	Policy LP24	<p>Chapter 17 – Housing</p> <p>LP24 - Provision of New Homes</p> <p>BWTUC welcomes the commitment to achieving the housing targets set out in the London Plan but notes that the figures quoted are lower than those in the current iteration of the draft London Plan- 19k as against 23k. We would expect the higher figure to be achieved.</p> <p>We would, however, urge that every effort be made to meet the even higher need derived from the local needs assessment.</p> <p>We also note that the provision of new housing appears to be heavily dependent on redevelopment of existing council estates. We would like to see a commitment that such development not be carried out without the overwhelming consent of existing residents on those estates including tenants of private landlords on those estates.</p> <p>Efforts to find brownfield sites suitable for housing development should be intensified.</p>	<p>The London Plan sets out a housing target for the borough of 19,500 homes between 2019/20 – 2028/29. The comment refers to an earlier iteration of the draft London Plan.</p> <p>The requirement for a ballot of residents is not a matter for the Local Plan to address; however the need for engagement is embedded throughout the Plan.</p> <p>The Local Plan will prioritise the redevelopment of brownfield land, vacant and underused buildings for new housing and workspace, along with optimising the development of both strategic and smaller sites across the borough, including through their intensification. This is set out in Policy SS1 (now SDS1).</p>	No change to the Local Plan required as a result of this representation.
VSM Estates	VSM Estates	Freya Turtle	Associate Director Turley Associates	1065	Policy LP24	<p><b>For full context, see the attachment with comment 1058</b></p> <p>Policy - LP24 Provision of New Homes</p> <p>London Plan conformity - VSM supports the need to deliver a minimum of 1,950 new homes per year, as this is consistent with London Plan Policy H1.</p> <p>LP24 seeks to deliver 6,752 homes at Nine Elms (which is inconsistent with Policy PM3, which gives a figure of 6,912). VSM suggests that Policy LP24should also reference the need to meet the overall housing target for the Vauxhall Nine Elms Battersea Opportunity Area, which is 18,500 (London Plan Table 2.1) over the Local Plan period.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - No comment.</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - Policy LP24 should also reference the need to meet the overall housing target for the Vauxhall Nine Elms Battersea Opportunity Area, which is 18,500 (London Plan Table 2.1) over the Local Plan period.</p>	Policy PM3 includes an appropriate reference to the housing capacity of the Opportunity Area Planning Framework, in accordance with the London Plan.	Housing capacity figure for the VNEB OA corrected.
Mr Andrew Simpson	Planning Director South West London and St	Anna Russell-Smith	Senior Planner Montagu Evans	1257	Policy LP24	<p><b>See attachment on comment 1256 for full representation</b></p> <p><b>Delivery of Residential Accommodation</b></p>	<p>Support noted.</p> <p>The 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</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	George's Mental Health NHS Trust					<p>The draft Local Plan identifies the following housing strategic objective:</p> <p><i>"The borough's important stock of family-sized homes will have been retained and their local neighbourhoods enhanced. We will have supported the delivery of a significant number of new homes of high quality and sustainable design to meet the needs of local people. We will have delivered a range of homes, including a diversity of affordable home offers, to suit the needs of a diverse range of households, from young professionals to older people, families of all ages, and valued key workers who will be looking to either rent or buy so that they can live in the borough."</i></p> <p>This strategic objective aligns with paragraphs 61 to 64 of the NPPF which identifies the need for residential accommodation to provide a range of housing types, size and tenure. The strategic objective set out above is also reflective of Policy GG4 (Delivering the homes Londoners need) of the new London Plan which requires those involved in planning and development to ensure that more homes are delivered, which support the delivery of genuinely affordable homes and create mixed and inclusive communities. The alignment of the LBW's housing objectives with the NPPF and the London Plan is supported.</p> <p>Draft Policy LP24 (Provision of New Homes) deals specifically with the delivery of housing within the Borough and prescribes a housing target of 1,950 new homes a year by 2028/2029, which reflects the new London Plan identified housing target. For the LBW this equates to 19,500 units over a ten year period. Consultation has recently been undertaken (October 2020) on a revised methodology for calculating housing need. The revised methodology identifies an indicative housing requirement of 3,425 units per annum. This strongly suggests that the direction of travel for housing targets within the LBW are set to increase and LBW will need to either identify new locations for development and / or intensify and optimise the quantum of development of those sites previously identified. It is recommended that LBW explore at the earliest opportunity provisions to support the potential increase in their identified housing need. This will ensure that the Local Plan can robustly address the likely increased housing need.</p> <p>Part c of draft Policy LP24 identifies that the Council's housing target will be achieved through a number of strategies including requiring development proposals which involve new housing to demonstrate that the use of the building/site has been optimised through a design-led approach.</p> <p>The Springfield Hospital site has approval for 839 residential dwellings (of which 262 are conversion) on the Site. The SWLSTG welcomes the Council's acknowledgement of the importance of ensuring the delivery of housing is optimised across the Site (through a design-led approach) to assist in achieving housing targets. In light of LBW anticipated increased housing targets, SWLSTG encourages the Council to consider favourable the intensification of existing Sites where it can be demonstrated that achieving additional residential accommodation on deliverable and sustainable brownfield sites can be delivered through a high quality design-led approach.</p>	<p>identifying opportunities to maximise delivery through estate improvement, renewal and regeneration. All these measures will create strong foundations to meet and exceed the housing requirement during the lifetime of this Plan.</p> <p>Despite recent changes to the Standard Method, the objectively assessed local housing need figure continues to be a 'starting point' for establishing the housing requirement for a Local Plan. The housing requirement for the borough also needs to be informed by the findings of the Housing and Economic Land Availability Assessment. This is set out in more detail in policy SDS1.</p>	
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1306	Policy LP24	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP24 - Provision of New Homes</b></p> <p>We support the Councils approach in delivering new homes within the Borough and commend officers on seek to exceed the minimum number of homes identified within the New London Plan Publication Version (2020).</p> <p>We acknowledge that the targets are challenging and Opportunity Areas and Areas of Intensification are going to play a key role in delivering the vast majority of new homes. While we appreciate that the Council has set out specific area strategies we strongly recommend that the policy is also amended to identify Opportunity Areas and Areas of Intensification as the main location for new development.</p>	<p>The 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. All these measures will create strong foundations to meet and exceed the housing requirement during the lifetime of this Plan.</p> <p>Despite recent changes to the Standard Method, the objectively assessed local housing need figure continues to be a 'starting point' for establishing the housing requirement for a Local Plan. The housing requirement for the borough also needs to be informed by the findings of the Housing and Economic Land Availability Assessment. This is set out in more detail in policy SDS1.</p> <p>Policy SS1 Spatial Development Strategy identifies the Nine Elms Opportunity Area and Wandsworth Town (including the Wandle Delta sub-area as the main locations for growth.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Setting this context from the start will help push the agenda for new homes within these important locations. This approach is replicated by numerous policies within the New London Plan Publication Version (2020) focussing around the Good Growth agenda.		
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1515	Policy LP24	Policy LP24 Provision of New Homes helpfully includes a table of housing supply for each area strategy. It identifies an overall ten-year supply to 2032/33 of 20,702 homes. Approximately, 58% of the supply is concentrated in three growth areas: Nine Elms (6,752 homes), Wandsworth Town (3,472 homes) and Clapham Junction (1,714 homes). In addition to providing additional healthcare capacity in these growth areas, there is the need to address the cumulative impact of development in other areas.	Comment noted.	No change to the Local Plan required as a result of this representation.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1546	Policy LP24	<b>See attachment in representation 1534 for context</b>  Policy LP24 Provision of New Homes – OBJECT  Policy LP24 states that the Council will need to deliver a minimum of 1,950 homes per year by 2028/2029. To achieve 20,702 homes by 2033, optimisation of all current development sites across the borough is required. Whilst we note this figure is derived from Table 4.1 - 10-year targets for net housing completions (2019/20 -2028/29) of the London Plan, we would urge the Council to review its minimum housing requirement in light of the Government's published figure (using the standard methodology) of 2,586 homes per year, or 3,059 homes per year using the revised methodology.	Despite recent changes to the Standard Method, the objectively assessed local housing need figure continues to be a 'starting point' for establishing the housing requirement for a Local Plan. The housing requirement for the borough also needs to be informed by the findings of the Housing and Economic Land Availability Assessment. This is set out in more detail in policy SDS1.	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			396	Policy LP25	Taking a long term view all new homes may change tenure during the lifetime of the building. We recognise that this is outside the Council's control, but funding 'affordable' homes almost solely by this tax on new builds makes them less affordable for everyone else.	Comment noted. The approach to affordable housing is in general conformity with the NPPF and London Plan.	No change to the Local Plan required as a result of this representation.
Mr Angus Robertson	member Alton Action			564	Policy LP25	Comment on LP25 Affordable Housing, A:  This policy – seeking to achieve 50% of affordable housing – has not been applied to the proposed development for the Alton Estate.  If the policy is supposed to consider the 'context' of the local development then how can the objective of 50% affordable not be applicable for a development in an area of significant deprivation, where a higher than average proportion of people are on low incomes?	Comment noted. The application of policies is a Development Management issue rather than a matter for the Local Plan to address.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			813	Policy LP25	<b>LP 25 Affordable Housing</b>  The HNA notes that there are 8,800 households on the Council's Housing Register, and estimates that there is a need for nearly 3,600 affordable homes each year over the Plan period, nearly twice the overall target for new homes. Despite such high levels of demand, the Council has a long record of failure in seeking to meet even its current targets of 33 per cent affordable homes across most of the borough and a deplorable 15 per cent in Nine Elms. Policy LP 25 now states that the Council will "seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable", subject to viability constraints. Achieving that target across the borough will be especially difficult for a number of reasons:  <ul style="list-style-type: none"> <li>The minimum thresholds set are 15 per cent in Nine Elms, 35 per cent in most of the rest of the borough, and 50 per cent only on public and currently-industrial land (the latter two minima as in the London Plan). We deplore the proposal to continue the 15 per cent target for Nine Elms, especially since nearly half the new homes expected to be provided in the borough over the five years 2023-24 to 2027-28 will be in that location. We cannot understand how those thresholds are consistent with the overall 50 per cent target.</li> <li>The Council's record over the past decade suggests that viability assessments repeatedly conclude that even the minimum thresholds are unachievable.</li> </ul>	The application of policies is a Development Management issue rather than a matter for the Local Plan to address.  The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.  The affordable housing tenure split has been informed by the Local Housing Needs Assessment. The study includes a justification behind the recommended policy approach. This is summarised in a greater detail in the supporting text of the policy.  London Affordable Rent homes will be implemented in line with the London Plan. The rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.  Paragraph 17.27 has been revised to align with the approach set out in the London Plan. That notwithstanding, applicants will be required to present affordable housing figures as a percentage of the total residential provision proposed by habitable rooms, by units, and by floorspace to enable comparison.	Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.  Paragraph 17.27 amended to clarify that affordable housing will be measured by habitable rooms.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>The Government's proposal to increase from 10 to 50 the minimum number of homes to be built on a development site that must commit to providing affordable housing.</li> </ul> <p>We strongly regret the Plan's failure to adopt a tenure split for affordable housing of 60 per cent affordable rent and 40 per cent intermediate products, in favour of a 50:50 split. And we reject the reasoning provided, that a 50:50 split "will help to bridge the housing offers available to a range of households"; and that a 60:40 split would fail "to consider the importance of creating mixed and balanced communities". The latter argument is especially perverse in the light of the evidence presented above about population and migration. We acknowledge that the London Plan includes London Living Rent in the intermediate tenures rather than the affordable rent category, which affects the balance between them. But we also note that London Affordable Rents have tended to be set at a higher level in Battersea than in neighbouring boroughs; and that evidence suggests that intermediate tenures such as equity sharing have not met the policy goal of providing a route to home ownership.</p> <p>We also regret that the Plan does not accept the London Plan policy that that the proportion of affordable housing in a scheme should be measured by habitable rooms, in order to ensure that affordable homes are delivered in a range of sizes, including family-sized homes. We reject the Council's view that it is more appropriate to measure affordable housing by units. Measuring in that way provides an incentive to provide too many small units, especially studio accommodation and one-bedroom flats.</p>		
Cllr. Paul White				656	Policy LP25	<p>Wandsworth must also deliver for medium earning key workers, such as teachers and NHS staff, currently stranded in expensive, sub-standard private rented accommodation with the constant threat of eviction which is freely available to a landlord.</p> <p>Rents based on a maximum of one third of actual wages would help single key, senior and young lower waged workers, plus more emphasis on lower than "affordable" rents such as London Living Rents, as a stronger rival to shared-ownership, which is not suitable for many.</p> <p>Regenerating council estates with high levels of private builds, will have a tendency to alter the demographic of the estate and the need to regenerate housing should be examined against the standard of the current fabric and possibilities to maintain, adapt and retro-fit, and regenerations should adhere to the London plan target of 50% affordability.</p> <p>When demolishing someone's home, it is only reasonable to expect the household to express a view on whether this is acceptable or not. Therefore, all regens should be prefaced by a ballot in line with London Mayor's expectations. This will release substantial funds for social and affordable home builds.</p> <p>Bringing forward much needed social homes and genuinely affordable homes (London living rents and much reduced market rents) to ensure a properly balanced community, that respects the current socio-economic demographic make-up of the local community, must be prioritised.</p> <p>This must also be achieved by encouraging smaller Housing Associations that work with marginalised and under-represented groups.</p> <p>Affordable home tenants should be able to opt-in/out to on-site facilities offered to private households on developments that have additional facilities such as gyms and swimming pools, "poor doors" should be avoided and developments should maximise tenure integration with "pepper potting" expected in all developments.</p>	<p>Essential Local Workers are important economically in providing the social infrastructure which enables business to flourish. The affordable housing split takes into account the needs of Essential Local Workers, which is discussed in more detailed in the Local Housing Needs Assessment.</p> <p>The need for engagement is embedded in a number of policies. Policy LP1 encourages a developer-led public engagement in advance of the submission of a planning application. The requirement for a ballot of residents is not a matter for the Local Plan to address.</p> <p>Policy LP29 (now LP27) requires that 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. Proposals will be required to demonstrate that this approach has been considered from the outset of the design process.</p> <p>Comment on Housing Associations is noted; however, it is not a matter for the Local Plan to address.</p> <p>It is agreed that affordable home tenants should be able to opt-in/out to on-site facilities offered to private households on developments that have additional facilities.</p>	Supporting text of Policy LP29 (now LP27) expanded to clarify that affordable home tenants should be able to opt-in/out to on-site facilities offered to private households on developments that have additional facilities.
Councillor Graham Loveland	Labour Group			650	Policy LP25	<p>It is manifestly evident from the Local Housing Needs Assessment that forms part of the Plan's evidence base that there is a substantial unmet need for social rented/London Affordable Rent housing. The ongoing shortfall in adequate provision results in overcrowding, social breakdown and exacerbates health inequalities, as well as an overreliance of private rented accommodation</p>	<p>Policy LP25 (now LP23) seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. This will ensure that new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						that is not always of a decent standard. We are also concerned that the structure of shared equity products is dependent on continually rising property values, so that the leaseholder can bootstrap themselves up as the market rises. When the market falls, they lose, rather than gain equity share. Since the property market is inherently cyclical, there are inevitably going to be periods when this happens, to the disadvantage of the leaseholder. We propose that para C of policy LP25 Housing Mix is amended to require 70% low-cost rent products and 30% intermediate products. This will necessitate changes to the supporting text. We also ask that para H of this policy, concerning 'tenure blind' development be strengthened to refer to landscaped areas, pathways and any parking areas. We propose a new policy in relation to sites providing fewer than 10 units: On sites providing fewer than 10 units (gross), a financial contribution towards the delivery of off-site affordable housing will be sought, in line with the council's preferred methodology. Viability will be tested on a case by case basis.	communities. The affordable housing tenure split has been informed by the Local Housing Needs Assessment (2020). The study initially recommended an equal split of 50% low-cost rented housing and 50% intermediate housing. This was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The study includes a justification behind the recommended policy approach.  Paragraph 63 of the NPPF states that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).	
Cllr. Paul White				969	Policy LP25	The proposal to cut the affordable housing mix of 60/40% social/intermediate housing to  50/50%, so bowing too easily to "viability" arguments used to cut affordable home delivery, must be resisted.  The London Plan gives scope to allow delivery of 70/30% social/intermediate housing within the affordable homes mix, this would see a target of 6,343 social rent homes to 2038 and 2,719 intermediate homes (given delivery of 25,891 homes in Wandsworth to 2038), with the potential for these targets to rise through adhering to the London Mayor's strategic targets of 50% affordable homes in developments, especially on public land.  This would double the amount of social housing suggested to be delivered in the draft Wandsworth Plan, but would still be well short of the Local Homes Needs Assessment report produced in December 2020 by GL Hearn.  Delivery of sustainable, social and affordable homes should be the highest priority when negotiating with developers, with payments in lieu reflecting the cost of building a new sustainable social rent home, rather than unrealistically lower figures currently tolerated.	Policy LP25 (now LP23) seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. This will ensure that new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The affordable housing tenure split has been informed by the Local Housing Needs Assessment (2020). The study initially recommended an equal split of 50% low-cost rented housing and 50% intermediate housing. This was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The study includes a justification behind the recommended policy approach.  Cash in lieu contributions will be collected in accordance with the Planning Obligations SPD and the London Plan.	No change to the Local Plan required as a result of this representation.
Cllr. Paul White				966	Policy LP25	Exceeding GLA housing build targets, has meant an over-preponderance of expensive private owner-occupied homes in Wandsworth, at the expense of much needed homes that average and lower earners could afford to rent or buy.  This plan should see delivery of more mixed and balanced communities, increasing social rent homes numbers especially.  Post-war it was determined that social rent homes should be available for the lowest 30% of income earners in the country. It is therefore disappointing to see this document state that social housing should be the preserve of households (especially those with children) earning £25,000 a year or less. If the 30% figure was adhered to, incomes up to £33,000 would be expected to occupy social homes thus assisting the lower paid service and key workers and people facing employees who served Wandsworth so well during this pandemic, but find Wandsworth so expensive.  The last 15 years has seen a delivery rate of only 5% social rent homes of all homes built in  Wandsworth, this figure must be improved upon, as waiting lists have ballooned to 9,200, from 5,000 less than 6 years ago and homeless households have grown from 435 eleven years ago to over 2,500 now.	The Local Plan does not restrict social housing to households earning £25,000 a year or less. The supporting text of the policy (REG18 version of the Plan) stated that the Greater London Authority's (GLA) 'Housing in London' (2019) report indicates that households moving into social housing (including Affordable Rent) have by far the lowest incomes, with half of them on less than £13,000 a year and the vast majority (approximately 90%) on less than £25,000 a year. For this reason, it is likely that low-cost rent products will generally be available to households earning £25,000 a year or less. Nevertheless, London Living Rent (intermediate tenure) will help in meeting the need of the remaining lowest 30% of income earners. The income required to afford London Living Rent dwellings starts at around £24,000, rising to around £33,600 for a 3-bedroom home.  Essential Local Workers are important economically in providing the social infrastructure which enables business to flourish. The affordable housing split takes into account the needs of Essential Local Workers, which is discussed in more detailed in the Local Housing Needs Assessment (2020).  The application of policies is a Development Management issue rather than a matter for the Local Plan to address.  Wandsworth Housing Strategy 2019-2022 sets out the borough's priorities for housing and homelessness services.	No change to the Local Plan required as a result of this representation.
Cllr Graeme	Cllr Earlsfield Labour Party			924	Policy LP25	Genuinely Affordable Housing  LP25	Policy LP25 (now LP23) seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. The low-cost rent products, including Social Rent or London Affordable Rent, are intended for low-income households.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Henderson and Cllr Rigby						In particular, whilst we welcome the addition of "affordable" homes to the local area we remain concerned that they should be genuinely affordable to local residents and people who work in the Borough. We would like to see a significant increase in the proportion of genuinely affordable homes in all developments in the Borough and Earlsfield and believe they should be rented at council rent levels, especially as homelessness rises in the borough.		
Hassan Ahmed	GLA			1098	Policy LP25	<p><b>Affordable and Specialist Housing</b></p> <p>Wandsworth's commitment to meet the Mayor's 50% target for affordable housing as set out in policy LP25 is very welcome, however the purpose of the threshold approach is to limit the requirement for viability evidence to those instances where there are real barriers to delivery.</p> <p>The Mayor's threshold approach sets the threshold level for affordable housing at 35% on privately owned land and 50% on publicly owned land or on industrial land where development proposals would result in the loss of industrial capacity. It should be noted that these figures are not targets but rather they are the thresholds above which viability assessments are no longer required as part of the planning process. As currently drafted it appears that it may be the borough's intention to viability test all residential planning applications which would not be in line with the Mayor's threshold approach. However, at paragraph 17.19 of the draft Plan it states that '...it is proposed to adopt a borough specific threshold approach as a starting point for informing individual applications, rather than that set out in the emerging London Plan.' So, it is not entirely clear if it is the borough's intention to set its own independent threshold levels for affordable housing or whether there will be a requirement for viability evidence for all residential proposals in order to seek the maximum reasonable amount of affordable housing.</p> <p>The Mayor would like clarity on this matter which may or may not constitute an issue of nonconformity with the PLP. To be consistent with the approach in the PLP, viability should only be considered as part of planning applications where the proposed amount of affordable housing falls below the thresholds set out above and part A of draft policy LP25 should be revised accordingly.</p> <p>As set out in PLP Policy H5, the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family sized homes. This is because habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. In contrast, paragraph 17.27 of the draft Plan sets out the intention to continue to calculate affordable housing in terms of numbers of dwellings. There is no explanation for this approach, nor is there evidence to support it, and it creates a significant disincentive for the delivery of family sized affordable homes. For consistency the draft Plan should seek to measure affordable housing by habitable rooms rather than by units and draft Policy LP25 should be amended accordingly.</p> <p>The draft Plan could do more to accommodate the Mayor's preference for maximising social rented housing given the need for this type of tenure across London. The Council's proposed tenure split of 50% low cost rent and 50% intermediate products is within the limits set out in Policy H6 of the PLP but the proposed levels should be based on local and up-to-date evidence.</p> <p>It is understood that the Council undertook a Local Housing Needs Assessment last year (2020). This indicates that Wandsworth has a greater need for social rented rather than intermediate housing but could allocate up to 50% of the affordable housing split as intermediate tenures 'as long as future policies prioritise London Living Rent over Affordable Rent dwellings at 80% market discount' and this should be reflected in the draft Plan, specifically draft Policy LP25 part C. The borough's proposed approach to the tenure split should be supported by up-to-date viability evidence.</p> <p>Draft Policy LP25 sets a 15% affordable housing target in the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area (OA). The VNEB OA Planning Framework was adopted in March 2012 and was supported by a Development</p>	<p>Policy LP25 (now LP23) has been amended to clarify that it is not the Council's intention to viability test all residential planning applications. The revised wording of the policy makes it clear that viability evidence will only be required in exceptional circumstances, as set out in the London Plan.</p> <p>Paragraph 17.27 has been revised to align with the approach set out in the London Plan. That notwithstanding, applicants will be required to present affordable housing figures as a percentage of the total residential provision proposed by habitable rooms, by units, and by floorspace to enable comparison.</p> <p>Policy LP25 (now LP23) seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. This will ensure that new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The Local Housing Needs Assessment initially recommended an equal split of 50% low-cost rented housing and 50% intermediate housing, which is conforms to the London Plan. Although the study recommends that future policies prioritise London Living Rent over Affordable Rent dwellings at 80% market discount, it is worth noting that the intermediate housing will be assessed in line with the adopted Intermediate Housing Policy, which requires the following: (a) 50 per cent of all intermediate homes to be affordable to those on household incomes of up to £56,200 per annum; (b) 50 per cent of all intermediate homes affordable to those on household incomes of up to £90,000 per annum - in line with the London Plan intermediate household income thresholds; and (c) that in any scheme, an average household income be achieved across all shared ownership in a scheme with this average income being no more than £56,200. This will ensure that intermediate housing is priced so that a significant majority of the units can be purchased by households with low to medium incomes within a range to be determined by the Council, which will be updated annually to reflect changes in incomes and house prices, with upper income thresholds being determined with reference to any revised figures in the London Plan Annual Monitoring Report.</p> <p>This affordable housing tenure split was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The tenure split was viability tested as part of the Whole Plan Viability Assessment.</p> <p>The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.</p> <p>The conversions threshold has been revised down to 130sqm (as originally constructed). The justification behind this approach is set out in the relevant evidence base document.</p> <p>The policy requires that only one family-sized unit should be provided with direct access to a dedicated rear garden of at least 15sqm. This requirement is unlikely to put a strain on future development. It will generally apply to ground floor units which can be provided with direct access to a dedicated rear garden in the vast majority of cases. A 15sqm garden is more likely to deliver a more usable layout than a 5sqm garden.</p> <p>It is agreed that Policy LP30 (now LP28) should clarify that the Mayor's threshold approach applies to purpose-built student accommodation.</p>	<p>Policy LP25 (now LP23) amended to limit the requirement for viability evidence to those circumstances which are specified in the London Plan.</p> <p>Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.</p> <p>Policy LP25 (now LP23) amended to clarify that affordable housing will be measured by habitable rooms.</p> <p>Policy LP28 (now LP26) amended to lower the conversions threshold to 130sqm (as originally constructed).</p> <p>Policy LP30 (now LP28) amended to clarify that the Mayor's threshold approach applies to purpose-built student accommodation</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Infrastructure Funding Study which was carried out in 2010. The borough's most up-to-date Local Plan viability evidence was carried out in 2013. The affordable housing target for the VNEB OA was based on this evidence which predates the PLP, so it is generally welcomed that in paragraph 17.19 the borough commits to updating the Viability Assessment and the Development Infrastructure Study (DIFS) to support its approach towards affordable housing. In developing this evidence special regard should be had to:</p> <ul style="list-style-type: none"> <li>• The extent to which the Northern Line extension and other VNEB OA infrastructure requirements have been funded and completed;</li> <li>• The rise in residential values in the borough and the VNEB OA since 2013; and</li> <li>• The borough's intentions regarding CIL Charging Rates, which are due to be reviewed this year.</li> </ul> <p>Limiting conversions to those dwellings that are larger than 150sqm could be considered to be excessive in light of the fact that the minimum space standard set out in Table 3.1 of the PLP for a six bedroom, eight-person dwelling is 138sqm. Wandsworth should consider revising this figure down. Given Policy D6 of the PLP which sets a minimum standard for private outside space of 5sqm for a 1-2 person dwelling and 1sqm for each additional occupant, the requirement of draft Policy LP 29 part D, which requires that family sized conversions should each be provided with a dedicated garden of at least 15sqm should be reviewed and afforded more flexibility. The Mayor welcomes Wandsworth's support for the provision of student accommodation, recognising how it contributes towards meeting the complex housing needs of London as a whole. Draft Policy LP30 references Policy H15 of the PLP but should make it clear that the Mayor's threshold approach applies to purpose-built student accommodation as set out in part A4 of the policy.</p>		
Kin Development		Ben Ford	Director Quod	1044	Policy LP25	<p><b>Policy LP25 Affordable Housing &amp; Paragraph 17.26 - OBJECT</b></p> <p>Policy LP25 confirms that the Council will follow the Mayor of London Threshold Approach to affordable housing. Kin supports the Fast Track / Threshold approach to affordable housing set out in the London Plan (2020) and the GLA's Affordable Housing and Viability SPG (2017). Kin agree that setting out a consistent, certain, and transparent approach to affordable housing for planning application will accelerate planning decisions and therefore increase the delivery of market and affordable housing.</p> <p>It is noted that Policy LP25 omits reference to Footnote 59 of the 2020 London Plan and this should be rectified by including reference. We proposed that it should to ensure conformity with the London Plan (2020).</p> <p>B(4) 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) <b>and Footnote 59 of the London Plan.</b></p> <p>Footnote 59 of the London Plan (2020) recognises the substantial costs of preparing surplus utilities sites for development. It therefore (inter alia) confirms that surplus utility sites will be subject to the 35% affordable housing fast track.</p> <p>"For the purposes of Policy H5 Threshold approach to applications, this floorspace-based approach applies to sites used for utilities infrastructure or land for transport functions that are no longer required. However, it is recognised that some surplus utilities site are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available."</p> <p>LP25 (Part C) Kin support the Council's proposed tenure split of 50% low-cost rent products and 50% intermediate products set out at LP25(C). Whilst this</p>	<p>Paragraph 17.27 has been revised to align with the approach set out in the London Plan. That notwithstanding, applicants will be required to present affordable housing figures as a percentage of the total residential provision proposed by habitable rooms, by dwelling units, and by floorspace to enable comparison.</p> <p>The Council organised an engagement event on 5 May 2021 attended by surveyors, land owners, RPs, planning agents and property agents to inform the Whole Plan Viability Assessment.</p> <p>The use of Vacant Building Credit remains a constant concern given that it has significant scope to undermine affordable housing provision. Development in Wandsworth has been entirely on brownfield land in recent years; these brownfield sites have, in almost all cases, featured existing buildings. The vast majority of proposed site allocations feature existing buildings on site. Prior to redevelopment, almost all buildings are empty or redundant, so the VBC has the potential to be applied very widely and undermine the affordable target. The London Plan inspectors report recommended deletion of the London-wide Vacant Building Credit policy due to "insufficient evidence of the impact of disapplication of the Vacant Building Credit across London as a whole to justify a departure from national policy." However, the inspectors report recognised the acute need for affordable housing and the potential significant impact of the VBC, and notes that individual boroughs could pursue local dis-application of the VBC. The circumstances evident in the borough, particularly the scarcity of land and the significant need for affordable housing, justify a locally-specific approach.</p> <p>Paragraph 17.26 has been revised to align with the London Plan.</p> <p>The revised policy LP25 (now LP23) makes it clear that affordable housing will be provided in accordance with the threshold approach set out in London Plan Policy H5. Footnote 59 is contained in the London Plan, and thus there is no requirement to reference is specifically in the Local Plan.</p>	<p>Paragraph 17.27 amended to clarify that affordable housing will be measured by habitable rooms.</p> <p>Paragraph 17.26 amended to align the approach set out in the London Plan.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						aligns with the New London Plan Policy H7, (30% low cost rent, 30% intermediate and 40% to be determined by the borough) and is supported by an updated Local Housing Needs Assessment, this tenure provision is yet to be tested in an updated local plan viability assessment to ensure this mix is viable and deliverable, it is recognised that this is subject to change following an up to date viability assessment being undertaken. Kin would welcome inputting into the Local Plan Viability Study in accordance with the NPPF policy for plan making. Kin support the Council's approach to viability assessments at LP25(E) which is in conformity with the London Plan. Viability assessment will not be required for fast-track applications. LP25 (Part G) needs to be amended to align with the New London Plan which has removed this statement in the latest draft and now aligns with national policy supporting the use of Vacant Building Credit in specific circumstances		
Spencer Barnshaw	Secretary Battersea and Wandsworth Trades Union Council			1151	Policy LP25	<p>LP25 – Affordable Housing</p> <p>BWTUC welcomes the commitment to ensuring that 50% of new housing is 'affordable'. The London Plan requires that 30% of that be low cost rent and we would urge that that 30% be at Social Rents, that 30% be 'intermediate products' (ie paths to shared ownership) and that the remaining 40% be at the discretion of the local authority. We would urge that this 40% be at social rents on secure tenancies managed by the council or by a non-profit RSL in order to redress the balance of lost public housing in the borough and to begin to restore social balance in the borough.</p> <p>We note that there are no proposals to tackle the unacceptably high number of formerly council-owned properties that have fallen into the hands of private landlords. BWTUC would welcome proposals for a programme of municipalisation aimed at bringing these tenancies back into the public realm and providing secure social rent and affordable rent tenancies to the existing tenants.</p>	<p>Policy LP25 (now LP23) seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. This will ensure that new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The affordable housing tenure split has been informed by the Local Housing Needs Assessment (2020). The study initially recommended an equal split of 50% low-cost rented housing and 50% intermediate housing. This was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The study includes a justification behind the recommended policy approach.</p> <p>In accordance with policy LP27 (now LP25), where the loss of existing affordable housing is proposed, the Council will assess any planning application against the requirements of Policy H8 of the London Plan.</p>	No change to the Local Plan required as a result of this representation.
Dr Rosena Allin-Khan				1197	Policy LP25	<p>(iii) Affordable Housing: LP25</p> <p>While I welcome the development of "affordable" homes to the local area, I am concerned that those proposed are not genuinely affordable and do not meet the needs of residents within the borough.</p> <p>It is evident from the Local Housing Needs Assessment which forms part of the Plan's evidence base that there is a clear need for housing rented at council tenancy levels. The ongoing shortfall in social housing has resulted in many Tooting residents experiencing issues such as eviction, inadequate temporary accommodation, overcrowding, and generally poor living standards. These issues also exacerbate inequalities within the healthcare system.</p> <p>I would like to see a significant increase in the number of genuinely affordable homes, especially in the wake of the coronavirus pandemic and rising homelessness statistics. Paragraph C of policy LP25 Housing Mix should also be amended to require 70% low-cost rent products and 30% intermediate products. This will necessitate changes to the supporting text.</p>	<p>Policy LP25 (now LP23) seeks to balance the need to provide social housing against the need to provide intermediate housing for those households on low to middle incomes who would neither have priority for social housing or be able to afford market housing. This will ensure that new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The affordable housing tenure split has been informed by the Local Housing Needs Assessment (2020). The study initially recommended an equal split of 50% low-cost rented housing and 50% intermediate housing. This was later revised to a tenure split of 50% low-cost rented housing, 25% First Homes and 25% intermediate housing as a result of recent changes to national policy. The study includes a justification behind the recommended policy approach.</p>	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1335	Policy LP25	<p>We would like to make the following suggestions:</p> <p>Wandsworth council take an active role in the building of social housing.</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1336	Policy LP25	The proportion of new build residences that are genuinely affordable should be 50% within the Vauxhall/ Nine Elms/Battersea Opportunity Area and outside it. (17.18 and LP25)	The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.	Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.
Mr Andrew Simpson	Planning Director South West London and St George's	Anna Russell-Smith	Senior Planner Montagu Evans	1258	Policy LP25	<p><b>See attachment on comment 1256 for full representation</b></p> <p><b>Affordable Housing</b></p>	Comment noted. The allocation of affordable housing to specific households or groups is not a matter for the Local Plan to address. Nevertheless, Essential Local Workers are important economically in providing the social infrastructure which enables business to flourish. The affordable housing split takes into account the needs of Essential Local Workers, which is discussed in more detailed in the Local Housing Needs Assessment.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Mental Health NHS Trust					<p>SWLSTG supports the provision of affordable housing across the Borough and welcomes the provision within draft Policy LP25 (Affordable Housing) to secure affordable housing in line with the Mayor's targets where viable as demonstrated within a Financial Viability Assessment. The provision of 'regarding to the character and context of individual proposals and to viability considerations' within the draft policy is welcomed as this seeks to ensure that the provision of affordable housing is reflective of the schemes' character, context and viability. Within the context of individual proposals, the Council should consider other scheme benefits which are proposed, particularly where development is the primary means of funding new and improved social infrastructure such as healthcare and educational facilities.</p> <p>We would further encourage LBW to recognise within the draft Policy the valuable contribution staff accommodation has on the delivery and operation of healthcare services. The definition of Affordable Housing within the NPPF includes housing for essential local workers and the current Covid-19 pandemic has further highlighted the need and importance of key worker accommodation. Whilst we acknowledge that delivering housing for 'valued key workers' is a key objective of the LBW new Local Plan, the draft Affordable Housing Policy makes no reference to ensure that any such provision is secured for key workers of the NHS.</p>	The Council will continue to offer Wandsworth residents and key workers priority access to all affordable and intermediate housing in the borough to ensure that housing is allocated fairly and prioritised to those on average and below average incomes. Where appropriate, this will include options to meet demand from key workers including for low cost rented housing. This strategy is set out in more detail in the Housing and Homelessness Strategy 2019-2022.	
Mr Ben Wrighton	Strategic Planning Director Watkin Jones Group	Sam Stackhouse	Associate Montagu Evans LLP	1264	Policy LP25	<p><b>See comment 1261 for attachment with full representation</b></p> <p>Proposed Amendments to Policy LP25</p> <p>Our recommended amendments to Policy LP25 are set out below in red.</p> <p>LP 25 Affordable Housing F. The management of the affordable housing homes provided will be undertaken by a Registered Provider which is a Preferred Partner of the Council unless otherwise agreed by the Council or if the development is Build to Rent in which the provisions of Policy LP32 apply. Any relevant scheme will need to demonstrate that the design, siting and phasing of affordable homes provides for its proper integration and timely provision as part of the wider development</p>	Agreed.	Policy LP25 (now LP23) amended to clarify that the management of affordable housing provided as part of Build to Rent schemes does not have to be undertaken by a Registered Provider.
Axis Construction		Joseph Hickling	Planner Boyer Planning Ltd	1218	Policy LP25	<p><b>See comment 1217 for attachment of full representation</b></p> <p><u>Draft Policy LP25 –Affordable Housing</u></p> <p>2.6Part A of this policy states "The Council will seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable, having regard to the character and context of individual development proposals and to viability considerations".</p> <p>2.7This wording fails to comply with the requirements of Planning Practice Guidance, which states that policies must be "clear and unambiguous" [Paragraph: 041 Reference ID: 41-041-20140306]. Therefore, it not presently justified nor is it likely to be effective.</p> <p>2.8In particular, the text fails to define "all new homes". It will therefore be unclear (during the course of the decision-taking process),how this Policy should be applied in respect of proposals for specialist forms of accommodation.</p> <p>2.9The London Plan (Intended to Publish Version) (December 2019)states that the following: "This policy contains requirements for 'specialist older person housing'. It does not apply to accommodation that has the following attributes, which is considered 'care home accommodation':</p> <p>personal care and accommodation are provided together as a package with no clear separation between the two;</p>	Policy LP25 (now LP23) makes it clear that the provision of affordable housing or financial contributions will be sought from any development making provision for new dwellings or the provision of residential accommodation with shared facilities. The London Plan does not restrict Councils from seeking addition contributions. While the Wandsworth's Local Plan policy goes further than the London Plan, we note that the Greater London Authority have not raised any objections to policy LP33 in their representations on the Local Plan.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>·the person using the service cannot choose to receive personal care from another provider;</p> <p>·people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold and;</p> <p>·likely CQC-regulated activity<sup>71</sup> will be 'accommodation for persons who require nursing or personal care'".</p> <p>2.10The supporting text to Draft Policy LP25 should therefore be revised to add the following sentence: "For clarity it is confirmed that Policy LP25 (Affordable Housing) is not applicable for care home accommodation".</p>		
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1307	Policy LP25	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP25 - Affordable Housing</b></p> <p>Overall, we support the Councils approach to affordable housing and are encouraged to see recognition of the challenging viability situation in the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB OA).</p> <p>However, we strongly consider that consistency with the New London Plan is the best approach, as it will ensure a smoother planning process. The Policy requires viability assessments for schemes not meeting 50% affordable housing in non-designated industrial sites. This conflicts with the recent amendments to the New London Plan Publication Version (2020) fast track route which removes the requirement for 50% affordable on non-designated industrial sites should an agreed level of employment floorspace be delivered.</p> <p>The current Local Plan approach would result in certain GLA referable schemes not requiring a viability appraisal for the GLA but requiring an appraisal for Wandsworth Borough. This creates confusion and ultimately can affect delivery.</p> <p>We consider that Wandsworth's policy should be amended to be in line with the proposed New London Plan Publication Version (2020) Policy H6 target and the Housing and Viability SPG (2017) for consistency in policy. It is paramount that strategic and local policy broadly aligns to ensure clarity within the planning process.</p>	<p>The support for the approach to affordable housing is acknowledged; the Local Plan Policy LP25 (now LP23) has been amended to reflect the New London Plan in respect of the threshold approach, which inherently and by implication, requires the removal of the lower threshold for the VNEB OA (15%, against the London Plan expectation for 35%) that was set out in the Reg.18 Plan. The Whole Plan Viability Study has concluded that the 35% threshold is viable in VNEB, and takes account of CIL requirements and the expectations for a high quality place.</p> <p>Policy LP25 (LP23) has been amended to clarify that it is not the Council's intention to viability test all residential planning applications. The revised wording of the policy makes it clear that viability evidence will only be required in exceptional circumstances, as set out in the London Plan or as determined by the Council.</p>	<p>Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.</p> <p>Policy LP25 (now LP23) amended to limit the requirement for viability evidence to those circumstances which are specified in the London Plan.</p>
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1532	Policy LP25	<p>LP25 Affordable Housing</p> <p>It is recognised that the shortage of affordable housing in London is hindering the recruitment and retention of public service workers. The National Planning Policy Framework definition of affordable housing (Annex 2) includes housing for sale or rent for essential local workers, which includes NHS staff. The latest national NHS guidance is 'Homes for NHS Staff' published by NHS Improvement in June 2019.</p> <p>The use of public sector land represents an opportunity to deliver homes that can meet the needs of the borough's essential workers. It is noted that the Council's Housing and Homelessness Strategy 2019-2022 states that the Council will give Wandsworth workers priority access to affordable and intermediate housing and where appropriate this will include options designed to meet demand from key workers including for low cost rented housing. We suggest an additional paragraph is added under paragraph 17.24 to support Clause B 3 of the policy and its interpretation of the London Plan Policy H5 and to address the need for housing for essential workers: "Public sector land represents an opportunity to deliver homes that can meet the needs of the borough's essential workers. Innovative housing products that meet the requirements of this Policy including approaches that set aside a proportion of homes on land owned by public sector organisations for essential workers will be supported. Where there is an agreement between public sector organisations and the Mayor to deliver at least 50% affordable housing across a portfolio of sites, then the 35% threshold could apply to individual sites."</p>	<p>Essential Local Workers are important economically in providing the social infrastructure which enables business to flourish. The affordable housing split takes into account the needs of Essential Local Workers, which is discussed in more detailed in the Local Housing Needs Assessment.</p> <p>The allocation of affordable housing to specific households is not a matter for the Local Plan to address. Nevertheless, the Council will continue to offer Wandsworth residents and key workers priority access to all affordable and intermediate housing in the borough to ensure that housing is allocated fairly and prioritised to those on average and below average incomes. Where appropriate, this will include options to meet demand from key workers including for low cost rented housing. This strategy is set out in more detail in the Housing and Homelessness Strategy 2019-2022.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Cyril Richert	Clapham Junction Action Group			1677	Policy LP25	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>LP25 Affordable Housing page 280</p> <p>The Council will seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable, having regard to the character and context of individual development proposals and to viability considerations. The threshold level of affordable housing based on the gross number of new homes to be provided, having had regard to the most up-to-date viability evidence, 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;.</p> <p>There is without doubt a lack of affordable accommodation available in Wandsworth.</p> <p>In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we commented that “commented that greater affordable accommodation is required on all new developments.” However, planners are just duplicating targets from the London plan while trying to release constraints on social tenure47 .</p> <p>In addition, all comments on “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.” are not addressed in the proposed Local Plan.</p> <p>In a recent application48, developers submitted an assessment showing:</p> <p>13,500 Private Rented Sector (PRS) households in the local area, with the average studio rent in the area ranging from £1,440 - £ 1,650 pcm and for 1 beds £ 1,350 – 1,800 pcm. At the median household income of those households living in the PRS only 44% could afford a 1 bed PRS property.</p> <p>We are aware of the Mayor's strategic target of 50 per cent of all new homes to be affordable. We know also that the NPPF 2018 widens the definition of affordable housing and therefore it is sensible to move the target up to send a signal to developers.</p> <p>However, the policy should reflect more accurately the target of the different type of affordable housing. The NPPF49 says in par. 62:</p> <p>Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required</p> <p>It includes the share of social housing, affordable rent (20% below market rent including service charges), affordable home ownership, shared ownership...etc. The current designation in the Local plan is too vague.</p> <p>LP25 Affordable Housing – C - Must elaborate “affordable housing tenure split of 50% low-cost rent products and 50% intermediate products.”</p> <p>Although the Mayor 50% target can be justified, questions arise whether the target is viable, and therefore achievable, especially in a context where Wandsworth Council has failed to reach much lower targets in the past decade.</p> <p>We note that Nine Elms continue to benefit for a much lower target of just 15%. Given the fact that a fourth of the provision of new housing is meant to come from this area, we don't understand how the Council can have any hope in</p>	<p>The Local Plan aims to set out a positive framework seeking to maximise the provision of affordable housing. Policy LP25 (now LP23) is aligned with the threshold approach set out in the London Plan, and has been revised for sites within the VNEB OA to reflect the approach in the London Plan.</p> <p>Paragraph 63 of the NPPF states that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).</p> <p>The affordable housing tenure split has been informed by the Local Housing Needs Assessment. The study includes a justification behind the recommended policy approach. This summarised in a greater detail in the supporting text of the policy. The approach to affordable housing is in general conformity with the NPPF and London Plan.</p> <p>The application of policies is a Development Management issue rather than a matter for the Local Plan to address.</p>	<p>Policy LP25 (now LP23) amended to remove the lower threshold / exception for VNEB sites. All sites to provide affordable housing in accordance with the threshold approach of the London Plan.</p> <p>No further change to the Local Plan required as a result of this representation.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>achieving the Mayor's strategic target of 50% of all new homes to be affordable. To make matters even worse, the threshold level of affordable accommodation is only meant to reach 50% on public sector land and Industrial Sites.</p> <p>LP25 Affordable Housing – We suggest moving the target for NEVB to 35% and 50% for the rest of the borough.</p> <p>All figures in the latest Authority Monitoring Report (AMR)50 show that not only Wandsworth borough is below achieving the current adopted Local Plan target of 33% on sites (Wandsworth Council has only produced 10% affordable housing during 2017/2018), but in the affordable component, they can't even get close to the 60% social/affordable rent / 40% intermediate tenure split.</p>		
DTZ Investors		Neil Wells	Quod	1507	Policy LP25	<p>Chapter 17 Providing Housing Policy</p> <p>LP25 Affordable Housing – OBJECT</p> <p>DTZi support the Council's aspiration to update the Local Plan to align with the New London Plan including the threshold approach to affordable housing. Draft Policy LP25 Affordable Housing sets out this intention, however it is not clear why the measure of affordable housing is still being maintained by units not habitable rooms. This is inconsistent with the London Plan. Developers looking to bring sites forward will have to meet both units and habitable rooms to align with GLA and LBW thresholds which seems unnecessarily complicated recognising that this likely to be some variation between both measures. The metric of units for the calculation of affordable housing should be deleted.</p> <p>LP25 (Part C) DTZi broadly support the Council's proposed tenure split 50% low-cost rent products and 50% intermediate products set out at LP25(C). Whilst this aligns with the New London Plan Policy H7, (30% low cost rent, 30% intermediate and 40% to be determined by the borough) and is supported by an updated Local Housing Needs Assessment, this tenure provision is yet to be tested in an updated local plan viability assessment to ensure this mix is viable and deliverable, it is recognised that this is subject to change following an up to date viability assessment being undertaken. DTZi would welcome inputting into the Local Plan Viability Study in accordance with the NPPF policy for plan making.</p> <p>LP25 (Part G) needs to be amended to align with the New London Plan which has removed this statement in the latest draft and now aligns with national policy supporting the use of Vacant Building Credit in specific circumstances.</p> <p>DTZi proposes the removal of text at paragraph 17.26 as it is ambiguous and unsound. Paragraph 4.5.14 of the London Plan requires late-stage review mechanism only with viability tested applications.</p> <p>17.26 Where applications are not considered to be maximising the level of affordable housing or where it is proposing a tenure mix which is not policy compliant, the Council will consider the appropriateness of requiring review mechanisms at appropriate stages / milestone(s) of the construction period</p>	<p>Paragraph 17.27 has been revised to align with the approach set out in the London Plan. That notwithstanding, applicants will be required to present affordable housing figures as a percentage of the total residential provision proposed by habitable rooms, by units, and by floorspace to enable comparison.</p> <p>The Council organised an engagement event on 5 May 2021 attended by surveyors, land owners, RPs, planning agents and property agents to inform the Whole Plan Viability Assessment.</p> <p>The use of Vacant Building Credit remains a constant concern given that it has significant scope to undermine affordable housing provision. Development in Wandsworth has been entirely on brownfield land in recent years; these brownfield sites have, in almost all cases, featured existing buildings. The vast majority of proposed site allocations feature existing buildings on site. Prior to redevelopment, almost all buildings are empty or redundant, so the VBC has the potential to be applied very widely and undermine the affordable target. The London Plan inspectors report recommended deletion of the London-wide Vacant Building Credit policy due to "insufficient evidence of the impact of disapplication of the Vacant Building Credit across London as a whole to justify a departure from national policy." However, the inspectors report recognised the acute need for affordable housing and the potential significant impact of the VBC, and notes that individual boroughs could pursue local dis-application of the VBC. The circumstances evident in the borough, particularly the scarcity of land and the significant need for affordable housing, justify a locally-specific approach.</p> <p>Paragraph 17.26 has been revised to align with the London Plan.</p>	<p>Paragraph 17.27 amended to clarify that affordable housing will be measured by habitable rooms.</p> <p>Paragraph 17.26 amended to align the approach set out in the London Plan.</p>
Mr Robert Arguile	Chair The Putney Society			397	Policy LP26	<p>LP26.A.1 A requirement for just 25% as family sized dwellings goes against the population figures in Chapter 2 which show that families are being squeezed out.</p> <p>LP26.C Supported. We are concerned that too many permissions in recent years have ignored this.</p> <p>LP26.E.3 Viability should not be an excuse for more and smaller instead of family units. Planning must take the long term view.</p> <p>Policy LP27</p>	<p>The housing mix was informed by the LHNA 2020, which provides the latest published housing needs evidence in relation to the likely quantum, type, size and tenure of new homes needed across the borough over the plan period.</p> <p>Policy LP26 (now LP24) does not indicate minimum or maximum limits for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites (including viability). This is reflected in the wording of the policy.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee			814	Policy LP26	<b>LP 26 Housing Mix</b>	The housing mix was informed by the LHNA 2020, which provides the latest published housing needs evidence in relation to the likely quantum, type, size and tenure of new homes needed across the borough over the plan period.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society					<p>As we note above, current levels of inward and outward migration, especially by young adults, are incompatible with the Council's aim to establish stable local neighbourhoods and balanced, cohesive communities. In that context, the policies in the Plan to focus new housing provision, both for the market and (even more so) for the affordable housing sectors, on one-bedroom and two-bedroom units is perverse.</p> <p>Wandsworth has a higher proportion of one-bedroom units, and a lower proportion of three-to-four-bedroom units, than the London average; and the dearth of family-sized housing, available at prices that young adults can afford, is a key driver of outward migration and militates against the creation of stable and cohesive communities. The provision of new family-sized housing should be a priority for the Council; but it has not in recent years met even the limited proportions of three-four-bedroom-units set in previous Plans. The new Plan's reliance on limited measures to guard against the sub-division of existing family-sized houses, concentrated among the Victorian and Edwardian terraces typical of many parts of south Battersea, is simply wrong. It will exacerbate existing imbalances and inequities between different parts of Battersea, with similar effects in the rest of the borough.</p>	Although conversions play an important role in increasing the number and variety of dwellings in the borough; it is important that the creation of additional dwellings is not achieved at the expense of family-sized accommodation.	
Cllr. Paul White				668	Policy LP26	Community ownership can reduce cost, engage residents and representative groups and encourage protection of facilities, leading to longevity and enhancement. Such initiatives in "greening" facilities should be encouraged and be a legacy of developments.	Comment noted.	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1046	Policy LP26	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Policy LP26 Housing Mix – OBJECT</b></p> <p>Kin are concerned that the inflexibility applied at Policy LP26(C) conflicts with the rest of the policy</p> <p>and should be removed. It conflicts with London Plan Policy H10; paragraph 4.10.3 and 4.10.4.</p> <p>1. <u>Development proposals creating 10 or more units (gross), will be supported where 1 person/studio accommodation does not exceed 5% of all market units. 1 person/studio accommodation will only be supported within the market element of the housing to be provided.</u></p> <p>Part D should be clearer in setting out if the Ownership Housing term refers to all intermediate homes including London Living Rent or Discount Market Rent or if there are different housing mix requirements for these tenures.</p>	<p>New homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. Preference will therefore be given to larger homes, because proposals which provide more than a small proportion of studios are unlikely to achieve this objective. Nevertheless, the policy allows for a proportion of studios to be provided. The policy does not conflict with paragraphs 4.10.3 and 4.10.4, which refer to one- and two- bedroom units rather than studios. Paragraph 4.10.4 of the London Plan makes it clear that one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.</p> <p>It is agreed that policy LP26 (now LP24) should provide more clarity with regards to the distinction between affordable rented and affordable ownership homes.</p>	Policy LP26 amended to clarify that the indicative targets relate to low-cost rent and intermediate housing.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1213	Policy LP26	<p><i>Policy LP26 Housing Mix</i></p> <p><i>We are supportive of mixed and balanced communities, however, as set out in Part E, it is important that housing mix is determined on a site by site basis, taking into account site context, housing need and market demand and viability when determining the appropriate mix. Consideration should also be given to the proposed mix of uses, range of tenures included and strategic aims to optimise housing potential on all sites in accordance with Policy H10 of the Publication London Plan. In particular, this policy should acknowledge the need for an alternative mix in Build-to-Rent schemes (which are better suited to smaller unit sizes as set out in Para 4.31 of the GLA's SPG). It should also acknowledge the need to ensure larger 3 and 4 bed affordable homes ownership products can be made genuinely affordable to intermediate households. In view of the above, this policy may be more effective if prescriptive target mixes for Market and Affordable Home Ownership are removed in accordance with the approach set out in the Publication London Plan.</i></p>	<p>Although, it is acknowledged that the SPG recommends that local policies requiring a range of unit sizes should be applied flexibly to Build to Rent schemes to reflect demand for new rental stock, new homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. Development proposals will therefore be required to provide a proportion of larger dwellings, because developments which only provide smaller units are unlikely to achieve this objective. Build to Rent and Build for Sale are both types of self-contained housing, and thus there is no justification to include alternative housing mix targets specifically for Build to Rent Schemes. Nevertheless, policy LP26 (now LP24) does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites. This stance is reflected in the wording of the policy.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Axis Construction		Joseph Hickling	Planner Boyer Planning Ltd	1219	Policy LP26	<p><b>See comment 1217 for attachment of full representation</b></p> <p><u>Draft Policy LP26 -Housing Mix</u></p> <p>2.11 Although generally supported in-principle, the text proposed in part A of this draft policy should specify that 'specialist housing' should not need to accord with the indicative tenure proportions. Due to the different and often be spoke nature of specialist housing, greater flexibility should be applied. This should include instances when development proposals do not fall within Use Class C3.</p> <p>2.12 The application of part C of this proposed policy is also potentially not appropriate for specialist housing. Again, greater flexibility is required for specialist housing.</p> <p>2.13 It is therefore recommended that part A is amended as follows: "Proposals for residential development (Use Class C3) will be supported where the market housing dwelling mix:"</p> <p>2.14 It is recommended that the supporting text to this policy further clarifies that proposals for specialist accommodation, for older and vulnerable people, should be evaluated on a case-by-case basis, with the proposed mixture of units being evaluated in a 'needs assessment', to be submitted in support of relevant planning applications.</p> <p>2.15 If the draft policy were to be revised in this way, it would be rendered more responsive and flexible. It would therefore operate more effectively as a mechanism to facilitate the delivery of specialist forms of accommodation.</p>	Agreed. Policy LP26 (now LP24) applies to Use Class C3 and C4 housing only.	Supporting text of policy LP26 (now LP24) amended to clarify that the dwelling mix requirements set out in this policy do not apply to developments that provide housing for specific community needs
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1308	Policy LP26	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP26 - Housing Mix</b></p> <p>We support the Councils approach to identifying the preferred housing mix within the Borough. We are pleased to see that when officers assess the dwelling mix it will be on a site-by-site basis and in applying the preferred housing mix, regard will be given to the viability of the development.</p> <p>The alignment with Policy H10 of the New London Plan Publication Version (2020) is strongly welcomed in giving certainty to developers.</p>	Support noted.	No change to the Local Plan required as a result of this representation.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1549	Policy LP26	<p><b>See attachment in representation 1534 for context</b></p> <p>Policy LP26 Housing Mix – OBJECT</p> <p>L&amp;G are concerned that the inflexibility applied at Policy LP26(C) conflicts with the rest of the policy and should be removed. It conflicts with London Plan Policy H10; paragraph 4.10.3 and 4.10.4.</p> <p>1. <del>Development proposals creating 10 or more units (gross), will be supported where 1 person/studio accommodation does not exceed 5% of all market units. 1 person/studio accommodation will only be supported within the market element of the housing to be provided.</del></p> <p>Recognising the number of different affordable housing products, Part D should be clearer in setting out if the Ownership Housing term refers to all intermediate homes including London Living Rent or Discount Market Rent or if there are different housing mix requirements for these tenures. L&amp;G support site specific circumstances including viability to provide housing with a variation to this mix.</p>	<p>New homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. Preference will therefore be given to larger homes, because proposals which provide more than a small proportion of studios are unlikely to achieve this objective. Nevertheless, the policy allows for a proportion of studios to be provided. The policy does not conflict with paragraphs 4.10.3 and 4.10.4, which refer to one- and two- bedroom units rather than studios. Paragraph 4.10.4 of the London Plan makes it clear that one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.</p> <p>It is agreed that policy LP26 (now LP24) should provide more clarity with regards to the distinction between affordable rented and affordable ownership homes.</p>	Policy LP26 (now LP24) amended to clarify that the indicative targets relate to low-cost rent and intermediate housing.
DTZ Investors		Neil Wells	Quod	1508	Policy LP26	Policy LP26 Housing Mix – OBJECT	New homes should contribute to supporting the creation of stable local neighbourhoods and cohesive communities. Preference will therefore be given to larger homes, because proposals which provide more than a small proportion of studios are unlikely to achieve this objective. Nevertheless, the policy allows for	Policy LP26 (now LP24) amended to clarify that the indicative targets relate to low-cost rent and intermediate housing.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>DTZi are concerned that the inflexibility applied at Policy LP26(C) conflicts with the rest of the policy and should be removed. It conflicts with London Plan Policy H10; paragraph 4.10.3 and 4.10.4.</p> <p>1. <del>Development proposals creating 10 or more units (gross), will be supported where 1 person/studio accommodation does not exceed 5% of all market units. 1 person/studio accommodation will only be supported within the market element of the housing to be provided.</del></p> <p>Recognising the number of different affordable housing products, Part D should be clearer in setting out if the Ownership Housing term refers to all intermediate homes including London Living Rent or Discount Market Rent or if there are different housing mix requirements for these tenures. DTZi support site specific circumstances including viability to provide housing with a variation to this mix.</p>	<p>a proportion of studios to be provided. The policy does not conflict with paragraphs 4.10.3 and 4.10.4, which refer to one- and two- bedroom units rather than studios. Paragraph 4.10.4 of the London Plan makes it clear that one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.</p> <p>It is agreed that policy LP26 (now LP24) should provide more clarity with regards to the distinction between affordable rented and affordable ownership homes.</p>	
Lockguard Ltd		Mr David Shiels	Associate DP9	1647	Policy LP26	<p><b>Draft Policy LP26 - Housing Mix</b></p> <p>Draft Policy LP26 requires development proposals creating 10 or more units to have regard to the borough-level indicative proportions for housing mix. The Draft Policy acknowledges that housing mix will be considered on a site by site basis, and in applying the preferred mix, the Council will have regard to a number of factors, including current evidence in relation to housing need, the surrounding context and character, the overall level of affordable housing proposed, and the financial viability of the scheme.</p> <p>Whilst the principles of Draft Policy LP26 are broadly supported by our client, it is considered that the policy wording is further expanded to take account of additional considerations which may restrict or limit the potential to deliver a housing mix which fully accords with the housing mix requirements set out in Draft Policy LP26. It is our view that the Draft Policy should also consider the scale and nature of any proposed development, and the spatial constraints of the application site, both of which can significantly impact the ability to provide a wider range of residential unit types and sizes.</p>	<p>It is considered that the considerations listed in Part E of the policy are sufficient to ensure that the policy is applied flexibly. The addition of additional consideration could undermine the intent of the policy.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Mr Robert Arguile	Chair The Putney Society			398	Policy LP27	<p>Clarity that this refers to total numbers rather than the individual units might be useful.</p> <p>LP27.A Does this apply to the upper parts above shops, often in this size range?</p> <p>LP27.C How is change to holiday lets enforced when there is no construction work?</p>	<p>Part A.2 of the policy applies to residential properties located above non-residential uses (including retail units).</p> <p>Proposals for the change of use of residential accommodation to short-term holiday lets only require planning permission if certain conditions are met. The conversions will therefore only be enforced when planning permission is required.</p>	<p>No change to the Local Plan required as a result of this representation.</p>
Charles Rose	City Planning			445	Policy LP28	<p>c.Summary</p> <p>The proposed house conversion policy (LP28) does not reflect the greater emphasis Policies H1 and H2 of the LPD2020 place on the requirement for small sites to deliver a dditional housing. LB Wandsworth have simply repeated the existing policy, which is negative in wording. Moreover, it has several flaws because it places unduly restrictive requirements to provide large flats, many of which will have to be located across floors and without provision of amenity space. Such units would not be suitable for family accommodation the policy seeks to protect. As set out in this letter, there are clearly more appropriate policies in the LBWPPDLP that can ensure the delivery of family sized units. The policy also restricts the number of one and two person flats, which are often most suited for flat conversions due to size constraints on the upper floors of houses. Restricting such units also reduces the number of units coming forward from small sites and also impacts affordability. Again, there are other more appropriate policies in the LBWPPDLP that can control/promote residential mix.</p> <p>d.Suggested Policy Revision</p> <p>City Planning proposes the following revision to Policy</p>	<p>Please refer to the Council's response to comment 440.</p>	<p>No change to the Local Plan required as a result of this representation.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>LP28:</p> <p>A. The conversion of dwellings with less than 150sqm or less will only be permitted where it can be clearly demonstrated that the property is unsuitable for families(3+ units with ground floor access to the garden).</p> <p>B. Conversions of dwellings of 150sqm or more of existing habitable floorspace (prior to any extensions carried out since the end of 2008 will be permitted where the following criteria are satisfied;1.A three bed + family unit should be provided on the ground floor with access to the garden where possible. Only in circumstances where a three bed+ unit cannot be provided, which must be clearly demonstrated by the applicant will a two bed (four person) unit be considered acceptable;and2.A range and mix of good quality units should be provided on upper floors that are appropriate to existing houses layout and meet other housing standard policies in the Local Plan.</p>		
Charles Rose	City Planning			440	Policy LP28	<p>This correspondence provides representations in connection with LB Wandsworth Pre-Publication Draft Local Plan (LBWPPDLP). Accordingly we enclose the requested Response Form. For ease of reference, the main body of our representation is contained in this letter. City Planning act for a number of SME developers who undertake residential developments in LB Wandsworth. We appraise many sites in the borough for residential development and submit a relatively large number of planning applications each year. As a result, we have an acute understanding of the practical implications of LB Wandsworth's planning policy, particularly with regard to residential conversions. From examination of the emerging policy LP28that relates to residential conversions there is very little change if any from the adopted residential conversion policy (Policy DMH2).This is despite the publication of the London Plan December 2020 (LPD2020), which not only increases the amount of housing local authorities have to deliver but places a greater emphasis on the delivery of housing through small sites. Both Policy H1 and H2 of the LPD2020 expressly recognise the need to optimise the potential for housing delivery on small sites and the importance they will play in meeting London's housing targets. Indeed, paragraph 4.2.4 of the LPD2020 specifically cites residential conversions as a form of development that can achieve these targets. In order to emphasise the importance of small sites on the delivery of new housing across the borough, LB Wandsworth have been set a ten year housing target of 4,140unitson small sites, which represents over 20% of LB Wandsworth's total housing numbers. LB Wandsworth readily acknowledge themselves how important small sites will be when meeting and exceeding their housing targets. Paragraph17.12 of the LBWPPDLP states: 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 improvements, renewal and regeneration."Despite the policy support for optimising delivery on small sites in the LPD2020 and LB Wandsworth themselves recognising this importance, their conversion policy remains in situ and makes no attempt to optimise delivery of more housing. As such it runs contrary to the LPD2020.It remains restrictive in its wording as conversions will only be permitted where certain criteria are satisfied. The policy in short continues to be negatively worded and is therefore wholly contrary to the LPD2020.If it remains in place it could compromise LB Wandsworth's ability to meet and exceed its small sites target. In order to assist the Local Plan process and ensure that house conversions optimise delivery, this letter objects on two grounds. These are:</p> <p>2.The over provision of 3-bed units;and ·Restricting one-bedandstudio units. In doing so,this letter puts forward practical improvements to Policy LP28 that will yield additional units and protect the key policy objectives of seeking to retain accommodation suitable for families. In the first instance it is should be noted that house conversions by their very nature are different to providing new build housing. There are constrained by the confines of the building and what extensions, if any,can be added to the building. The policy needs to reflect this and instil flexibility particularly when one has regard to mix of units these developments provide. Particular house types lend themselves to a specific number of units.Having a prescriptive policy can lead to developments being contrived, under-utilised or simply unviable, particularly if house builders are being forced to provide large units across upper floors with no available amenity space. These types of units are particularly unattractive in the current market.a.Over Provision of 3+ unitsFor the purposes of the 150sqm threshold, family accommodation</p>	<p>An approach to conversions (or indeed any policy) which was based on what the market wants would fundamentally undermine the planning system. It seeks to ensure that the creation of additional dwellings is not achieved at the expense of much needed family-sized accommodation.</p> <p>The conversions threshold has been revised down to 130sqm (as originally constructed). The justification behind this approach is set out in the relevant evidence base document (Residential Development on Small Sites - Policy Paper).</p> <p>The policy has been revised to require the provision of at least one family-sized dwelling, regardless of the total number of units provided.</p> <p>Family-sized housing is defined in the Glossary of the Plan.</p>	<p>Policy LP28 (now LP26) amended to lower the conversions threshold to 130sqm (as originally constructed).</p> <p>Policy LP28 (now LP26) amended to limit the provision of family-sized units to one unit.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>should be expressly defined in order to avoid confusion. It is normally considered to be 3+bedroom with access to the garden via the ground floor. Family accommodation should not be classed as being appropriate across upper floors with no access to amenity space.This is not normally appropriate for families.This type of accommodation can be converted into smaller flats that have a lesser requirement for outdoor amenity space.The explanatory text should clearly define family accommodation as prescribed above.City Planning does no object to retaining a family 3+ bed unit on the ground floor with access to the garden where this is readily practicable. However, it is not always possible. A degree of flexibility should be inserted into the policy in circumstances where a three bed unit is simply not possible to provide in the knowledge that a flat with two large double bedrooms can provide perfectly acceptable accommodation for small families (one/two adults and a child). The onus should be on the applicant to demonstrate that a three bed unit cannot satisfactory be provided and then and only then should a 2-bed 4person flat be considered. This onus upon the applicant can be inserted into policy .City Planning does object to the requirement to provide more than one 3+ bed unit. In a four bed conversion this would represent 50% of units being three bedrooms or more which is excessive. It often results in one unit being arranged over multiple floors with no access to garden space. Therefore they are often not suitable for family use, which conflicts with the policy objective to provide family accommodation.This requirement also significantly reduces the number of units that conversions can yield and therefore fails to optimise these small sites thereby running contrary to LPD2020.Against this background, there are other policies in the LBWPPDLP that promote the provision of three bed units to ensure a supply of larger units comes forward. Policy LP27 allows the de-conversion of smaller units to create larger family units. This is a useful way of refining the existing housing stock and hassome planning benefit bu tit is at the expense of losing units. Retaining Policy LP27 but removing the requirement to provide more than one three bed unit in a residential conversion strikes the right balance between refining the existing housing stock, retaining accommodation that is suitable for families and most importantly increasing housing numbers.Retaining both policies in their current format would result in units being lost and reducing the number of units coming forward through house conversions. The combination of both policies would run contrary to LPD2020.In addition to the above, Policy LP26 specifically deals with housing mix on developments of 10 or more units. This expressly requires these types of developments to provide a certain mixof units. It is much easier to meet housing mix requirements in large and new build developments than residential conversions that are constrained by the exiting envelope of the house.This is a much more appropriate policy to ensure that the borough is providing an appropriate mix of units</p>		
Mr Robert Arguile	Chair The Putney Society			399	Policy LP28	Supported. Family sized homes should be prioritised.	Comment noted.	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			815	Policy LP28	<p><b>LP 28 Conversions and Protecting Existing Stock</b></p> <p>For reasons outlined above, we support the limited measures to prevent conversions of existing houses of less than 150sqm (rather than the 120sqm threshold used previously); and to require family-sized units in conversions of houses more than 150sqm. We also support the ban on change of use for residential accommodation to short-term lets.</p>	Support noted. However, please note that the conversions threshold has been revised down to 130sqm (as originally constructed). The justification behind this approach is set out in the relevant evidence base document (Residential Development on Small Sites - Policy Paper).	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			400	Policy LP29	<p>LP29.A.1-4 Supported, and all in line with the London Plan.</p> <p>LP29.A.5 Fire safety is a matter for Building Control, not planning policy</p> <p>LP29.B.1, 2 &amp; 3. There have been too many flats consented by you in recent years that contravene these, particularly along the Upper Richmond Road in East Putney. <u>Make this policy stick!</u></p> <p>LP29.D Balconies which should be provided wherever possible in the</p>	<p>Although, the matter of fire safety compliance is covered by Part B of the Building Regulations, it is also covered in the London Plan. It stipulates that the fire safety of developments should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety.</p> <p>Private amenity space will need to comply with the requirements set out in the London Pan. It states that private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						absence of a garden. There is no real privacy to protect in urban gardens which are almost always overlooked by windows.		
Mr David Patterson	Agent Tooting Liberal Democrats			698	Policy LP29	The replacement of front gardens with paving should be denied.	Permitted Development rights allow householders to pave their front garden with hardstanding without planning permission in most cases. Proposals for paving to front gardens will be required to conform to the London Plan when planning permission is required.	No change to the Local Plan required as a result of this representation.
Cllr. Paul White				662	Policy LP29	Quality landscaping and bio-diversity can have positive effects on ASB, mental health and young people's development and should therefore be seen as an important part of any development.  Personal amenity space for every home should be sufficient and meet GLA standards. Developments should avoid "over-massing" and current vegetation and species retained, unless unavoidable in regard to a high social value build.	Policy LP1 requires development proposals to integrate existing, and incorporate new, natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience. Proposals should be designed and constructed to achieve high sustainability standards, including by seeking to maximise opportunities for urban greening, having regard to Policy LP59 (now LP57).	No change to the Local Plan required as a result of this representation.
Kin Development		Ben Ford	Director Quod	1047	Policy LP29	Background and Wandle Delta SPD comments are included in the attachment in comment 1025  <u>Underlined is text which should be removed. In bold is new suggested text</u>  <b>Policy LP29 Housing Standards - OBJECT</b>  We are concerned that the requirements of Policy LP29 exceed the requirement of the London Plan and its Housing Guidance. The policy includes requirements which may limit development unnecessarily. For example, a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise. London Plan Policy D6(C) states that "housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings".  1. All new residential development <b>should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings</b> will be expected to provide dual-aspect accommodation, unless exceptional circumstances can be clearly demonstrated. Where such circumstances are demonstrated, <u>all</u> single aspect units <b>must should</b> :  1. provide a good level of daylight for each habitable room, and optimise opportunity for direct sunlight; 2. ensure that the aspect is not <u>predominantly</u> north-facing; 3. does not face <u>onto main roads or other</u> significant sources of air pollution and/or noise and vibration, and odours which would preclude opening windows;  4. provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and  5. ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking.	Dual aspect is an important requirement to ensure appropriate residential amenity. Where examples of single aspect residential developments exist, the residential amenity they provide is of poorer quality than dual aspect units. There is sufficient flexibility within the policy and supporting text to allow for other material considerations to be taken into account. It is however agreed that a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise.	Policy LP29 (now LP27) amended by removing a reference to 'main roads'.
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1309	Policy LP29	<b>See attachment on comment 1294 for full representation and context</b>  <b>LP29 - Housing Standards</b>  We are supportive of the approach from the Council that seeks to align with the New London Plan Publication Version (2020). As discussed above certainty within the policy framework assists with decision making for developers, reducing risk and ultimately the deliverability of new homes.  However, we have concerns regarding the prescriptive nature of the requirements of single aspect units, notably point 3 which states units must not	Dual aspect is an important requirement to ensure appropriate residential amenity. Where examples of single aspect residential developments exist, the residential amenity they provide is of poorer quality than dual aspect units. There is sufficient flexibility within the policy and supporting text to allow for other material considerations to be taken into account. It is however agreed that a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise.	Policy LP29 (now LP27) amended by removing a reference to 'main roads'.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>"face onto main roads or other significant sources of air pollution and/or noise and vibration, and odours which would preclude opening windows."</p> <p>While we can appreciate the general presumption against single aspect dwellings with fixed windows consideration must be given to certain site-specific constraints. This is especially relevant where the development is proposed adjacent to key infrastructure such as Safeguarded Waste or Wharf uses (such as the Kirtling Street Site Allocations). In order to ensure residential accommodation can be delivered while adhering to the Agent of Change principles flexibility must be given to dwellings that face, or are affected by noise.</p> <p>We therefore request that the policy is amended to reflect the following:</p> <p><i>"Should Take reasonable endeavours to avoid facing onto main roads or other significant sources of air pollution and/or noise and vibration, and odours which would preclude opening windows"</i>.</p>		
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1550	Policy LP29	<p><b>See attachment in representation 1534 for context</b></p> <p>Policy LP29 Housing Standards - OBJECT</p> <p>We are concerned that the requirements of Policy LP29 exceed the requirement of the London Plan and its Housing Guidance. The policy includes requirements which may limit development unnecessarily. For example, a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise. London Plan Policy D6(C) states that "housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings".</p> <p>B. All new residential development will be expected to provide dual-aspect accommodation, unless exceptional circumstances can be clearly demonstrated. Where such circumstances are demonstrated, all single aspect units <u>must should</u> :</p> <ol style="list-style-type: none"> <li>1. provide a good level of daylight for each habitable room, and optimise opportunity for direct sunlight;</li> <li>2. ensure that the aspect is not predominantly north-facing;</li> <li>3. does not face onto main roads or other significant sources of air pollution and/or noise and vibration, and odours which would preclude opening windows;</li> <li>4. provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and</li> </ol> <p>ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking.</p>	Dual aspect is an important requirement to ensure appropriate residential amenity. Where examples of single aspect residential developments exist, the residential amenity they provide is of poorer quality than dual aspect units. There is sufficient flexibility within the policy and supporting text to allow for other material considerations to be taken into account. It is however agreed that a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise.	Policy LP29 (now LP27) amended by removing a reference to 'main roads'.
DTZ Investors		Neil Wells	Quod	1509	Policy LP29	<p>Policy LP29 Housing Standards – OBJECT</p> <p>We are concerned that the requirements of Policy LP29 exceed the requirement of the London Plan and its Housing Guidance. The policy includes requirements which may limit development unnecessarily. For example, a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise. London Plan Policy D6(C) states that "housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings".</p> <p>B. All new residential development will be expected to provide dual-aspect accommodation, unless exceptional circumstances can be clearly demonstrated. Where such circumstances are demonstrated, all single aspect units must should :</p> <ol style="list-style-type: none"> <li>1. provide a good level of daylight for each habitable room, and optimise opportunity for direct sunlight;</li> <li>2. ensure that the aspect is not predominantly north-facing;</li> </ol>	Dual aspect is an important requirement to ensure appropriate residential amenity. Where examples of single aspect residential developments exist, the residential amenity they provide is of poorer quality than dual aspect units. There is sufficient flexibility within the policy and supporting text to allow for other material considerations to be taken into account. It is however agreed that a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise.	Policy LP29 (now LP27) amended by removing a reference to 'main roads'.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>3. does not face onto main roads or other significant sources of air pollution and/or noise and vibration, and odours which would preclude opening windows;</p> <p>4. provide a good level of natural ventilation throughout the dwelling via passive/non-mechanical design measures; and ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking</p>		
Mr Robert Arguile	Chair The Putney Society			401	Policy LP30	LP30.A.2. Student housing in Roehampton cannot meet these provisions without better transport.	As per policy LP30 (now LP28), student housing will only be supported where the development has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population.	No change to the Local Plan required as a result of this representation.
Mr Ben Wrighton	Strategic Planning Director Watkin Jones Group	Sam Stackhouse	Associate Montagu Evans LLP	1261	Policy LP30	<p><b>Please see attachment for full representation.</b></p> <p>Our Client's general observation in relation to Draft Policy LP30 is that it does not provide a clear strategy to meet the demand for student accommodation identified in Publication London Plan (2020) and the Wandsworth Local Housing Needs Assessment (2020). Indeed, Paragraph 4.15.2 of the Publication London Plan states that there is a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period. Furthermore, the Local Housing Needs Assessment identifies a need for circa 788 student bed spaces between 2018-2019 and 2024-25 to meet the planned growth associated with the University of Roehampton and a further need for 41 bed spaces to meet the planned growth associated with St George's – University of London over the same period.</p> <p>In relation to meeting the University of Roehampton's student housing needs, Paragraph 11.102 of the Local Housing Needs Assessment references that the additional capacity could come from the newly permitted Urbanest development at Palmerstone Court (Ref: 2020/2837). However, we would note from the GLA Stage 2 Report dated 25 January 2021 (Appendix 1) that Urbanest is in discussions with the London School of Economics (LSE) pursuant to a potential nominations agreement, which, incidentally, would contribute to meeting the wider London need for student accommodation. Whilst it is acknowledged that there is no guarantee that this nominations agreement will come to fruition, these discussions suggest that limited reliance can be attributed towards the Urbanest scheme meeting the identified needs of the University of Roehampton as alluded to in the Local Housing Needs Assessment. Paragraph 11.103 of the Local Housing Needs Assessment also states that the University is considering building two new halls of residence with a capacity to house 800 students on University owned land but that these are currently at an early stage of design and there is no evidence of an imminent planning application forthcoming. In relation to the student housing needs associated with the St George's - University of London, the Local Housing Needs Assessment states (Paragraph 11.110) that the University's "strategy for how to house these additional students was unclear...".</p> <p>On the basis of the above, we consider that there is not a robust or effective strategy in place which can be relied on to meet the identified student housing needs of the universities in the Borough. Furthermore, there is also no attempt to meet the student housing needs of London which Wandsworth, as a London Borough, is required to plan for in accordance with the Publication London Plan (2020). As an Inner London Borough with good public transport accessibility and short journey times to a number of London's Higher Education Institutions, it would be reasonable to expect that the Borough would make a significant and sustainable contribution to meet the annual London requirement of 3,500 PBSA bed spaces per year. As a general comment therefore, we recommend that Draft Policy LP30 is amended to ensure the Plan has been positively prepared and is effective. The Policy must specifically recognise and positively address the need for student accommodation identified by the London Plan and the Local Housing Needs Assessment and we also recommend that the Draft Local Plan considers the allocation of specific sites to meet the unmet student housing need.</p>	<p>It is agreed that the Local Plan should seek to ensure that local and strategic need for purpose-built student accommodation is met. The policy has been revised to refer to meeting the need of both higher education providers in Wandsworth and of institutions within a reasonable travelling distance of Wandsworth.</p> <p>An over-concentration of student accommodation might be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure. When considering the concentrations of student accommodation, the council will have regard to the character of the area, the existing mix of uses, and the particular impact on any permanent residential occupiers. A quantitative approach to defining over-concentration is not considered appropriate given that schemes need to be considered on a site-by-site basis having regard to nature of development and character of the area. There is no scope to define what constitutes an over-concentration of student accommodation, because it will differ across the borough.</p> <p>It is agreed that there is scope to provide a clearer wording than 'good-sized rooms'.</p>	<p>Policy LP30 (now LP28) and the associated supporting text amended to clarify that proposals for new student accommodation must be supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth.</p> <p>Policy LP30 (now LP28) amended by replacing the requirement to provide 'good-sized rooms' with 'appropriate space standards and facilities'.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>With regards to a more forensic analysis of the wording of Policy LP30, we would also make the following recommendations:</p> <p><u>3) would not result in an over-concentration of similar uses at the neighbourhood level</u></p> <p>Policy H15 (Purpose-built Student Accommodation) of the Publication London Plan requires student accommodation to contribute to a mixed and inclusive neighbourhood at the neighbourhood level. As part of this assessment, we consider that the decision-maker has the discretion to consider the matter of over-concentration as one of a number of indicators to determine whether proposed development would contribute to a mixed and inclusive neighbourhood. As Criterion 1 of Policy LP30 requires development to meet all requirements of Policy H15, we consider that the inclusion of a specific criterion in relation to over-concentration is unnecessary and superfluous as such an assessment is already provided for under Policy H15.</p> <p>Without prejudice to our recommendation, should the Council seek to retain the wording we would recommend that greater clarity is provided in respect of how the Council would interpret what would be considered to represent overconcentration and what the impacts of over-concentration are. In our opinion the current drafting would render the Plan unsound as this strand of the policy is not justified and would not make the Plan effective. For example, we are aware that the London Borough of Brent in respect of the Wembley Area Action Plan used a quantitative approach to define over-concentration by setting a maximum percentage of 20% of the Wembley population comprising students before an over-concentration was considered to occur. We also recommend that greater clarification is given towards how one should interpret what is considered to be the 'neighbourhood level' as neither policy nor supporting text currently seeks to define it.</p> <p><u>4) meets the need for such accommodation as identified in the Wandsworth Local Housing Need Assessment or in any Accommodation Strategy of a recognised educational institution which has been agreed by the Council</u></p> <p>We consider that this criterion is not consistent with the Publication London Plan as it does not account for the Londonwide student housing need of 3,500 bed spaces per year. We also consider that the requirement for need to be demonstrated through an Accommodation Strategy of a recognised educational institution as unnecessary when criterion 3 of Policy H15 of the Publication London Plan already requires the majority of bedrooms in a development to be secured through a nominations agreement with one or more higher education providers. Indeed, this provision already deters speculative student applications and ensure that applications that come forward are driven by need.</p> <p><u>5) provides a high quality living environment, including the provision of good-sized rooms, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation);</u></p> <p>We are of the view that the wording of "good-sized rooms" is vague and imprecise. As an alternative, we would suggest "appropriately-sized rooms" as a replacement as it allows the decision-maker to draw on precedent developments with a view to understanding what the market expectation is for room sizes. We would also recommend that "natural ventilation" is replaced with "ventilation" as there are instances where mechanical ventilation is a more suitable alternative to natural ventilation, particularly when there are local noise and / or air quality constraints.</p> <p>Proposed Amendments to Policy LP30</p> <p>Our recommended amendments to Policy LP30 are set out below in red.</p> <p>LP30 Purpose Built Student Accommodation</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ol style="list-style-type: none"> <li>1. <u>To meet the need identified in the London Plan and the Wandsworth Local Housing Needs Assessment, Proposals</u> for Purpose Built Student Accommodation will be supported where the development:           <ol style="list-style-type: none"> <li>2. meets all requirements for student accommodation, including affordable provision, as set out in the emerging London Plan Policy H15;</li> <li>3. has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;</li> <li>4. <del>would not result in an over-concentration of similar uses at the neighbourhood level;</del></li> <li>5. meets the need for such accommodation as identified in the London Plan or Wandsworth Local Housing Need Assessment <del>or in any Accommodation Strategy of a recognised educational institution which has been agreed by the Council;</del></li> <li>6. provides a high quality living environment, including the provision of <del>good-sized</del> <u>appropriately sized</u> rooms, wellintegrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and <del>natural</del> ventilation);</li> <li>7. provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users; and</li> <li>8. is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents <del>in the neighbourhood – in the vicinity of the site.</del></li> </ol> </li> </ol> <p>The loss of existing <u>purpose-built</u> student accommodation will be resisted unless it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements.</p>		
Imperial College London		Charlotte Orrell	Senior Futures Consultant Iceni Projects	1235	Policy LP30	See attachment for detailed response to LP30	<p>There is no requirement to specifically make provisions for the conversion of student accommodation to co-living accommodation as part of policy LP30 (now LP28). The loss of student accommodation and provision of co-living housing will be considered having regard to policies LP30 (now LP28) and LP31 (now LP29), respectively.</p> <p>It is agreed that the provision of active ground floor uses might in some cases be acceptable even if such proposal results in a small reduction of student accommodation floorspace. It is however not agreed that the policy should acknowledge that the loss of student accommodation should be acceptable where it can be demonstrated that the building is no longer fit for purpose. This could lead to a loss of student accommodation despite current or future need being unmet. The amendment to Part B of the policy will help in adapting traditional student accommodation models to current needs and making them fit for purpose.</p> <p>The provision of co-living or Build to Rent housing alongside new student accommodation will be considered having regard to policies LP31 (now LP29) and LP32 (now LP30), respectively.</p> <p>The policy deals with purpose-built student accommodation rather than key worker accommodation.</p>	Policy LP30 amended to allow for the provision of active ground floor uses.
Ian Harrison	Director Downing	Mrs Jan Donovan	Director Rolfe Judd Planning	1373	Policy LP30	<p><b>See attachment on comment 1371 for full representation and context</b></p> <p><b>Draft Policy LP30 Purpose Built Student Accommodation</b></p> <p>The draft PBSA policy sets out criteria for the appropriateness of student accommodation. Wandsworth are proposing to adopt the GLA H15 policy for student accommodation. The Policy then sets further criteria for student accommodation.</p> <p><b>Response</b></p> <p>Paragraph 4.15.2 of the New London Plan notes that ' the overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be</p>	<p>It is agreed that the Local Plan should seek to ensure that local and strategic need for purpose-built student accommodation is met. The policy has been revised to refer to meeting the need of both higher education providers in Wandsworth and of institutions within a reasonable travelling distance of Wandsworth.</p>	Policy LP30 (now LP28) and the associated supporting text amended to clarify that proposals for new student accommodation must be supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>provided annually over the Plan period has been identified. Meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.'</p> <p>And at paragraph 4.15.3 .... There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed.</p> <p><b>Representation</b></p> <p><b>Downing therefore consider that LP30 part 4. is unduly restrictive and should be deleted, particularly as LP30.1 of the draft policy requires the PBSA to meet all the requirements of Policy H15 of the New London Plan.</b></p>		
DTZ Investors		Neil Wells	Quod	1510	Policy LP30	<p>LP30 Purpose Built Student Accommodation – OBJECT</p> <p>The London Plan recognises that London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The completion of new Purpose-Built Student Accommodation (PBSA) contributes to meeting London's overall housing need and is not in addition to this need.</p> <p>Policy LP30(A)(1) of the draft Local Plan states that proposals for Purpose Built Student Accommodation will be supported where the development meets all requirements for student accommodation, including affordable provision, as set out in Policy H15 (Purpose-built student accommodation) of the Publication London Plan (2020). The remained of Policy LP30 should therefore be written to remain consistent with London Plan Policy.</p> <p>DTZi request the removal of LP30(A)(3) which states that Student Accommodation will be supported where the development would not result in an over-concentration of similar uses at the neighbourhood level. Policy H15 of the London Plan does not include such restrictive wording, and instead states that development should contribute to a mixed and inclusive neighbourhood. The Local Plan should be consistent with the wording within the London Plan (2020), and therefore the policy as currently worded should be removed.</p> <p><del>LP30(A)(3) would not result in an over-concentration of similar uses at the neighbourhood level;</del></p> <p>The Local Plan evidence base is clear there is need for Student Accommodation within the Borough, and the London Plan's evidence base also highlights a need across London.</p> <p>Wandsworth's own Local Housing Needs Assessment (December 2020) which is part of the draft Plan's evidence base identifies a need for circa 800 student bed spaces between 2018-2019 and 2024-25 to meet the planned growth associated with the University of Roehampton alone; whilst the Local Housing Needs Assessment also considers the potential growth of St George's, University of London. Paragraph 4.15.2 of the London Plan states that the overall strategic requirement for Purpose-Built Student Accommodation in London has been established through the work of the Mayor's Forum; which has identified a requirement for 3,500 purpose-built student accommodation bed spaces.</p> <p>The use of suitable &amp; available sites across Wandsworth for student accommodation should therefore not be restricted.</p>	<p>It is agreed that the Local Plan should seek to ensure that local and strategic need for purpose-built student accommodation is met. The policy has been revised to refer to meeting the need of both higher education providers in Wandsworth and of institutions within a reasonable travelling distance of Wandsworth.</p> <p>An over-concentration of student accommodation might be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure. Policy LP30 reinforces the intent of the London Plan.</p>	Policy LP30 (now LP28) and the associated supporting text amended to clarify that proposals for new student accommodation must be supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth.
Mr Robert Arguile	Chair The Putney Society			402	Policy LP31	<p>Generally supported as providing for the younger professional population, but some way should be found to support later life co-living too.</p> <p>LP31.A Where converted from large houses HMOs need sufficient communal space unless all bedrooms are large. This probably means more than one living room.</p>	Developments delivering conventional housing will also provide housing options for single persons or sharers. Conventional units can accommodate both sharers and families, whereas co-living units can only generally accommodate single persons or sharers. Conventional housing therefore presents a more adaptable housing model.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							Policy LP31 (now LP29) requires HMOs to provide a good quality of accommodation, in line with Policy LP 29 (now LP27).	
Monica Tross	Sectary to planning committee  Battersea Society			816	Policy LP31	<b>LP 31 Housing with Shared Facilities</b>  Evidence suggests that designated Houses in Multiple Occupation (HMO) are vastly outstripped in volume by the numbers of houses and flats shared by young adult friends. Flat sharing and houses with one or more lodgers are pervasive across the borough. Nevertheless, the policies proposed for HMOs strike a reasonable balance. We support the proposed resistance to large-scale purpose-built shared living accommodation. We would certainly not want to see any further developments of this kind such as that in Chatfield Road which recently received consent, or that proposed for Hazel Court.	Support noted.	No change to the Local Plan required as a result of this representation.
The Collective				844	Policy LP31	This note sets out our comments pursuant to draft policy LP31 –‘Housing with Shared Facilities’. The policy wording is currently under consultation as part of the Draft Local Plan Pre-Publication Version. This note also includes a revised version of the draft policy based on the incorporation of our comments. The Collective’s comments <ul style="list-style-type: none"> <li>We wholly support the formation of a planning policy for purpose-built shared living accommodation. Policy can provide a level of consistency which will ensure only high quality shared living developments are built and operated in the borough.</li> <li>We consider that the opening words ‘will generally be resisted’ in the draft policy are unjustified as purpose-built shared living accommodation can play a valuable role in meeting an acute housing need, promoting mixed and balanced communities and supporting the contribution to the delivery of affordable housing.</li> <li>The opening statement of general resistance also conflicts with the recently adopted London Plan Policy H16 which promotes shared living accommodation subject to a number of policy tests. The NPPF dictates that the borough’s local plan should be in general conformity with the London Plan. Legally, the London Plan should be taken into account for all planning decisions in London. <ul style="list-style-type: none"> <li>The Local Housing Need Assessment which underpins the draft policy currently does not objectively assess the need for single person accommodation which shared living addresses. A comprehensive market assessment compiled by Knight Frank in 2019 in support of our shared living planning applications identified that Wandsworth has a higher proportion of single person and sharing households compared to the London average. If the need is not met through the provision of purpose built accommodation then this can lead to unregulated housing models, with people looking for housing solutions in other parts of the housing market.</li> </ul> </li> <li>Shared living also has a strong community focus. It appeals to residents who wish to stay for a number of years. At our developments in Wandsworth we have agreed to exclusively market the homes first to local people and have an obligation to offer residents minimum tenancies of 6 months. These arrangements ensure that shared living creates mixed and balanced communities.</li> <li>As recognised by the London Plan a household equates to 1.8 shared living units. As an intensified housing product shared living can contribute towards Wandsworth’s overall housing targets.</li> <li>We support that local housing need should be examined as per policy test point no.2. With regards to policy test under point no.4 we consider that there may be sites where the development of conventional housing may be attainable however the delivery of shared living accommodation may be more appropriate due to better meeting local need or providing community function. We would propose that the policy incorporates a more flexible position here to allow for a</li> </ul>	The key constraint in Wandsworth is the availability of land for development and this has been a factor when formulating various Local Plan policies. A more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing (or other Local Plan priority uses) which meet an evidenced need. Delivery of affordable housing is a key priority of the Local Plan. Large-scale purpose-built shared living accommodation is non-self-contained accommodation, which would preclude delivery of genuinely affordable housing tenures.  The LHNA makes it clear that there is an acute need for self-contained residential dwellings, and in particular for affordable rented and Affordable Home Ownership (AHO) dwellings in the borough. It recommends the following: ‘In the event housing capacity restricts LBW to meet its objectively assessed housing need or affordable housing need, it is suggested that LBW consider conventional forms of housing ahead of co-living developments’. Using the revised standard method published on 16 December 2020, the minimum number of homes needed in Wandsworth is 3,425 dwellings per annum. The Housing and Economic Land Availability Assessment identified that the objectively assessed housing need is far in excess of the borough’s identified sources of housing capacity for years 1 to 10 of the plan period. This means that there is scope to develop a restrictive approach to large-scale purpose-built shared living, in accordance with the LHNA.  Large-scale purpose-built shared living, while potentially attractive to some limited demographics, is a niche product. It is essentially student accommodation for adults, which is not a suitable or desirable type of accommodation for the population at large, particularly families or people who desire any space to store belongings. Therefore, they will not be suitable for a broad range of occupiers in the future, which essentially removes the ability of any land developed for large-scale HMOs to meet needs for the foreseeable future; or would result in costly renovations/redevelopment which undermine Local Plan sustainability policies.  While the Wandsworth’s Local Plan policy goes further than the London Plan, we note that the Greater London Authority have not raised any objections to policy LP31 (now Lp29) in their representations on the Local Plan. Paragraph 4.16.1 of the London Plan states that large-scale purpose-built shared living may be suitable for single person households who cannot or choose not to live in self-contained homes or HMOs. This supports the Council’s view about the limited scope/appeal of this product and that it will not offer any meaningful support in terms of addressing housing need. The wording of the policy is therefore considered justified.  The private space provided by most developments consists solely of bedrooms and therefore does not cater for the needs of residents who wish to continue to live within the borough, but rather for a more transient occupier. Large-scale purpose-built shared living schemes are therefore less likely to appeal to residents who wish to stay for a number of years.  It is not disputed that purpose-built shared living accommodation can contribute towards meeting the housing target. However, development proposals must also contribute to meeting the housing need.  It is agreed that a management plan should be provided at an early stage through engagement with the Council.	Supporting text of policy LP31 (now LP29) expanded to set out the requirements for the provision of a management plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>contextual response. We would suggest amending the wording to 'it should be clearly demonstrated that it is beneficial to deliver shared living accommodation on the site rather than conventional housing units' on this basis.</p> <ul style="list-style-type: none"> <li>With regards to the policy test under point no.7, we strongly agree with the importance of demonstrating through a management plan that the development will be managed and maintained over its lifetime as to maintain quality for occupiers and not impact detrimentally on the amenities of existing residents in the neighbourhood. We consider though that the policy could be stronger here to ensure only the highest quality shared living developments are operated in the borough. This could be achieved by an operator engaging with the Council to discuss their proposed operational model and supporting this by providing precedent of where they have operated similar buildings successfully over a long term period. On this basis, we would propose adding that the 'Council will encourage individual operators to work with the Council to agree an acceptable operating model for a shared accommodation proposal'. Providing this opportunity for the Council to engage and fully understand the operational intention of a developer will ensure only the highest quality shared living developments are brought forward and operated in the borough. Revised draft policy position (additions in bold): Large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be supported where it is clearly demonstrated that: 1. such development meets all of the criteria set out in the emerging London Plan Policy H16; 2. it can be clearly demonstrated that there is an identified local need for the type of accommodation proposed; 3. it would not lead to an overconcentration of single-person accommodation at the neighbourhood level; 4. it can be clearly demonstrated that the site is not suitable for development for conventional units it is beneficial to deliver shared living accommodation on the site rather than conventional housing units; 5. it would not give rise to adverse impacts on the amenity of neighbouring properties, the character of the neighbourhood or would not support the creation of mixed and balanced communities; 6. it can be demonstrated that the development would be capable of adaptation to alternative residential use should there no longer be a need for such accommodation; 7. it has been demonstrated through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and 8. a financial contribution has been secured towards the provision of affordable dwellings in the borough in accordance with the emerging London Plan policies and those contained in this Plan. Where proposals for shared living accommodation are deemed appropriate in principle the Council will encourage individual operators to work with the Council to agree an acceptable operating mode</li> </ul> <p>development of conventional housing may be attainable however the delivery of shared living accommodation may be more appropriate due to better meeting local need or providing community function. We would propose that the policy incorporates a more flexible position here to allow for a contextual response. We would suggest amending the wording to 'it should be clearly demonstrated that it is beneficial to deliver shared living accommodation on the site rather than conventional housing units' on this basis. •With regards to the policy test under point no.7, we strongly agree with the importance of demonstrating through a management plan that the development will be managed and maintained over its lifetime as to maintain quality for occupiers and not impact detrimentally</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>on the amenities of existing residents in the neighbourhood. We consider though that the policy could be stronger here to ensure only the highest quality shared living developments are operated in the borough. This could be achieved by an operator engaging with the Council to discuss their proposed operational model and supporting this by providing precedent of where they have operated similar buildings successfully over a long term period. On this basis, we would propose adding that the 'Council will encourage individual operators to work with the Council to agree an acceptable operating model for a shared accommodation proposal'.</p> <p>Providing this opportunity for the Council to engage and fully understand the operational intention of a developer will ensure only the highest quality shared living developments are brought forward and operated in the borough. Revised draft policy position (additions in bold): Large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be supported where it is clearly demonstrated that:</p> <ol style="list-style-type: none"> <li>1. such development meets all of the criteria set out in the emerging London Plan Policy H16;</li> <li>2. it can be clearly demonstrated that there is an identified local need for the type of accommodation proposed;</li> <li>3. it would not lead to an overconcentration of single-person accommodation at the neighbourhood level;</li> <li>4. it can be clearly demonstrated that the site is not suitable for development for conventional units it is beneficial to deliver shared living accommodation on the site rather than conventional housing units;</li> <li>5. it would not give rise to adverse impacts on the amenity of neighbouring properties, the character of the neighbourhood or would not support the creation of mixed and balanced communities;</li> <li>6. it can be demonstrated that the development would be capable of adaptation to alternative residential use should there no longer be a need for such accommodation;</li> <li>7. it has been demonstrated through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood;</li> <li>and 8. a financial contribution has been secured towards the provision of affordable dwellings in the borough in accordance with the emerging London Plan policies and those contained in this Plan.</li> </ol> <p>Where proposals for shared living accommodation are deemed appropriate in principle the Council will encourage individual operators to work with the Council to agree an acceptable operating mode</p>		
Dandi Five Ltd Dandi Living		Mr Mark Thomson	Associate Director Savills	1092	Policy LP31	<p>3. Policy LP31 (Housing with Shared Facilities) We welcome and support that there is a specific policy relating to co-living and large scale shared living uses. Furthermore, we support the recognition of the value and need for this alternative housing product, as set out in supporting paragraph 17.61. Whilst we note that paragraph 17.62 refers to the Council's Local Housing Needs Assessment (2020) and highlights self-contained residential dwellings should be the priority focus for the borough, that does not negate or remove that there is an identified need for shared living accommodation. Recent evidence (Co-Living Need Assessment) to support the planning application at Hazel Court (ref: 2020/2560) clearly demonstrates that there is a clear need for co-living and shared living accommodation within the borough.</p> <p>3 Based on the above, and in respect of the proposed wording of Policy LP31 we request that Part C is amended in two parts. The reason for the amendments is to ensure the policy is to ensure that the policy is clearly written and unambiguous. The current wording in parts is ambiguous and seeks to unnecessarily resist co-living as a form of housing. The reference to 'generally be resisted' at LP31(C) is unnecessary as the policy wording below provide the policy criteria for where such development will be supported. LP31(C)(4) is requested to be omitted as it is ambiguous and it is not evident how a decision maker should react to development proposals when applying the policy. In nearly any case, a site capable of accommodating a 50+ unit co-living or large scale shared living development could be suitable for conventional units. For example, a 50 unit co-living development with 20sqm rooms and communal amenity provision at a rate of 5sqm per unit, results in a development of 1,250sqm of development. Any site capable of accommodating this amount of floorspace is likely to be suitable or capable of accommodating</p>	<p>The key constraint in Wandsworth is the availability of land for development and this has been a factor when formulating various Local Plan policies. A more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing (or other Local Plan priority uses) which meet an evidenced need. Delivery of affordable housing is a key priority of the Local Plan. Large-scale purpose-built shared living accommodation is non-self-contained accommodation, which would preclude delivery of genuinely affordable housing tenures.</p> <p>The LHNA makes it clear that there is an acute need for self-contained residential dwellings, and in particular for affordable rented and Affordable Home Ownership (AHO) dwellings in the borough. It recommends the following: 'In the event housing capacity restricts LBW to meet its objectively assessed housing need or affordable housing need, it is suggested that LBW consider conventional forms of housing ahead of co-living developments'. Using the revised standard method published on 16 December 2020, the minimum number of homes needed in Wandsworth is 3,425 dwellings per annum. The Housing and Economic Land Availability Assessment identified that the objectively assessed housing need is far in excess of the borough's identified sources of housing capacity for years 1 to 10 of the plan period. This means that there is scope to develop a restrictive approach to large-scale purpose-built shared living, in accordance with the LHNA.</p> <p>Large-scale purpose-built shared living, while potentially attractive to some limited demographics, is a niche product. It is essentially student accommodation for adults, which is not a suitable or desirable type of accommodation for the population at large, particularly families or people who desire any space to store belongings. Therefore, they will not be suitable for a broad range of occupiers in</p>	Supporting text of policy LP31 (now LP29) expanded to clarify how the Council will consider whether a proposal for large-scale purpose-built shared living would be located on a site which is suitable for conventional units.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>conventional units. The policy presents a policy test that is unclear and unduly restrictive. Furthermore, it is not clear how it can be demonstrated that a site is 'not suitable for development for conventional units' as both conventional units and co-living units are types of housing and in an urban Borough such as Wandsworth, they are likely to occupy and be suited to similar locations. The inclusion of LP31(C)(4) is not in accordance with paragraph 16 of the National Planning Policy Framework (NPPF) as it is unclear and ambiguous. Furthermore, the other 7 considerations under LP31(C) are clear and provide the decision maker with clearly written and unambiguous policy criteria on which to react to development proposals for co-living or shared living development. The requested amendments below maintain the majority of the policy wording, which aligns with London Plan Policy H16 (to be adopted on 2 March 2021), and results in a policy that is clear for a decision maker to understand and apply.</p> <p>First sentence (amend with new wording underlined as set out below) to replace current wording: "C. Large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' will only be supported where it is clearly demonstrated that:"</p> <p>Point 4 (omit from policy) "4.it can be clearly demonstrated that the site is not suitable for development for conventional units"</p>	<p>the future, which essentially removes the ability of any land developed for large-scale HMOs to meet needs for the foreseeable future; or would result in costly renovations/redevelopment which undermine Local Plan sustainability policies.</p> <p>While it is acknowledged that co-living accommodation can help to meet a specific housing need in Wandsworth (for recent graduates and young professional), this should not take priority over meeting need for conventional C3 housing. Delivering significant levels large-scale purpose-built shared living at the expense of conventional housing would affect Wandsworth's ability to meet the full range of housing need in the borough. Conventional units can accommodate both sharers and families, whereas co-living units can only generally accommodate single persons or sharers. Conventional housing therefore presents a more adaptable housing model. The wording of the policy is therefore considered justified.</p> <p>It is agreed that the policy should clarify how the Council will consider whether a proposal for large-scale purpose-built shared living would be located on a site which is suitable for conventional units.</p>	
Greystar Europe Holdings Ltd  and Big Yellow Self Storage		Nona Jones	Planner DP9	1159	Policy LP31	<p><b>See attachment for full context of representation.</b></p> <p><b>Policy LP31–Housing with Shared Facilities</b></p> <p>We support the inclusion of part C which deals specifically with large-scale purpose-built shared living accommodation (sui generis).</p> <p>The assumption that purpose built shared living will "generally be resisted" is a negative approach meaning that the policy has not been prepared in a positive manner which is contrary to paragraph 35 of the National Planning Policy Framework. It is also not consistent with Policy H16 of the Publication London Plan which supports the principle of the use subject to addressing a series of criteria.</p> <p>Both the Publication version of the London Plan and paragraph 041 of the NPPG states that communal accommodation contributes towards housing targets. This demonstrates that there is a clear need for purpose built shared living and this should be reflected by the policy.</p> <p>The draft policy states that such developments should meet the criteria set out in emerging London Plan Policy H16. It is therefore considered that these criteria are suitable to control such developments without there needing to be a general presumption against the use.</p> <p>Part number 2 states that "it can be clearly demonstrated that there is an identified local need for the type of accommodation proposed". Paragraph 47 of the National Planning Policy Framework states that housing policies should be based on full objectively assessed needs for market and affordable housing in the market area. This policy is based on an up to date assessment of housing need (Wandsworth Local Housing NeedsAssessment2020) which identifies a need for such accommodation. Furthermore, as set out above it should be recognised that the NPPG and Publication London Plan identifies that such communal housing contributes towards the Housing Delivery Test, which can therefore make a positive contribution to the Borough and Capital City's housing needs. On this basis, we propose that this requirement is removed or further clarity and guidance is provided on how this point can be addressed because as drafted it is open to interpretation and is not positively prepared nor consistent with national or strategic planning policy.</p>	<p>The key constraint in Wandsworth is the availability of land for development and this has been a factor when formulating various Local Plan policies. A more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing (or other Local Plan priority uses) which meet an evidenced need. Delivery of affordable housing is a key priority of the Local Plan. Large-scale purpose-built shared living accommodation is non-self-contained accommodation, which would preclude delivery of genuinely affordable housing tenures.</p> <p>The LHNA makes it clear that there is an acute need for self-contained residential dwellings, and in particular for affordable rented and Affordable Home Ownership (AHO) dwellings in the borough. It recommends the following: 'In the event housing capacity restricts LBW to meet its objectively assessed housing need or affordable housing need, it is suggested that LBW consider conventional forms of housing ahead of co-living developments'. Using the revised standard method published on 16 December 2020, the minimum number of homes needed in Wandsworth is 3,425 dwellings per annum. The Housing and Economic Land Availability Assessment identified that the objectively assessed housing need is far in excess of the borough's identified sources of housing capacity for years 1 to 10 of the plan period. This means that there is scope to develop a restrictive approach to large-scale purpose-built shared living, in accordance with the LHNA.</p> <p>Large-scale purpose-built shared living, while potentially attractive to some limited demographics, is a niche product. It is essentially student accommodation for adults, which is not a suitable or desirable type of accommodation for the population at large, particularly families or people who desire any space to store belongings. Therefore, they will not be suitable for a broad range of occupiers in the future, which essentially removes the ability of any land developed for large-scale HMOs to meet needs for the foreseeable future; or would result in costly renovations/redevelopment which undermine Local Plan sustainability policies.</p> <p>While it is acknowledged that co-living accommodation can help to meet a specific housing need in Wandsworth (for recent graduates and young professional), this should not take priority over meeting need for conventional C3 housing. Delivering significant levels large-scale purpose-built shared living at the expense of conventional housing would affect Wandsworth's ability to meet the full range of housing need in the borough. Conventional units can accommodate both sharers and families, whereas co-living units can only generally accommodate single persons or sharers. Conventional housing therefore presents a more adaptable housing model. The wording of the policy is therefore considered justified.</p> <p>It is not disputed that purpose-built shared living accommodation can contribute</p>	<p>Policy LP31 (now LP29) amended to remove the requirement to demonstrate that the development would be capable of adaptation to alternative residential use.</p> <p>Supporting text of policy LP31 (now LP29) amended to clarify that a financial contribution towards the provision of affordable dwellings will be required.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Part number 4 of this policy requires that "it can be clearly demonstrated that the site is not suitable for development for conventional units" whereas part6 states "it can be demonstrated that the development would be capable of adaptation to alternative residential use should there no longer be a need for such accommodation". These two requirements are contradictory to one another. Furthermore, purpose built shared living accommodation is a form of residential accommodation which makes a contribution to housing delivery, therefore, we propose that 4 and 6 are removed in their entirety from Policy LP31.</p> <p>Part 8 of the Policy requires "a financial contribution has been secured towards the provision of affordable dwellings in the borough in accordance with the emerging London Plan policies and those contained in this Plan". However, sub-text17.65 of this policy only requires "proposals for large-scale purpose-built accommodation will be expected to contribute to the delivery of affordable housing, in line with the emerging London Plan policies" with no reference to Local Plan Policies. Further clarification is therefore required on this matter. As the level of financial contributions is to be in accordance with the emerging London Plan, we suggest reference to the Local Plan's affordable housing policy, which does not cover housing with shared facilities, is omitted from this Policy for clarity.</p> <p>We request that part 8 of Policy LP31 is also expanded to confirm that financial contributions will be secured on a case-by-case basis having regard to financial viability as per sub-text 17.65</p>	<p>towards meeting the housing target. However, development proposals must also contribute to meeting the housing need.</p> <p>It is agreed that the policy should not require the submission of evidence demonstrating that the site is not suitable for development for conventional units, while also requiring evidence that the development would be capable of adaptation to alternative residential use.</p> <p>It is agreed that the supporting text should clarify that a financial contribution towards the provision of affordable dwellings will be required.</p>	
Mr Ben Wrighton	Strategic Planning Director Watkin Jones Group	Sam Stackhouse	Associate Montagu Evans LLP	1262	Policy LP31	<p><b>See comment 1261 for attachment with full representation</b></p> <p>LP31 – Housing with Shared Facilities Our Client's representations to Policy LP31 are limited to Part C only which relates to large-scale purpose-built shared living accommodation, also commonly known as Co-living . Part C currently states:</p> <p>As a general point, we would note that the tone of the policy is negative in so far that it seeks to generally resist such development. We therefore consider that the policy is not positively prepared or consistent with national policy i.e. being prepared with the objective of contributing to the achievement of sustainable development (Paragraph 16a of the NPPF). It is also not consistent with the Publication London Plan which adopts a more positive approach to the provision of largescale purpose-built shared living.</p> <p>We would also note Paragraph 041 (Reference ID: 68-041-20190722) of the NPPG which states that communal accommodation can count towards the Housing Delivery Test and this is reinforced by Paragraph 4.1.9 of the Publication London Plan. In our view, it is implicit that there is a role for large-scale purpose built shared accommodation to play in meeting objectively assessed housing needs and therefore it should be positively planned for.</p> <p>In respect of the proposed criteria under Part C of Policy LP31 for which the Council will assess applications for largescale purpose-built shared living accommodation, we would make the following recommendations:</p> <p>2. it can be clearly demonstrated that there is an identified local need for the type of accommodation proposed;</p> <p>We have reservations about this strand of the policy as Paragraph 47 of the National Planning Policy Framework states that housing policies should be based on full objectively assessed needs for market and affordable housing in the market area. The market area, however, can be different to the local area and therefore we would argue that the current wording is not consistent with national policy. We would also note that this policy is based on an up to date assessment of housing need through the Wandsworth Local Housing Needs Assessment which identifies a need for such accommodation and therefore we would question why such a criterion is required anyway. We would therefore recommend that this strand of the policy is removed or, at the very least, it is amended so that the term "local" is omitted as its meaning is not clear or</p>	<p>The key constraint in Wandsworth is the availability of land for development and this has been a factor when formulating various Local Plan policies. A more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing (or other Local Plan priority uses) which meet an evidenced need. Delivery of affordable housing is a key priority of the Local Plan. Large-scale purpose-built shared living accommodation is non-self-contained accommodation, which would preclude delivery of genuinely affordable housing tenures.</p> <p>The LHNA makes it clear that there is an acute need for self-contained residential dwellings, and in particular for affordable rented and Affordable Home Ownership (AHO) dwellings in the borough. It recommends the following: 'In the event housing capacity restricts LBW to meet its objectively assessed housing need or affordable housing need, it is suggested that LBW consider conventional forms of housing ahead of co-living developments'. Using the revised standard method published on 16 December 2020, the minimum number of homes needed in Wandsworth is 3,425 dwellings per annum. The Housing and Economic Land Availability Assessment identified that the objectively assessed housing need is far in excess of the borough's identified sources of housing capacity for years 1 to 10 of the plan period. This means that there is scope to develop a restrictive approach to large-scale purpose-built shared living, in accordance with the LHNA.</p> <p>Large-scale purpose-built shared living, while potentially attractive to some limited demographics, is a niche product. It is essentially student accommodation for adults, which is not a suitable or desirable type of accommodation for the population at large, particularly families or people who desire any space to store belongings. Therefore, they will not be suitable for a broad range of occupiers in the future, which essentially removes the ability of any land developed for large-scale HMOs to meet needs for the foreseeable future; or would result in costly renovations/redevelopment which undermine Local Plan sustainability policies.</p> <p>While it is acknowledged that co-living accommodation can help to meet a specific housing need in Wandsworth (for recent graduates and young professional), this should not take priority over meeting need for conventional C3 housing. Delivering significant levels large-scale purpose-built shared living at the expense of conventional housing would affect Wandsworth's ability to meet the full range of housing need in the borough. Conventional units can accommodate both sharers and families, whereas co-living units can only generally accommodate single persons or sharers. Conventional housing therefore presents a more adaptable housing model. The wording of the policy is therefore considered justified.</p> <p>While the Wandsworth's Local Plan policy goes further than the London Plan, we</p>	<p>Policy LP31 (now LP29) amended to remove the requirement to demonstrate that the development would be capable of adaptation to alternative residential use.</p> <p>Supporting text of policy LP31 (now LP29) amended to clarify that a financial contribution towards the provision of affordable dwellings will be required.</p> <p>Supporting text of policy LP31 (now LP29) expanded to clarify how the Council will consider whether a proposal for large-scale purpose-built shared living would be located on a site which is suitable for conventional units.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>defined and conflicts with national policy. If necessary, we consider that demonstrating an "identified need" would still fulfil the objectives of this aspect of the policy which is to ensure that applications are not speculatively driven and are meeting a need that is currently not being provided.</p> <p>3) it would not lead to an overconcentration of single-person accommodation at the neighbourhood level;</p> <p>Similarly to the comments made in respect of Policy LP30 above, Policy H16 (Large-scale purpose-built shared living) of the Publication London Plan requires such accommodation to contribute to a mixed and inclusive neighbourhood at the neighbourhood level. As part of this assessment, we consider that the decision-maker has the discretion to consider the matter of over-concentration as one of a number of indicators to determine whether proposed development would contribute to a mixed and inclusive neighbourhood. As Criterion C1 of Policy LP31 requires development to meet all requirements of Policy H16, we consider that the inclusion of a specific criterion in relation to over-concentration is unnecessary and superfluous as such an assessment is already provided for under Policy H16.</p> <p>4) it can be clearly demonstrated that the site is not suitable for development for conventional units.</p> <p>According to Paragraph 17.63 of the supporting text of this policy, the reason for this criterion is to ensure that development does not compromise opportunities for more conventional forms of self-contained housing to be delivered. Whilst it is accepted that the local planning authority has a duty to plan appropriately to meet its objectively assessed housing needs over the plan period, our view is that this need should be planned positively through specific positively- worded housing policies and site allocations, and not through other land use policies, particularly where a need for such uses has been identified. Indeed, Paragraph 67 of the NPPF states that planning policies should identify specific deliverable sites in the short term and specific developable sites in the medium to long-term to meet housing needs. We note that Wandsworth as a Borough purports to be able to achieve this through the Housing and Economic Land Availability Assessment (2021) which identifies that it can demonstrate a pipeline of housing that exceeds the London Plan target of 19,500 homes over the next 10 years. As such, it is evident that the Borough can demonstrate sufficient sites to meet its housing needs without having to apply a residential land use suitability test against sites that come forward for other land uses. For this reason and as this element of the policy is not positively prepared, our Client recommends that this criterion is removed. Should the Council seek to retain this element of the policy, we strongly recommend that greater clarification is provided in respect of how the decision-maker might assess whether a site is suitable for residential development for conventional units, particularly as one would expect site suitability for large-scale purpose-built shared living or Class C3 conventional units to be precisely the same given that they are both ultimately providing homes for people. As things stands, the policy strand is not effective or justified. We would also note the criterion directly conflicts with Criterion 6 which requires the development to demonstrate that it would be capable of future adaption to residential use.</p> <p>Proposed Amendments to Policy LP31</p> <p>Our recommended amendments to Policy LP31 are set out below in red.</p> <p>LP31 Housing with Shared Facilities</p> <ol style="list-style-type: none"> <li>1. Large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will <del>be supported generally be resisted. Such accommodation will only be supported</del> where it is clearly demonstrated that:</li> <li>2. such development meets all of the criteria set out in the emerging London Plan Policy H16;</li> <li>3. it can be clearly demonstrated that there is an identified local-need for the type of accommodation proposed;</li> </ol>	<p>note that the Greater London Authority have not raised any objections to policy LP31 (now LP29) in their representations on the Local Plan. Paragraph 4.16.1 of the London Plan states that large-scale purpose-built shared living may be suitable for single person households who cannot or choose not to live in self-contained homes or HMOs. This supports the Council's view about the limited scope/appeal of this product and that it will not offer any meaningful support in terms of addressing housing need.</p> <p>It is not disputed that purpose-built shared living accommodation can contribute towards meeting the housing target. More importantly, development proposals must also contribute to meeting the housing need.</p> <p>It is agreed that the policy should not require the submission of evidence showing that the development would be capable of adaptation to alternative residential use.</p> <p>It is agreed that the policy should clarify how the Council will consider whether a proposal for large-scale purpose-built shared living would be located on a site which is suitable for conventional units.</p> <p>This requirement to meet local housing need is included to help ensure the accommodation is meeting local need rather than attracting higher-earning tenants from outside the borough.</p> <p>The policy goes further than the London Plan by clearly setting out how overconcentration of single-person accommodation at the neighbourhood level will be assessed. There is a risk of overconcentration and harm to the mix and balance of uses in these neighbourhoods if several similar schemes come forward in close proximity. The policy provision is therefore justified.</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>4. it would not lead to an overconcentration of single-person accommodation at the neighbourhood level;</p> <p>5. it can be clearly demonstrated that the site is not suitable for development for conventional units;</p> <p>6. it would not give rise to adverse impacts on the amenity of neighbouring properties, the character of the neighbourhood or would not support the creation of mixed and balanced communities;</p> <p>7. it can be demonstrated that the development would be capable of adaptation to alternative residential use should there no longer be a need for such accommodation;</p> <p>8. it has been demonstrated through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and a financial contribution has been secured towards the provision of affordable dwellings in the borough in accordance with the emerging London Plan policies. and those contained in this Plan.</p>		
DTZ Investors		Neil Wells	Quod	1511	Policy LP31	<p>LP31(C) Housing with Shared Facilities – OBJECT</p> <p>DTZi object to Part C of Policy LP31 Housing with Shared Facilities, which states that “Large-scale purpose-built shared living accommodation which is defined as being a ‘sui generis’ use will generally be resisted”. This policy is negatively written, and therefore has the potential to stymie development land suitable for housing.</p> <p>The NPPF refers specifically to the need to deliver more homes, at a greater density, on brownfield land; and Paragraph 041 (Reference ID: 68-041-20190722) of the NPPG states that communal accommodation can count towards the Housing Delivery Test. We therefore request the resistance to proposals for large-scale purpose-built shared living accommodation is removed from this policy; and request the policy wording is amended as follows:</p> <p>1. Large-scale purpose-built shared living accommodation which is defined as being a ‘sui generis’ use will <del>generally be resisted</del>. Such accommodation will only be supported where it is clearly demonstrated that..</p> <p>Further, Part 4 of the Policy (LP31(C)(4)) is also considered to stymie investment in new development for Housing with Shared Facilities, and we therefore request this is removed:</p> <p><del>It can be clearly demonstrated that the site is not suitable for development for conventional units</del></p>	<p>The key constraint in Wandsworth is the availability of land for development and this has been a factor when formulating various Local Plan policies. A more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing (or other Local Plan priority uses) which meet an evidenced need. Delivery of affordable housing is a key priority of the Local Plan. Large-scale purpose-built shared living accommodation is non-self-contained accommodation, which would preclude delivery of genuinely affordable housing tenures.</p> <p>The LHNA makes it clear that there is an acute need for self-contained residential dwellings, and in particular for affordable rented and Affordable Home Ownership (AHO) dwellings in the borough. It recommends the following: ‘In the event housing capacity restricts LBW to meet its objectively assessed housing need or affordable housing need, it is suggested that LBW consider conventional forms of housing ahead of co-living developments’. Using the revised standard method published on 16 December 2020, the minimum number of homes needed in Wandsworth is 3,425 dwellings per annum. The Housing and Economic Land Availability Assessment identified that the objectively assessed housing need is far in excess of the borough’s identified sources of housing capacity for years 1 to 10 of the plan period. This means that there is scope to develop a restrictive approach to large-scale purpose-built shared living, in accordance with the LHNA.</p> <p>Large-scale purpose-built shared living, while potentially attractive to some limited demographics, is a niche product. It is essentially student accommodation for adults, which is not a suitable or desirable type of accommodation for the population at large, particularly families or people who desire any space to store belongings. Therefore, they will not be suitable for a broad range of occupiers in the future, which essentially removes the ability of any land developed for large-scale HMOs to meet needs for the foreseeable future; or would result in costly renovations/redevelopment which undermine Local Plan sustainability policies.</p> <p>While it is acknowledged that co-living accommodation can help to meet a specific housing need in Wandsworth (for recent graduates and young professional), this should not take priority over meeting need for conventional C3 housing. Delivering significant levels large-scale purpose-built shared living at the expense of conventional housing would affect Wandsworth’s ability to meet the full range of housing need in the borough. Conventional units can accommodate both sharers and families, whereas co-living units can only generally accommodate single persons or sharers. Conventional housing therefore presents a more adaptable housing model. The wording of the policy is therefore considered justified.</p>	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			403	Policy LP32	This rightly mostly refers to other policies. All housing should be built to the same standards taking a long term view that tenure may change over time.	Comment noted.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Kin Development		Ben Ford	Director Quod	1048	Policy LP32	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Policy LP32 Build to Rent - OBJECT</b></p> <p>We are concerned that the requirements of Policy LP32 fail to conform with Policy H11 of the London Plan and impose onerous requirements on the delivery of Build to Rent housing. The tenure of the affordable housing required (London Affordable Rent (50%) and London Living Rent (50%)) exceeds the Fastrack Requirement of the London Plan (30% London Living Rent and 70% Discount Market Rent) and the approach has not been justified by a viability assessment.</p> <p>3. provide on-site affordable housing, in line with the threshold approach set out in the emerging London Plan. <u>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%)</u></p> <p>Kin do not consider that the tenure requirements for build to rent schemes should be the same as for sale schemes recognising the differences in scheme viability and management of the homes. The London Plan sets out the policy expectation for affordable housing to be provided as Discount Market Rent with at least 30% at London Living Rent levels, the policy as drafted by Wandsworth does not contain any reference to Discount Market Rent. The policy as drafted is more onerous for Build to Rent schemes to follow the Threshold Approach as 50% have to be provided London Living Rent levels vs for sale is 50% shared ownership. The viability testing of this tenure provision needs to be robustly evidenced and compared to the for-sale modelling to ensure the tenure mix requirements are financially viable and align with the London Plan. The new Local Plan needs to be also clearer on management of affordable homes alongside build to rent schemes given traditionally homes are sold to a registered provider, if homes are pepper potted they will likely be managed by the build to rent operator.</p>	<p>The policy has been revised to align with the London Plan. Paragraph 4.11.10 of the London Plan states that the proportion of low-cost rent (Social Rent or London Affordable Rent) can be determined by the borough in line with policy H6. Policy H6 allows for a 50:50 tenure split as required by the revised policy. The policy is clearly consistent with the London Plan.</p> <p>The revised policy clarifies that affordable housing provided as part of Build to Rent schemes will not need to be managed by a registered provided when it is not feasible to include a separate residential core and/or block in the development proposal.</p>	No change to the Local Plan required as a result of this representation.
Greystar Europe Holdings Ltd,	GreystarEurope Holdings Ltd,	Nona Jones	Planner DP9	1155	Policy LP32	<p><b>See attachment for full representation</b></p> <p>Draft Local Plan LB Wandsworth's Draft Policy LP32 states:</p> <p>A. Development proposals for purpose built self-contained, private rented homes must:</p> <p>1.meet all criteria set out in emerging London Plan Policy H11;</p> <p>2.provide a mix of dwelling sizes that meets identified local and strategic housing needs, in accordance with Policy LP 26 (Housing Mix);</p> <p>3.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%); and</p> <p>4.provide high quality housing, in line with Policy LP 29 (Housing Standards).</p> <p>In conjunction with the above, Draft Policy LP26 (Housing Mix)sets out that the Council will require qualifying developments to be supported by evidence "proportionate to the nature and scale of development proposed" in order to justify the proposed mix. The nature of BtR developments typically means that evidence-based demand is largely focussed around one and two bed units as opposed to larger dwellings. As such, we would request that suitably worded supporting text is incorporated to reflect the level of flexibility</p>	<p>Build to Rent and Build for Sale are both types of self-contained housing, and thus there is no justification to include alternative housing mix targets specifically for Build to Rent Schemes. Nevertheless, policy LP26 (now LP24) does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites. This stance is reflected in the wording of the policy.</p> <p>The revised policy clarifies that affordable housing provided as part of Build to Rent schemes will not need to be managed by a registered provided when it is not feasible to include a separate residential core and/or block in the development proposal.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>required when assessing such proposals as part of an evidence-based approach for new residential development.</p> <p>In addition, we also note that limited clarification is provided in respect of affordable housing in BtR schemes. As set out in these representations, the principle of single management is a core component of Greystar's multi-family BtR model and ensuring cohesive operation of all units and ancillary functions throughout the building. To this end, Policy H11 of the Publication London Plan requires unified management of the private and Discount Market Rent (DMR) units in BtR schemes.</p> <p>On this basis, we would request that that Part 2 of Policy LP32 is amended to clarify that both private and affordable components should be operated under the same, single unified management as prescribed in the Publication London Plan. This could be secured on a Discount Market Rent (DMR) basis controlled by the corresponding rent levels as set out in the draft policy.</p>		
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1341	Policy LP32	We would like to know how the affordable housing provision affects the Build to Rent developments. (LP32)	This is set out in Policy LP32.	No change to the Local Plan required as a result of this representation.
Mr Ben Wrighton	Strategic Planning Director Watkin Jones Group	Sam Stackhouse	Associate Montagu Evans LLP	1263	Policy LP32	<p><b>See comment 1261 for attachment with full representation</b></p> <p>Whilst broadly supportive of this policy, our Client has the following observations on the following criteria:</p> <p><u>2) provide a mix of dwelling sizes that meets identified local and strategic housing needs, in accordance with Policy LP 26 (Housing Mix)</u></p> <p>We consider that this criterion is acceptable on the basis that Policy LP26 makes it clear that the borough's housing mix targets are indicative proportions and, as set out under Criterion B, as "planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new market homes to be provided." We therefore trust that the Council will consider this element of the policy flexibly when assessing BTR schemes which typically have an evidenced-based need for one and two bedroom dwellings and limited demand for larger dwellings.</p> <p><u>3) 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%)</u></p> <p>Whilst our Client is generally supportive of this criterion, we would recommend that clarification is provided so that it is clear that the on-site affordable housing could be operated under the same management as the market housing and secured on a Discount Market Rent (DMR) basis controlled by rent levels associated with London Affordable Rent and London Living Rent. In its current wording and when read alongside Part F of Policy LP25 (Affordable Housing) which states that the management of the affordable housing will be undertaken by a registered provider, it is not clear whether the affordable housing secured under a BTR scheme could be DMR under the same ownership and management as the market housing and not managed by a registered provider, or, what might be considered to be 'traditional' affordable housing i.e. separated from the market housing and managed by a registered housing provider.</p> <p>Our view, consistent with the Glossary of the NPPF, which states that landlords of BTR schemes do not need to be a registered provider, and the Publication London Plan, which states that BTR schemes should be under single management with affordable housing being DMR, is that the policy should made clear that the affordable housing sought by this criterion could be wholly</p>	<p>Build to Rent and Build for Sale are both types of self-contained housing, and thus there is no justification to include alternative housing mix targets specifically for Build to Rent Schemes. Nevertheless, policy LP26 (now LP24) does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites. This stance is reflected in the wording of the policy.</p> <p>The policy has been revised to align with the London Plan. Paragraph 4.11.10 of the London Plan states that the proportion of low-cost rent (Social Rent or London Affordable Rent) can be determined by the borough in line with policy H6. Policy H6 allows for a 50:50 tenure split as required by the revised policy. The policy is clearly consistent with the London Plan.</p> <p>The revised policy clarifies that affordable housing provided as part of Build to Rent schemes will not need to be managed by a registered provider when it is not feasible to include a separate residential core and/or block in the development proposal.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>DMR at the rent levels identified i.e. 50% London Affordable Rent and 50% Living Rent and not managed by a registered provider.</p> <p>Finally, whilst we have not expressly recommended a policy wording change as such, we suggest that further justification is provided by the Council in respect of how the proposed affordable tenure split has been derived and for consideration whether a blended approach would be more suitable that seeks a range of 'genuinely affordable rents' provided that they do not exceed a defined cap.</p> <p>Proposed Amendments to Policy LP32</p> <p>Our recommended amendments to Policy LP32 are set out below in red.</p> <p>LP32 Build to Rent</p> <p>Development proposals for purpose built self-contained, private rented homes must:</p> <ol style="list-style-type: none"> <li>1. meet all criteria set out in emerging London Plan Policy H11;</li> <li>2. provide a mix of dwelling sizes that meets identified local and strategic housing needs, in accordance with Policy LP 26 (Housing Mix);</li> <li>3. provide on-site <u>Discount Market Rent</u> affordable housing <u>under the same ownership as the private elements of the scheme</u> , in line with the threshold approach set out in the emerging London Plan. Subject to viability, the <u>rental levels</u> of the affordable housing delivered as part of the development will be required to be in line with London Affordable Rent (50%) and London Living Rent (50%) levels; and</li> <li>4. provide high quality housing, in line with Policy LP 29 (Housing Standards)</li> </ol>		
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1214	Policy LP32	<p>Policy LP32 Build to Rent</p> <p>"A. Development proposals for purpose built self-contained, private rented homes must should:</p> <ol style="list-style-type: none"> <li>1. meet all criteria set out in emerging London Plan Policy H11;</li> <li>2. provide a mix of dwelling sizes that meets identified local and strategic housing needs, in accordance with Policy LP 26 (Housing Mix);</li> <li>3. 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%); and</li> <li>4. provide high quality housing, in line with Policy LP 29 (Housing Standards)." <p>We welcome the Council's support for Build to Rent as a tenure, however, it is imperative that the provision of affordable housing and housing mix within this tenure is considered on a site by site basis, taking into account the factors set out in Part E of Policy LP26 whilst also acknowledging that Build-to-Rent schemes are best suited to smaller unit sizes (as confirmed in Para 4.31 of the GLA's SPG).</p> <p>It is also important that there is flexibility for some or all of the on-site affordable housing to be provided as Discounted Market Rent (DMR) where appropriate. The inclusion of DMR can enhance management efficiency and the overall viability and deliverability of Build-to Rent schemes. It also provides opportunities to meet a wider range of housing need (for example, including those who are unable to rent privately but are unlikely to be prioritised for Affordable</p> </li></ol>	<p>Build to Rent and Build for Sale are both types of self-contained housing, and thus there is no justification to include alternative housing mix targets specifically for Build to Rent Schemes. Nevertheless, policy LP26 (now LP24) does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites. This stance is reflected in the wording of the policy.</p> <p>The policy has been revised to align with the London Plan. Paragraph 4.11.10 of the London Plan states that the proportion of low-cost rent (Social Rent or London Affordable Rent) can be determined by the borough in line with policy H6. Policy H6 allows for a 50:50 tenure split as required by the revised policy. The policy is clearly consistent with the London Plan.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Rented or Living Rent housing)and to enhance equality and inclusiveness through integration.</p> <p>The inclusion of DMR in Build to Rent schemes accords with the National Planning Policy Framework, National Planning Practice Guidance, the Publication London Plan and the GLA's Affordable Housing SPG (the policies of which were developed following extensive consultation with the Build-to-Rent development and investment industry).</p> <p>Enabling some or all the affordable housing to be provided as Discounted Market Rent will not prejudice the ability for discounts to be set at a range of genuinely affordable levels, including those equivalent to London Living Rents. Policy should include flexibility for the range of discounts to be agreed on a site-by-site basis, taking into account the factors set out in Part E of Policy LP26. If a target tenure mix is prescribed in policy, this should reflect the widely accepted notion that Build to Rent is less viable than conventional sale due to its improved affordability and long-term maintenance/placemaking investment. In view of this, the Publication London Plan provides flexibility for the rental levels to be agreed provided at least 30% of homes have rents equivalent to (or lower than) London Living Rents. This approach should be considered in the Wandsworth Local Plan.</p> <p>As currently reflected, the affordable housing requirements set out in Draft Policy LP32 would have a larger financial cost than those required for higher value private sale by Policy LP26. The target level of affordable housing may, therefore, need to be reduced to ensure Build to Rent schemes can remain viable in delivery, unless greater flexibility is included for a site by site approach.</p>		
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1551	Policy LP32	<p><b>See attachment in representation 1534 for context</b></p> <p>Policy LP32 Build to Rent - OBJECT</p> <p>We are concerned that the requirements of Policy LP32 fail to conform with Policy H11 of the London Plan and impose onerous requirements on the delivery of Build to Rent housing. The tenure of the affordable housing required (London Affordable Rent (50%) and London Living Rent (50%)) exceeds the Fastrack Requirement of the London Plan (30% London Living Rent and 70% Discount Market Rent) and the approach has not been viability tested.</p> <p>3. provide on-site affordable housing, in line with the threshold approach set out in the emerging London Plan. <del>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%)</del></p> <p>L&amp;G do not consider that the tenure requirements for build to rent schemes should be the same for build to rent and for sale schemes recognising the differences in scheme viability and management of the homes. The New London Plan sets out the policy expectation for affordable housing to be provided as Discount Market Rent with at least 30% at London Living Rent levels, the policy as drafted by Wandsworth does not contain any reference to Discount Market Rent.</p> <p>The policy as drafted is more onerous for Build to Rent schemes to follow the Threshold Approach as 50% have to be provided London Living Rent levels vs for sale is 50% shared ownership. The viability testing of this tenure provision needs to be robustly evidenced and compared to the for-sale modelling to ensure the tenure mix requirements are financially viable and align with the New London Plan. The new Local Plan needs to be also clearer on management of affordable homes alongside B2R schemes given traditionally homes are sold to an RP, if homes are pepper potted they will likely be managed by the build to rent operator.</p>	<p>Build to Rent and Build for Sale are both types of self-contained housing, and thus there is no justification to include alternative housing mix targets specifically for Build to Rent Schemes. Nevertheless, policy LP26 (now LP24) does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites. This stance is reflected in the wording of the policy.</p> <p>The policy has been revised to align with the London Plan. Paragraph 4.11.10 of the London Plan states that the proportion of low-cost rent (Social Rent or London Affordable Rent) can be determined by the borough in line with policy H6. Policy H6 allows for a 50:50 tenure split as required by the revised policy. The policy is clearly consistent with the London Plan.</p> <p>The revised policy clarifies that affordable housing provided as part of Build to Rent schemes will not need to be managed by a registered provided when it is not feasible to include a separate residential core and/or block in the development proposal.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
DTZ Investors		Neil Wells	Quod	1512	Policy LP32	<p>Policy LP32 Build to Rent - OBJECT</p> <p>We are concerned that the requirements of Policy LP32 fail to conform with Policy H11 of the London Plan and impose onerous requirements on the delivery of Build to Rent housing. The tenure of the affordable housing required (London Affordable Rent (50%) and London Living Rent (50%)) exceeds the Fastrack Requirement of the London Plan (30% London Living Rent and 70% Discount Market Rent) and the approach has not been viability tested.</p> <p>3. provide on-site affordable housing, in line with the threshold approach set out in the emerging London Plan. <del>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%)</del></p> <p>DTZi do not consider that the tenure requirements for build to rent schemes should be the same for build to rent and for sale schemes recognising the differences in scheme viability and management of the homes. The New London Plan sets out the policy expectation for affordable housing to be provided as Discount Market Rent with at least 30% at London Living Rent levels, the policy as drafted by Wandsworth does not contain any reference to Discount Market Rent.</p> <p>The policy as drafted is more onerous for Build to Rent schemes to follow the Threshold Approach as 50% have to be provided London Living Rent levels vs for sale is 50% shared ownership. The viability testing of this tenure provision needs to be robustly evidenced and compared to the for-sale modelling to ensure the tenure mix requirements are financially viable and align with the New London Plan. The new Local Plan needs to be also clearer on management of affordable homes alongside B2R schemes given traditionally homes are sold to an RP, if homes are pepper potted they will likely be managed by the build to rent operator.</p>	<p>Build to Rent and Build for Sale are both types of self-contained housing, and thus there is no justification to include alternative housing mix targets specifically for Build to Rent Schemes. Nevertheless, policy LP26 (now LP24) does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that that schemes appropriately respond to the specific circumstances of sites. This stance is reflected in the wording of the policy.</p> <p>The policy has been revised to align with the London Plan. Paragraph 4.11.10 of the London Plan states that the proportion of low-cost rent (Social Rent or London Affordable Rent) can be determined by the borough in line with policy H6. Policy H6 allows for a 50:50 tenure split as required by the revised policy. The policy is clearly consistent with the London Plan.</p> <p>The revised policy clarifies that affordable housing provided as part of Build to Rent schemes will not need to be managed by a registered provider when it is not feasible to include a separate residential core and/or block in the development proposal.</p>	No change to the Local Plan required as a result of this representation.
	C B R E	Mr Will Lingard		417	Policy LP33	<p>As noted in the covering email by CBRE (dated 1.3.21), Nightingale Hammerson provides residential, nursing, dementia and palliative accommodation services within the Borough of Wandsworth and is regarded as a supported housing specialist. Any redevelopment plans for their land at 105 Nightingale Lane will be to ensure the charity can continue to sustainably carry on its vital essential services to the elderly within the community it serves. Sometimes however, a no net loss scenario will not be possible, for instance, where a site is constrained by heritage or capacity considerations. Whilst no net loss should be an ideal position, the circumstances of many sites coupled with the standard of existing accommodation when assessed against current best practice should be incorporated into the policy wording. This could be done by the amendment to paragraph A to "...The redevelopment of any site which includes specialist and supported housing is only <u>usually</u> considered acceptable where:". The policy is currently 'unsound' as it does not provide sufficient flexibility for development to reasonably come forward.</p>	<p>It is considered that a more flexible wording could undermine the intent of the policy, which seeks to resist the loss of various forms of specialist accommodation so that the level of provision in the borough is not reduced.</p>	No change to the Local Plan required as a result of this representation.
Mr Robert Arguile	Chair The Putney Society			404	Policy LP33	<p>A growing proportion of the local population over 65 (see para. 2.3) suggests a need for over 55 Sheltered Housing too. Room sizes for this need to be bigger to encourage downsizing.</p>	<p>The need for downsizing was considered as part of the Local Housing Needs Assessment. It is embedded in policy LP26.</p>	No change to the Local Plan required as a result of this representation.
Monica Tross	Sectary to planning committee Battersea Society			817	Policy LP33	<p><b>LP 33 Specialist Housing for Vulnerable People</b></p> <p>The HNA estimates that over-65s will rise from 9.6% to 12.1% of households in Wandsworth by 2037, and that households of over-75s will increase by 58%. It also shows a huge under-provision of specialist housing compared with the guidelines suggested by the Housing Learning and Improvement Network (LIN). The HNA suggests that adapting existing homes should be a priority for disabled people under 65. This is reflected at paragraph 17.68 in the new Plan, but it is not included in the policies set out here. We urge that it should be.</p>	<p>This falls outside the remit of the Local Plan. Additional support and adaptations can only generally be secured through the provision of new homes which are either accessible and adaptable or wheelchair accessible in accordance with Parts M4(2) and M4(3) of the Building Regulations.</p>	No change to the Local Plan required as a result of this representation.
Axis Construction		Joseph Hickling	Planner Boyer Planning Ltd	1220	Policy LP33	<p><b>See comment 1217 for attachment of full representation</b></p> <p><u>Draft Policy LP33 Specialist Housing for Vulnerable People</u></p>	<p>It is agreed that where proposals trigger part A of the policy, applicants should be required to demonstrate that there is no longer an identified need for the retention of the accommodation. Likewise, where proposals trigger part B of the policy, applicants should be required to demonstrate that there is an identified need for the proposed accommodation.</p>	<p>Parts A.1 and B.1, and supporting text of Policy LP33 (now LP31) amended to clarify that that evidence of need should be provided by applicants.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2.16It is welcomed that the draft Local Plan includes a specific policy to address the provision of specialist accommodation for older and vulnerable people. However, to improve the policy's effectiveness, we recommend that it be revised in a number of respects.2.17Part A1 of this draft policy states the following:</p> <p>"The redevelopment of any site which includes specialist and supported housing is only considered acceptable where: there is no longer an identified need for its retention in its current format"</p> <p>2.18In order to identify this need, on a site-by-site basis, it is recommended that applications proposing the redevelopment of care homes (or other forms of specialist accommodation), are required to be accompanied by 'needs assessments'. Such assessments would provide greater clarity regarding the need for, and provision of, specific types of accommodation locally.</p> <p>2.19By specifying that relevant applications must be supported by a needs assessment, it would then be possible to introduce greater flexibility within the wording of draft policy A1. Such flexibility would facilitate the change of use of existing care homes, to other forms of provision within the specialist and supported housing sector. In this context, it is therefore recommended that paragraph 17.70 of the supporting text is reworded as follows: "This policy seeks to resist the loss of various forms of specialist accommodation so that the level of provision in the borough is not reduced. However, the Council recognises the changing nature of care provision for older, vulnerable and homeless people. Where existing specialist accommodation does not meet modern standards or local need, the Council will support its re-provision or modernisation to ensure the tenure and provision of high quality specialist accommodation which better meets the needs of older, vulnerable and homeless residents."</p> <p>2.20For similar reasons, it is also recommended that part B1 of draft policy LP33 should be reworded. This is in order that it offers more flexibility and allows developers to undertake their own needs assessment, which would be informed by the Council's most up to date Local Housing Needs Assessment. Although it is recognised that an up to date LHNA forms part of the Draft Local Plan evidence base, bespoke needs assessments will have a greater capability to account for changing housing need throughout the plan period and also respond more effectively to site specific issues.</p> <p>2.21In addition, part B4 of policy LP33 states the following: "Proposals for the development of specialist and supported housing will be supported where the accommodation: includes provision of affordable units, in accordance with the emerging London Plan."</p> <p>2.22Policies H5and H13,of the emerging London Plan(if adopted) would require a minimum of 35% of new homes on private land across London to be delivered as affordable(part B1 of Policy H5).</p> <p>2.23There is a concern that this policy makes an assumption that all extra care/assisted living accommodation will be capable of providing affordable units. However, specialist older person's accommodation varies greatly, in terms of format and in respect of the level of care and ancillary support provided to residents. The commercial nature of specialist care developments is also different to standard C3 housing. The funding model of care facilities requires greater upfront costs to deliver on-site communal areas and other shared services, which can have significant implications on viability.</p> <p>2.24As such, it is suggested that draft policy B4,and its supporting text, should be revised in order that affordable housing is not required where proposed developments fall within Use Class C2 and where it is also demonstrated that the provision of affordable units would be incompatible, or otherwise unviable, because of the specific nature of the specialist accommodation envisaged.</p>	<p>Development proposals for all forms of specialist and supported housing will be required to provide affordable housing through the threshold approach. While the Wandsworth's Local Plan policy goes further than the London Plan, we note that the Greater London Authority have not raised any objections to this provision of policy LP33 (now LP31) in their representations on the Local Plan. Furthermore, the London Plan does not prevent local authorities from introducing additional requirements for the provision of affordable housing.</p>	

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2.25Part F of the emerging London Plan's draft policy H5 makes consideration for such scenarios through a 'Viability Tested Route'. It is recommended that Part B4 of draft policy LP33 makes reference to this.</p> <p>2.26It is therefore recommended that draft policy LP33 section B4 be reworded as follows: "includes provision of affordable units, subject to the outcome of a viability assess mentor where details of the operation of the proposed specialist accommodation would be demonstrably incompatible with the provision of affordable housing".</p> <p>2.27Draft Policy LP25(Affordable Housing) should also be reflective of the affordability targets set out in Policy H5 of the emerging London Plan. The threshold approach to applications should be included in the wording of the policy.</p>		
	Labour Group			651	Policy LP34	We welcome policy LP34 Gypsy and Traveller Accommodation which, among other things, commits to the safeguarding of the Trewint Street site. That said, we would draw attention to the current condition of the site which is in serious need of upgrading. There is also a need to monitor air quality at the site because of the proximity to nearby industrial uses.	Comment noted. This is not a matter for the Local Plan to address. The site continues to meet the need for Travellers.	No changes considered necessary for the Local Plan
Cllr. Paul White				971	Policy LP34	Larger pitches for growing traveller families, as well as temporary or "meanwhile" sites for "negotiated stopping" for mobile travellers should be arranged.	The Gypsy and Traveller Accommodation Needs Assessment (2019) indicates there is no requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough.	No change to the Local Plan required as a result of this representation.
Cllr Graeme Henderson and Cllr Rigby	Cllr Earlsfield Labour Party			927	Policy LP34	<p>Traveller's Site – Trewint St</p> <p>LP34 – p300</p> <p>Earlsfield is home to the only permanent Travellers site in the Borough. Parts of it are very badly run down e.g. the shower and toilet block. The site also suffers from noise and dust pollution from an adjacent industrial site (located in Weir Rd – LB Merton) and is now to be enclosed on the other side by a major new development. The Council should approach the traveller community to discuss, in depth, what is needed to render the site fit for the 21st century.</p>	Comment noted. This is not a matter for the Local Plan to address. The site continues to meet the need for Travellers.	No changes considered necessary for the Local Plan
Hassan Ahmed Hassan Ahmed	GLA			1100	Policy LP34	<p>Draft Plan policy LP34 sets out that there is currently one authorised Gypsy and Traveller site in the borough, located at Trewint Street, consisting of 11 pitches, and that the Council will safeguard this site to meet identified needs over the Plan period. Draft paragraph 17.74 indicates that there is no identified need for additional pitches over the plan period based on the findings of the council's recent Gypsy and Traveller Accommodation Needs Assessment (2019).</p> <p>It should be noted that as referenced in PLP paragraph 4.14.2 the Mayor will be initiating and leading a London-wide Gypsy and Traveller accommodation needs assessment, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation. Should additional need arise over the Plan period, the Mayor will be making funding available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multiborough basis, and for refurbishment of existing pitches identified via an audit of existing pitches (refer to PLP policy H14 paragraph 4.14.5).</p>	Comment noted.	No change to the Local Plan required as a result of this representation.
Dr Rosena Allin-Khan				1200	Policy LP34	<p>(iv) Trewint Street Travellers' Site: LP34 - p.300</p> <p>Tooting is home to the only permanent Travellers site in the Borough on Trewint Street, Earlsfield. I therefore welcome policy LP34 Gypsy and Traveller Accommodation which, among other things, commits to the safeguarding of the Trewint Street site.</p> <p>This site is, however, in need of upgrading and the site also suffers from noise and dust pollution from an adjacent industrial site (located in Weir Road – LB Merton). I hope that Wandsworth Council will seek to monitor the pollution levels for those living at Trewint Street.</p>	Comment noted. This is not a matter for the Local Plan to address. The site continues to meet the need for Travellers.	No changes considered necessary for the Local Plan

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Sectary to planning committee  Battersea Society			818	Policy LP35	<p><b>LP 35 Visitor Accommodation</b></p> <p>Airbnb and similar services are having profound and often damaging effects in parts of Battersea and other parts of the borough, and we are disappointed that this is not addressed in the Plan. It refers to the 90-day rule, but says nothing about how it is to be monitored or enforced. We believe that action is required to ensure that damage is not done to some communities over the next few years.</p> <p>As we note in our comments on Section 19, we have reservations about the policies set out here with regard to the location of hotels and hostels.</p>	This is not a planning policy matter. Unlawful conversions will be subject to enforcement action.	No changes considered necessary for the Local Plan
Cllr. Paul White				657	Policy LP35	<p>"Air B n B" hotel type listings of residential homes can remove properties from potentially</p> <p>being offered as private rented accommodation and excessive offering in this manner must</p> <p>not be encouraged, with stricter enforcement and use of court action where limitations are breached.</p>	Comment noted.	No changes considered necessary for the Local Plan
AJDK	AJDK	Katie Gwilliam	Planner Rolfe Judd Planning	1057	Policy LP35	<p>See comment 1055 for attachment with full response</p> <p>Policy LP35 (Visitor Accommodation)</p> <p>The Client has a long-term interest in the site which is currently in hotel use(Class C1).However since the Covid-19 pandemic began at the start of 2020 and the Government's lockdown measures were introduced in March 2020 the hospitality industry across the UK has suffered irreversible and significant economic damage due to unforeseen immediate closures. To-date the impact of Covid-19 has left the hospitality industry across the UK experiencing long-term vacancies, with no clear indication of how hotel and other serviced accommodation businesses can overcome these financially difficult times and be viable land uses in future.</p> <p>Our Client concurs with the Council's aims that visitor accommodation should be supported within town centre locations, however given the current circumstances surrounding the Covid-19 pandemic; it is considered that Draft Policy LP35unreasonably restricts the change of use of existing hotels to other viable land uses. This Draft Policy needs to adopt a more flexible approach to existing hotel uses (Class C1) so to avoid any periods of long-term vacancy and uncertainty, effectively allowing them to adapt to future market trends.</p> <p>Below, we set out the current wording of Policy LP35 and our Client's response.</p> <ol style="list-style-type: none"> <li>1. Proposals involving the development, redevelopment and/or intensification of visitor accommodation will be supported 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).</li> <li>2. Proposals which result in the net loss of bed spaces will be resisted unless appropriate marketing evidence demonstrates that there is no longer a demand for the visitor accommodation</li> <li>3. All proposals involving visitor accommodation must fully address the following requirements:</li> <li>4. The scale of the proposal would be proportionate to its location and its function.</li> <li>5. It would not result in an over-concentration of visitor accommodation at the neighbourhood level.</li> <li>6. It would be inclusive and accessible, in line with Policy E10 of the emerging London Plan.</li> </ol>	The London Plan identifies a target for the provision of an additional 58,000 bedrooms of serviced accommodation by 2041, with a focus on both leisure and business visitors. This policy therefore seeks to both promote the provision of new visitor accommodation in appropriate locations and resist the loss of existing visitor accommodation where it continues to meet an identified demand. The policy position is consistent with the London Plan which states that 'a sufficient supply and range of serviced accommodation should be maintained'. The revised policy is more flexible as it also allows for the net loss of bed spaces where the proposed development is in a predominantly residential area and would re-instate an original residential use, or where the existing use has significant negative effects on residential amenity. It is agreed that marketing evidence might not always be necessary to demonstrate that there is no longer demand for existing visitor accommodation.	Policy LP35 (now LP46) amended to clarify that it is not necessary to submit marketing evidence in order to demonstrate that there is no longer a demand for the visitor accommodation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>7. It would not significantly compromise the supply of land for new homes on either allocated housing sites or sites capable of providing new homes and the Council's ability to meet its housing requirement.</p> <p>8. It would provide ancillary facilities which are open for public use and create employment opportunities for local residents including restaurants, gyms and conference facilities.</p> <p>9. It would be managed appropriately as short-term accommodation, with stays not exceeding 90 consecutive days.</p> <p>Our Client agrees with the wording of Parts A and C of Draft Policy LP35, as the general principles of supporting visitor accommodation and the criteria that should be addressed in any development proposal is appropriate.</p> <p>However, our client objects to the wording of Part B which introduces protection to visitor accommodation.</p> <p>Firstly, the wording of 'Part B' does not give a clear indication of what 'appropriate marketing evidence' consists of and does not state a minimum marketing period that would be sufficient enough for the Council to even consider the marketing as a whole, as 'appropriate'. This lack of vital detail is particularly important when an application may solely rely on the marketing evidence, and undergoes rigorous assessment by the Council. Therefore, the current wording of the Draft Policy LP35 is unclear and lacks any practical guidance.</p> <p>Secondly, the introduction of marketing evidence always places an unnecessary delay on redevelopment opportunities which increasingly impacts on viability.</p> <p>The supporting text to this policy makes reference to the 'emerging London Plan' and the identified target of 58,000 bedrooms of serviced accommodation across London by 2041. This target figure is derived from the GLA's Working Paper 88 (April 2017) for 'Projections of demand and supply for visitor accommodation in London to 2050'. The Working Paper provides details on the supply of 'serviced accommodation' (i.e. hotels, b&amp;bs, guest houses, hostels) which is understood to be largely concentrated in the central boroughs, such as Westminster, Camden and Kensington and Chelsea.</p> <p>Under Table 20 'Projected net additions of supply by borough to 2041, London' of this Working Paper, it is anticipated that Wandsworth will supply around 760 new hotel rooms (accounts for only 1.2% share of the supply in London), with 'the majority of new hotel rooms [...] anticipated to be delivered in inner London Boroughs and out near Heathrow Airport, with Westminster, Tower Hamlets, Hillingdon and Hounslow set to bring in the most hotel rooms into the supply'.</p> <p>In summary, Westminster is expected to deliver 6,136 new hotel rooms (accounts for 9.6% share of the supply in London), 5,693 in Tower Hamlets (8.9%), Hillingdon providing 5,461 (8.5%) and 4,926 in Hounslow (7.7%). Overall, it is anticipated that the delivery of hotel room supply will be higher than the GLA target figure of 58,000.</p> <p>Upon review of this Working Paper, Wandsworth is anticipated to only deliver a small share of hotel rooms between the periods of 2015 - 2041 in comparison to other London Boroughs, as demonstrated by the figures above. The Council's position to resist the loss of hotel uses (Class C1) and place existing hotels under strong protection through the requirement of 'appropriate marketing evidence' is unsubstantiated given the small share of 1.2% the borough is anticipated to supply up to 2041.</p> <p>Additionally, the Policy lacks consistency with the Mayor's approach towards visitor accommodation. Whilst the Publication London Plan (2020), notably Policy E10 on 'Visitor Infrastructure', encourages a sufficient supply of visitor</p>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>accommodation to be maintained, there is no requirement at the strategic level for new development proposals to demonstrate that 'appropriate marketing evidence' should be undertaken to justify any loss of hotel use.</p> <p>Therefore our Client objects to the restrictive approach Part B of Draft Policy LP35 places on existing hotel uses, and instead the Council should adopt a flexible approach on existing hotels to allow for other potential and more viable town centre uses to come forward without the requirement of 'appropriate marketing evidence'. This will ensure the continued vitality of town centres.</p> <p>At the National Level, the NPPF (2019) also addresses this, and aims to ensure the vitality of town centres under Paragraph 85. It states:</p> <p>'Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation', therefore, planning policies should promote town centres 'long-term vitality and viability –by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries'.</p> <p>This further strengthens our Client's position that the current wording of Draft Policy LP35 strongly restricts how landowners, developers and other key stakeholders can future-proof buildings and fundamentally adapt them in the event that the existing land use is no longer economically viable. The Draft Policy does not provide buildings with any flexibility to adapt efficiently in future and the requirement of marketing evidence will potentially prolong vacancy periods, and in-turn undermine the vitality and viability of properties located in a town centre. Therefore, it is considered that Part B of Pre-Publication Policy LP35 is not consistent with the Publication London Plan (2020) and the NPPF (2019) to ensure the vitality of Wandsworth's Town Centres.</p>		
Robert East	Senior Planning Policy Officer LB Lambeth			1592	Policy LP35	<p>LP35 Visitor Accommodation</p> <ol style="list-style-type: none"> <li>Proposals involving the development, redevelopment and/or intensification of visitor accommodation will be supported 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).</li> </ol> <p>London plan policy E10 clearly outlines where strategically-important serviced accommodation should be promoted and where smaller-scale provision is appropriate. DRLLP policy ED14 aligns with this approach. Lambeth is concerned that policy LP35 may result in visitor accommodation being permitted outside of the CAZ and outside of town centres (which would be contrary to London Plan policy E10 G). Such developments in these locations could impact on neighbouring residential amenity.</p> <p>In accordance with London Plan policy E10, LP35 should make clear that within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods and subject to the impact on office space and other strategic functions. Outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London. Lambeth would also like to know how Wandsworth has had regard to DRLLP policy ED14 section b).</p> <p>Lambeth would like to ensure that there is a consistent policy approach to additional visitor accommodation across the whole of Vauxhall.</p>	Agreed. The policy has been revised to align with the London Plan and the Lambeth's approach to visitor accommodation in CAZ.	Amend policy LP35 to align with the London Plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			395	Table 17.3	Where does the figure of just 6 new homes in Putney for 2028/33 come from?	The Putney's housing capacity was informed by the Housing and Economic Land Availability Assessment.	No change to the Local Plan required as a result of this representation.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1338	Table 17.3	- It should be recognised that COVID-19 may cause a reduction in housing demand within Wandsworth.	The long-term effects of the COVID-19 pandemic on housing market remain unknown. The borough's housing capacity was informed by the Housing and Economic Land Availability Assessment.	No change to the Local Plan required as a result of this representation.

## Chapter 18 - Building a Strong Economy

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			332	General Building a Strong Economy Comment	Good to see two office buildings in Putney (Princeton Court & Carlson Court) on the protected map, and a couple more EUPAs in para 18.59, but there are many more that should be here, particularly along the Upper Richmond Road, Jubilee House etc. The current Local Plan completely failed to protect the offices Putney used to have despite this being included in Policies. <u>Please try a lot harder</u>	<p>Comments noted, including the support for the two additional EUPA designations (which replaces the EPA designation within the adopted Local Plan). The designation seeks to protect established office premises that provide a substantial amount of floorspace for local businesses and which are located outside of preferential locations identified in the NPPF (i.e. town and local centres). The imposition of policy protection must therefore be subject to robust evidence, and the inclusion of the two additional EUPAs is based on the identification of their suitability within the Employment Land and Premises Study (2020). The reasoning for their inclusion is set out within paragraphs 18.61 and 18.62 of the Regulation 18 Local Plan.</p> <p>In accordance with the NPPF and the London Plan, Policy LP 36 (Promoting and Protecting Offices), town and local centres are identified as the primary location for new office development, and Part E specifies that the loss of existing offices will not be permitted unless certain criteria are met: there is no net loss of the economic floorspace as a result of the redevelopment or robust evidence has been presented to demonstrate that there is no market demand. The Putney Town Centre boundary extends along the Upper Richmond Road both east and west, to East Putney station and Estate House, respectively, and also includes Jubilee House. The latter is also covered by a site allocation, PUT 2 Jubilee House and Cinema, which requires that "all existing office floorspace should be re-provided and enhanced, with the latter incorporating affordable workspace". Policy protection for the office uses therefore extends to these sites. It is noted that the introduction by the Government of new permitted development rights allowing the change of use from E Class to C3 (dwellinghouse) has the potential to undermine this long-standing policy position, and the Council is considering taking forward an Article 4 Direction to limit this right in certain locations.</p>	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee Battersea Society			819	General Building a Strong Economy Comment	<p><b>18: BUILDING A STRONG ECONOMY</b></p> <p><b>Introduction.</b> We consider that the implications of office and industrial development are inadequately covered: overall there is a lack of recognition of traffic, public transport and general access and servicing implications both for those working on sites and deliveries/ visitors. The needs of disabled workers needing parking are woefully neglected.</p>	Requirements for parking provision are set out within Policy LP 53 (Parking, Servicing and Car-Free Development), and are consistent with standards set out in the recently published London Plan. The policy includes requirements for both parking standard for offices and for disability-friendly car parking spaces. Policy LP 36 (Promoting and Protecting Offices) outlines preference for new office development within town centres (and local centres where of an appropriate scale) on the basis of the high public transportation accessibility of these locations. The impact of individual applications would furthermore be assessed as part of the submission of planning applications.	No changes to the Local Plan are considered necessary.
Spencer Barnshaw	Secretary Battersea and Wandsworth Trades Union Council			1149	General Building a Strong Economy Comment	<p>Supporting a green economy (Actions 148 – 158)</p> <p>These 11 actions, although welcome, do not represent a comprehensive job creation and skills strategy.</p> <p>There is less than a page on the issue of Local employment and training opportunities in LP42 (Pages 329-330)</p> <p>'The use of local suppliers supports the maintenance of a sustainable local economy by providing further employment opportunities for local labour' (18.92).</p> <p>Data is needed on whether this is working in practice. For example:</p> <p>Supply chains</p> <p>How successful has the application of Section 106 been in supporting local businesses?</p> <p>What percentage of the value of major developments has been won by local supply chain employers?</p>	<p>Comments noted, and where appropriate have been passed on to the WESS team and the Economic Development Office (EDO).</p> <p>LP 42 Local Employment and Training Opportunities is a new policy, however it takes forward an existing policy approach to this topic. The approach is considered successful, with the programme nearing the 1000th local job since the EDO started collecting in this way. Less data is available regarding the impact on local supply chains, however this is a newer requirement. Monitoring data is collected and considered by the EDO and Work Match.</p> <p>The London Plan forms part of the borough's Development Plan, and therefore requirements set out within it will be used to inform decisions on planning applications, including those relating to employment, skills development, apprenticeships and other education and training opportunities. Further information on how the borough collects contributions, via S106 agreements, is also included in the recently updated Planning Obligations SPD (2020).</p> <p>Recommendations regarding the Green Homes Grant and the creation of a Green Economy Commission are noted, however this exceeds the function of planning policy (and of the Local Plan). For information, the GLA London Recovery Programme, focused on recovery from the Coronavirus pandemic, includes a 'Green New Deal' as one of its 11 missions, however this is yet to be distilled in planning policy function.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Jobs</p> <p>How successful has the application of Section 106 been in recruiting local residents into employment?</p> <p>What percentage of the labour force has been recruited locally in the major developments in the borough in the last 10 years?</p> <p>The need for a co-ordinated public sector led approach</p> <p>The experience of the Green Homes Grant in 2020-21 highlights the need for a long-term strategy centred on local authority leadership. The failures of the American private sector company, ICF, to manage the scheme effectively and the decision by the Government to withdraw £1 billion of funding has been a major setback to a green recovery. The impact of the pandemic has been a factor but there needs to be a public process of assessing how the LB Wandsworth component of the grant funding was delivered and the lessons to be learnt.</p> <p>Putting a green jobs and skills strategy at the heart of local economic recovery</p> <p>The Local Government Association has highlighted the importance of this.</p> <p>'Twenty employment and skills funding streams are managed by eight departments or agencies, spending more than £10 billion a year. Despite this investment, they often fail to meet local need, address economic and social challenges, or make a decisive impact on outcomes. An integrated and devolved approach to skills could have huge benefits. For a medium-sized combined authority each year this could lead to an additional 8,500 people leaving benefits and 5,700 people increasing their qualification levels, with additional local fiscal benefits of £280 million per year and £420 million to the economy.</p> <p>We need strong, visible, joined-up democratic and accountable leadership nationally and locally to address these issues, and we need a strategy in place now.' Re-thinking local: skills and the green economy   Local Government Association</p> <p>Addressing the requirements of the London Plan</p> <p>Wandsworth will also need to implement the skills component of the London Plan. This can be summarised as:</p> <ul style="list-style-type: none"> <li>• The Mayor will work with strategic partners to address low pay and gender and ethnicity pay gaps and coordinate national, regional, and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.</li> <li>• Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations. Boroughs should ensure these are implemented in ways that:             <ol style="list-style-type: none"> <li>1. enable those people undertaking training to complete their training and apprenticeships</li> <li>2. ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created</li> <li>3. increase the proportion of under-represented groups within the construction industry workforce.</li> </ol> </li> </ul> <p>Recommendation - Create a Green Economy Commission</p>		



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>This should be set up in consultation with local stakeholders to establish:</p> <ol style="list-style-type: none"> <li>1. a) Membership</li> <li>2. b) Terms of reference</li> <li>3. c) Operational guidelines</li> </ol> <p>BWTUC's view is that this should include Council Officers, Local businesses including the Chamber of Commerce, Education bodies, Trade unions, and representatives of community organisations. It should map out a strategy for delivering green skills and jobs between 2021 -2030. There should be a focus on Wandsworth, but close liaison will need to be established with neighbouring boroughs and the GLA.</p> <p>The main function will be to align the skills needed in the borough by way of apprenticeships, secondary education, adult education, and traineeships with growth areas in the green economy. Schools, Further and Higher Education institutions and other providers will then be able to plan with some degree of confidence their course offers. This forum will be well placed to synchronise with the opportunities for funding presented by the Skills for Jobs White Paper and promote the lifelong learning guarantees to upskill the current and future workforce.</p> <p>The type of ad hoc liaison implied in the WESS Green Economy actions will be insufficient to develop a co-ordinated strategy. Regional and local authorities across the UK are increasingly establishing strategic partnership bodies to oversee this work and the Local Plan needs to reflect this.</p>		
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1343	General Building a Strong Economy Comment	We would like to make the following suggestion: - The shift from office to industrial use (e.g. online retail and food delivery) that is likely to occur due to COVID-19 be considered in the plan.	Policy LP 38 (Mixed Use Development on Economic Land) specifies that the redevelopment of office uses to industrial uses is appropriate as part of the required re-provision of economic land within Economic Use Intensification Areas. It should be clarified that this is also acceptable in Economic Use Protection Areas.	Amend Policy LP 38.A.2 to clarify that the replacement of office floorspace with industrial floorspace, as part of the requirements of the designation, would be acceptable.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1344	18.2	We would like clarity on the following: - How the intensification of existing industrial areas will make up for the predicted reduction (6.2 Hectares) in land available for industry?	The Local Plan acknowledges the requirement for additional industrial land, and incorporates policies intended to protect existing industrial land and to intensify industrial uses where appropriate as part of a plan-led approach on existing sites. In particular, the draft local plan promotes industrial intensification within the Battersea Design and Technology Quarter (BDTQ) and within the draft masterplan for the Wandle Delta area. Further information regarding how the borough anticipates to meet the identified demand for industrial uses (identified to be 35,700 sqm for core industrial uses, or a land-equivalent of 5.5ha) is set out within the Borough's Housing and Economic Land Availability Assessment (HELAA). A first draft was published alongside the Regulation 18 Local Plan, and an updated version will be published alongside the next draft, the Regulation 19 version ('Publication' version).	No changes required.
Mr Robert Arguile	Chair The Putney Society			334	18.24	Will the Article 4 Direction be updated?	Since the draft Local Plan was published, the Government have introduced further changes to Permitted Development Rights enabling the change of use from E Class to C3 will undermine this strategy (subject to certain limited prior approval criteria). The Council are considering proposals to take forward an Article 4 Direction to limit the extent of this PDR with respect to office uses, which now fall under Class E. It is noted, however, that the Government have consulted on proposed amendments in the NPPF for the use of Article 4 Directions, which would - if taken forward - seek to place greater restrictions on their implementation.	No changes to the Local Plan are considered necessary.
Mr Joe Palmer	Chief Executive AFC Wimbledon			1289	18.34	<p>Please see attachment for further details</p> <p>We fully endorse having local businesses on our doorstep and plan to engage with existing and new businesses as we become settled in our new home. However, given existing business uses include trade counters, arts studios, catering, film, and creative studios, is the SIL designation appropriate for this location? We are aware that The Garratt Business Park has successfully adopted Business Improvement District status over the last 15 + years. We note from their website: "Garratt Business Park is a thriving community of around 60 small and medium size businesses offering a wide range of goods and services. We also provide one of London's most exciting hubs for artists and makers in the form of Wimbledon Art Studios and Delta House Studios." - A SIL</p>	The Council's adopted Local Plan designates the Summerstown industrial area as a Locally Significant Industrial Area (LSIA), a designation which permits (and indeed has enabled) the location of the types of contemporary businesses uses that are found in the LSIA. The designation of the site as a Strategic Industrial Location (SIL) is consistent with the recently adopted London Plan, and is based on an assessment undertaken for the Wandsworth Employment Land and Premises Study (2020), which found it suitable. The SIL designation would welcome (and certainly not preclude) the types of businesses identified within this representation, including trade counters, arts studios, catering, film and creative studios. The designation, rather, seeks to protect land within the borough for these types of uses, which can often be put under pressures to redevelop into higher value uses (such as residential) without suitable protection through policy. The Council therefore share the vision set forward in this representation for the	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>designation might hinder inward investment and could limit contemporary business and job growth. Post Covid 19 to support business hit by the pandemic maintaining some flexibility will be required in this location. ·Will limit the potential of your place making agenda for the Wandle Valley: "12 Area Strategy for the Wandle Valley" and "PM10 The Wandle Valley".At this time of fundamental change in industry and business, we believe policy should adopt a more flexible designation that would support business growth and jobs. With our new stadium and the spaces, we currently have and will have in the future, we are potentially a significant asset that can help strengthen the Garratt Business Park as a business location. There is the potential of contemporary business space, (3D manufacturing, other new manufacturing methods), plus the green, creative and innovation economy, delivering more jobs in a reimagined live, work, play, study, visit neighbourhood. This is something that we will be keen to investigate with Wandsworth, Merton, GLA and of course local businesses and people.</p> <p>Plough Lane Stadium, Plough Lane, London, SW17 0NR E: info@afcwimbledon.co.uk Website: www.afcwimbledon.co.uk Registered in England No. 4458490. Vat No: GB834 8734 00 A bigger opportunity to position this part of south west London. We consider the Draft New Local Plan is currently missing an opportunity of leveraging the investment made by ourselves and others to strengthen and elevate the wider area. We have separately written to the leader and Mayor of London in this regard. There is an exciting opportunity to set out a compelling vision, placemaking and growth strategy for our Stadium District, that draws in the Garratt Business Park and other adjacent areas. Elsewhere in London at the Olympic Park, Arsenal and the Emirates Stadium, the new Spurs Stadium, Brentford's new stadium in Hounslow and the O2 in Greenwich it appears lots of work has and is being done to ensure their investments help to deliver positive wider area urban regeneration. Conclusion. We believe there is an exciting opportunity to work with the surrounding area and its heritage to reimagine, create and maintain a mixed use neighbourhood where people live, work, study and play that will generate long term benefits for all. Working with Merton, Wandsworth and the GLA we would be supportive of an approach that sets out a vision for the Stadium District in which our stadium is a good "urban fit", that leverages the catalyst investment already made so optimising benefits for the local community.</p>	future of the Garratt Business Park, and would welcome engagement from AFC Wimbledon with our Economic Development Office to understand how the organisation could support existing and nurture new businesses in the area.	
Monica Tross	Sectary to planning committee Battersea Society			822	18.41	<b>18.41 forward: Battersea Design and Technology Quarter (BDTQ):</b> There should be reference to linkage between potential activity here with that in RCA Quarter/Ransomes Dock (Vivienne Westwood) Focal Point through complementary research and development functions.	The reference within this paragraph to the 'existing creative economy' covers such activity, which covers a range of institutions and organisations. This is explicitly drawn out within the BDTQ EADF (see the Executive Summary), however this level of detail is not considered necessary for the Local Plan. The sentence should be amended to refer to 'creative and design economy'.	Amend paragraph to include reference to the design economy.
Dr David Curran	Lavender Hill for Me			1171	18.41	<p>LP37 Managing Land for Industry and Distribution(Local Plan page 311)</p> <p>18.41 -Battersea Design and Technology Quarter (BDTQ): Strongly support these proposals. Clearly advantageous for a more strategic approach to be taken to this large land area, which contains valuable industrial uses but which is also ripe for intensification. Note we have made a proposal in the part of our response addressing the site allocations regarding the boundary of this areas (suggesting that the whole, rather than part, of the London Concrete site be included) that we do not repeat here. The We Made This study is comprehensive and well considered. The proposals regarding intensified industrial uses, and mixed industrial / office uses (18.44-18.46) are sensible and should allow these sites to generate a commercial return to landlords that is commensurate with their increasingly well-connected location, while at the same time ensuring that the important industrial uses are not simply displaced outside the Borough; in this regard Wandsworth could be quite innovative in illustrating how intensification of use does not necessarily need to entail the wholesale destruction of previous industrial uses. Support the proposal in 18.48 that this site is not suitable for residential uses of any kind: for this site to work and deliver the employment and economic benefits it is capable of, it must not be swamped by the inevitable residential development pressure that is otherwise likely to arise.</p>	Support noted.	No changes required (comments regarding the London Concrete site are considered in response to another comment).
Covent Garden		Mr Philip	Consultant	1093	18.53	CGMA welcome the policies that protect and support NCGM and allow flexibility for uses on the market in the future.	Support noted. The Council shares that ambition to develop a foodhub and an emerging food and horticultural quarter around the New Covent Garden Market.	Add references to the Council's support for an emerging foodhub and potential food and

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Market Authority		Robin	Jones Lang Lasalle			<p>CGMA supports Policy LP37 that protects the primary function of New Covent Garden Market, and the associated railway arches as a wholesale retail facility.</p> <p>The principle of the consolidation and reconfiguration of NCGM is supported. This will facilitate NCGM adapting to future changing circumstances.</p> <p>However, CGMA requests additional explanatory text is added to Policy LP37 at paragraph 18.53 to recognise the potential for NCGM to develop into a foodhub for London and the beneficial effect this would have for the Nine Elms area. This will include the growth in food related activities as the food quarter is established, such as restaurants, incubator units and a food education unit.</p>	Policy LP 37 is concerned, primarily, with uses related to industrial activities (as defined as in that policy), and therefore this aspiration should be recorded in the Nine Elms Area Strategy, which takes a broader view of the transformation of this area. A reference to the foodhub potential is appropriate in paragraph 18.53.	horticultural quarter in Nine Elms to the Nine Elms Area Strategy and Policy PM 3.  Amend paragraph 18.53 to include a reference to the potential for a foodhub, and to rationalise the sentence for clarity.
Mr Gavin Chandler				510	18.59	<p>The council appears to be permitting development of the Irene House, 218 Balham High Road, EUPA as a residential development. This goes against this plan, previous Local Plans (where it was listed as an EPA) and the GPDO Article 4 Direction raised by WBC, initially in May 2017.</p> <p>Without limitation, this goes against items 2.11, 2.76, 2.77, 3.11, 3.12, 10.4, 10.9, 10.11, 18.16, 18.17, 18.22, 18.24, 18.58 and 18.59 of this Plan, along with policies LP36, LP38, LP41, LP42, PM8 and the contents of table 3.1.</p> <p>All of those, and this plan in general regarding promoting local economy, are well reasoned points. The Council should reinforce them or detail how Balham town centre will recover this employment opportunity area if it has somehow been lost.</p> <p>Either way, in order to give strength to the points in this Plan, serious questions need to be asked about how an area can be so clearly important to a town centre's employment opportunities, be identified as such and yet still be permitted for development against the Council's wishes.</p>	The consent relating to Irene House was secured via prior approval for permitted development. While the development proposal is inconsistent with the approach taken in this Local Plan (and indeed the adopted Local Plan), the GPDO (General Permitted Development Order) requires the Council to make a determination on a prior approval application within 56 days of receiving the application or otherwise permission is automatically granted. This 56 day expiry date fell before the Article 4 Direction came into force and therefore the Council had no choice but to make a determination under the GDPO. The GDPO sets out the criteria under which the application must be assessed, which unfortunately does not include loss of employment floorspace.	No changes required.
Dr David Curran	Lavender Hill for Me			1172	18.59	<p>LP38 Mixed Use Development on Economic Land(Local Plan page 311 &amp; Policy Map)</p> <ul style="list-style-type: none"> <li>Generally support the proposed policies on protection and retention of EUPAs, including the preference for office space in cases where industrial use no longer experiences sufficient demand.</li> <li>59 -Battersea Business Centre at 99-109 Lavender Hill—agree that this should be designated as an EUPA, noting that this is an important local economic zone with substantial employment, and that through the provision of affordable office and studio space this is a driver of the local arts and creative sector.</li> <li>59 -Propose that 83-97 Lavender Hill(odd; ground floors), which are all adjacent to / backing on the business centre, should also be designated as the Battersea Business Centre EUPA given these ground floors are to some extent contiguous with the Business Centre, and are also to some extent in common ownership, and are increasingly converting to business uses that are complementary to the Business centre. 87 Lavender Hill in particular currently consists of high quality flexible office space, with plans to link it through to the Business Centre at the rear to create a larger office unit with some scope for short term accommodation. There have been several proposals for redevelopment of the backlands and some of the retail units to better use this space, and enhance the overall offer of the business Centre, and EUPA designation will both recognise this and support this process. We note that 103a-103g Lavender Hill (the similarly linked retail units on the other side of the entrance of the Business Centre) are technically encompassed within the EUPA designation (which we support), and that they have a variety of retail and business uses complementary to the Business Centre (and we understand that they are also within common ownership of the Business Centre).</li> </ul>	<p>General support for the policy position is noted, as well as the inclusion of the Battersea Business Centre at 99-109 Lavender Hill and 124 Latchmere Road and 187-207 Lavender Hill.</p> <p>The parade of shops at 83-97 Lavender Hill are considered to be distinct from the Battersea Business Centre, although comments on the conversion of these uses to office floorspace is noted and has been verified through a site visit. The current policy approach would present these are suitable locations for office development as an 'edge-of-centre' site (established within the policy as having equivalent preference to the EUPA designation), and amendments to the boundary are therefore not considered necessary.</p> <p>Mortimer House at 230-236 Lavender Hill, 255/255A Lavender Hill, 168 Lavender Hill, and 64-66 Attenburg Gardens are all located within the Clapham Junction Town Centre boundary. In such locations, office provision is protected (see Policy LP 36.E), and as such further designation as an EUPA is not necessary. It is not considered appropriate to include the BT Telephone Exchange (60-62 Attenburg Gardens) as an EUPA as the site is not currently in office use.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>59 -124 Latchmere Road and 187-207 Lavender Hill–agree that these two premises should be designated as an EUPA. We note that there is a rather larger cluster of office buildings in this location, and suggest that several others merit inclusion as EUPAs, given that collectively they accommodate a significant number of typically very small and startup businesses at generally 'affordable' rent levels -and contribute significantly to the economic vitality of the Clapham Junction town centre, by providing a business service that is not readily available elsewhere and which is to some extent under threat due to residential development pressures. The following, in particular, are all within a small distance of other and merit serious consideration for inclusion within this cluster: <ul style="list-style-type: none"> <li>We propose that Mortimer House at 230-236 Lavender Hill be added to this cluster as an EUPA employment use. This is a wholly office use building (with retail at ground level), and provides economic office space for a number of local businesses.</li> <li>We propose that 255 / 255A Lavender Hill be added to this cluster as an EUPA employment use. This building is wholly in business use, and accommodates a mixture of dentistry and other health practitioner businesses on the upper levels.</li> <li>We propose that 60-66 Altenburg Gardens(three separate buildings immediately south of Lavender Hill) be added to this cluster as an EUPA employment use. 60-62 Altenburg Gardens is a BT building and currently principally in use as an operational telephone exchange, but has been partly marketed for conversion to wider business use. 64 Altenburg Gardens is a relatively large commercial building currently in use by the Share Community. 66 Altenburg Gardens is a brand new building providing 2,704 sq.ft. of high quality open plan commercial space over three storeys.</li> </ul> </li> </ul> <p>We propose that Shakespeare House at 168Lavender Hill be added to this cluster as an EUPA employment use: it is a large building that is wholly in use as a business centre providing flexible workspace</p>		
Dr David Curran	Lavender Hill for Me			1173	18.71	<p>LP39 Railway Arches</p> <p>18.71 -Only (very minor) comment is that we support the enabling of change of use of railway arches to non economic uses where it improves access -for example, to allow new connections in and around the Queenstown Road / Stewarts Lane site –as the uninterrupted row of occupied arches stretching north from Wandsworth Road are a key barrier that arguably holds back the optimal economic development of the area.</p>	Support noted.	No changes required.
Dr David Curran	Lavender Hill for Me			1176	18.89	<p>18.89 –we note that the Battersea Business Centre at 99-109 Lavender Hill is another location that currently provides economical workshop spaces for the cultural industries, which we agree is important to the Borough but increasingly at risk of being squeezed out by development pressures -and suggest it be recognised as such while where possible enabling the continued optimisation of the use and layout of the site.</p>	Comment noted. The various areas identified within paragraph 18.89 are in reference to where the Council has provided additional cultural guidance, however the importance of Battersea Business Centre is recognised within the new Arts and Cultural Strategy for the borough as a whole.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			333	Policy LP36	<p>LP36.B We support new offices in town centres, particularly Putney. Local businesses need space in local parades too, but are likely to be in shop units.</p> <p>LP36.C Agreed</p> <p>LP36.E The current Local Plan said the existing space along the Upper Richmond Road would be protected, but the Council has allowed too high a proportion to be lost.</p> <p>LP36.E.2 If it won't let, it probably need refurbishment. That there is very little space available even in lockdown shows that too much has been lost in recent years. This get out should be removed given that the plan foresees increasing demand long term.</p>	<p>Support and comments noted, including on the scale of loss in Putney. The policy approach put forward in the Local Plan seeks to prevent the further loss of existing office stock. It is noted that the introduction by the Government of new permitted development rights allowing the change of use from E Class to C3 (dwellinghouse) has the potential to undermine this long-standing policy position, and the Council is considering taking forward an Article 4 Direction to limit this right in certain locations.</p> <p>LP36.E.2 is considered appropriate to provide the appropriate flexibility to prevent long-term vacancies in office premises. It refers to Appendix 1, Marketing Evidence, which sets out the requirement that 'the potential of upgrading the building or adapting the building to meet modern office requirements should be explored'. It specifies that this may include a viability assessment addressing the feasibility of refurbishing or modernising the existing office space. There is a mistake in the wording of this policy requirement, which states that it applies to</p>	Amend 'Offices (E(gi) use class)' in the Marketing Evidence (Appendix 1) to remove reference to the "outside of the protected Office Areas as identified in Policy LP 36).

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						How does the Council propose to protect space now that the change from Class E to C3 is Permitted Development?	office floorspace located outside of the protected areas as identified in Policy LP 36. This should be removed, as it is to these locations that the requirements apply.	
Monica Tross	Sectary to planning committee Battersea Society			820	Policy LP36	<p><b>LP36: Promoting and protecting offices</b></p> <p>There is no reference to the recommendations of the Employment Land and Premises study on offices (pp122-4).</p> <p><b>Flexible rental structure:</b> There is a lack of support for, and cross- reference in this section. to rent assistance/ support for start- up offices as set out in <b>LP41</b></p> <p><b>LP36 C and A:</b></p> <p>Section C refers to offices - unlike those for large enterprises such as Apple and the US Embassy - located outside the Central Activities Zone (CAZ); but it must be made clear that the smaller enterprises referred to in C will be significant as service and ancillary support to the larger firms.</p> <p><b>LP36 E and 18.32 – 18.34</b> We urge Wandsworth to pursue use of Article 4 directions to protect existing commercial spaces, even in light of latest Government proposals now offices are Class E. If this is not feasible the plan should set out what action would be taken to protect existing offices, wherever possible</p>	<p>All of the recommendations set out in the Employment Land and Premises Study (ELPS) have been carefully considered and incorporated within the Regulation 18 Local Plan, where appropriate. Of those referred to on pages 122-124, Recommendation 1 is taken forward in Policy LP 37; the Council already monitors and publishes changes of use relating to economic uses as part of its Authority Monitoring Reports, and will continue to do so, and conditions for protection are set out within Policy LP 36 (Recommendation 2); and the two areas identified in Recommendation 3 are designated as EPAs (renamed EUPAs for consistency of language) in LP 38 (Recommendation 3).</p> <p>Policy LP36 and Policy LP 41 work in tandem, and should be read together. Development proposals for offices that are consistent with LP36 will therefore be required to comply with LP36 (including through the provision of flexible rental structures). It is not necessary to add further clarification in LP36 over the applicability of affordable rental or leasing provisions.</p> <p>The Council recognise that smaller enterprises located in non-CAZ locations may provide service and ancillary support to the larger firms, however this is not precluded by the policy and such a clarification is not necessary for the implementation of the policy itself.</p> <p>The Council are considering proposals to take forward an Article 4 Direction to limit the extent of this PDR with respect to office uses, which now fall under Class E.</p>	No changes to the Local Plan are considered necessary.
Hassan Ahmed Hassan Ahmed	GLA			1108	Policy LP36	<p><b>Offices</b></p> <p>Draft Policy LP36 should set out clearly what the borough's need for office space is over the plan period. The London Office Policy Review 2017 establishes a composite projection for 117,600m2 of office space up to 2041. This is in significant contrast to Wandsworth's evidenced need for just 22,500m2 up to 2034 as set out in paragraph 18.13 of the draft Plan. Paragraph 18.9 of the draft Plan sets out that a further 205,000m2 has been planned for as part of the VNEB OA Planning Framework. As currently drafted it is not clear how these figures relate to the Employment Land and Premises Study (ELPS) 2020 and the LOPR 2017 and this should be set out clearly within the policy or supporting text so that it is explicitly clear what the spatial growth aspirations for office development are for the borough over the course of the Plan period.</p> <p>Policy E1 of the PLP is clear that new office development should be focused in the CAZ and directed to the borough's town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity. The Town Centre Network office guidelines in Table A1.1 of the PLP identifies Clapham Junction and Putney as having mixed-use office potential as there is capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments. The PLP identifies Vauxhall and Battersea as CAZ locations with significant office functions. Tooting, Wandsworth, Lavender Hill / Queenstown Road and Balham are all identified as showing demand for existing office functions, generally within smaller units. These locations should be prioritised as the most suitable locations for new office development over the Plan period.</p>	<p>The need for office floorspace within the borough is derived from the Employment Land and Premises Study (2020), which identifies a demand for office uses in the local and sub-regional office market of 22,500 sqm (i.e. excluding the Vauxhall Nine Elms Battersea Opportunity Area, on the basis that most office development in this location will serve a different market). The borough's ability to meet this, including through an assessment of potential gains and losses, is set out within the Housing and Economic Land Availability Assessment (HELAA), which has informed the policy approach taken.</p> <p>Policy LP 36 (Promoting and Protecting Offices) outlines the Council's preferential locations for new office development, which include the borough's town and local centres, as well as the potential CAZ locations of Battersea Power Station and Nine Elms, near to Vauxhall (consistent with the London Plan and the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework). It is considered helpful to add reference to the London Plan's Town Centre Network office guidelines within the supporting text of the policy, however the Local Plan recognises that different businesses have specific locational requirements, and it is not necessary to therefore specify preference of one centre over another beyond the borough's existing hierarchy. It is further noted that Policy LP 45 (Development in Centres), part A.1 requires that town centre uses, including offices, are in keeping with the centre's role and function within the hierarchy and are of a scale appropriate to the size of the centre and the catchment that it serves, in line with the borough's spatial strategy and Local Plan Policy SS1. The supporting text of that policy should be amended to include reference to the London Plan Town Centre Network.</p>	Amend paragraph 18.16 and paragraph 19.15 to include reference to the London Plan Town Centre Network.
Caroline Marston Caroline Marston	Martson Properties	Mr Paul Watson	Phillips Planning	853	Policy LP36	<p><b>See attachment for context on comment 849</b></p> <p>Policy LP36 Promoting &amp; Protecting Offices</p> <p>20. This policy advises that outside of the Central Activities Zone (CAZ) new office development will also be supported in town and local centres, edge of centre sites and within the EUIA's. Outside these areas i.e., within the Lydden Road LSIA it is noted that office use will only be supported where this has been clearly justified and would not undermine the function of the preferred office locations.</p>	See response to comment number 854, which addresses this issue more fully.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						21. For the reasons set out above it is submitted that the Policy should be amended to allow Office Development within the Lydden Road LSIA if the development is at first floor level or above and forms part of a comprehensive site redevelopment that would deliver clear visual and environmental benefits to that area.		
Dr David Curran	Lavender Hill for Me			1170	Policy LP36	<p>LP36 Promoting and Protecting Offices (Local Plan page 307)</p> <ul style="list-style-type: none"> <li>Broadly support the proposals for large-scale new office space to be located in well connected centres. This represents a significant move away from the previous policy of encouraging office use in sometimes poorly accessible mixed use developments that were residentially dominated, and where it always seemed the office provision had been made grudgingly. This is a pragmatic approach, and is backed up by experience: new office space along the riverside in areas such as Lombard Road and Plantation Wharf struggled to be let, while office space close to the commercial centres and activity areas (including older and lower grade offices along thoroughfares like Lavender Hill) experienced good occupancy levels.</li> <li>We support the policies regarding retention and protection of existing office space. It is worth noting that we have suggested several additional office use buildings that exist in the Lavender Hill area, some of which are not in town centres, and propose these should also be included in EUPA designations: Shakespeare House (168 Lavender Hill), Mortimer House (230-236 Lavender Hill), and 64 and 66Altenburg Gardens.</li> <li>Town centre first approach(18.16): We support the principle that 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. In contrast to major centres, the Borough's Local centres are often very tightly defined in the policy map(typically in terms only of immediate parades of retail units, ignoring the adjacent sometimes larger backlands), and we propose that this would be better expressed as locations 'in or near' local centres. We have some concerns that local centres are defined too narrowly –for example, with the 'Lavender Hill / Queenstown Road' local centre &amp; Battersea Business centre not connected, while in practice they are clearly economically linked) so believe some flexibility in these definitions is needed.</li> </ul> <p>On a similar note, the retail units and adjacent buildings to the Battersea Business Centre should be convertible to small office space, provided they maintain suitable street frontages (noting that to some extent this is in any case the case with Class E use in many of those units). Some, such as the Idea Space serviced office at 83 Lavender Hill, already have been converted from an audio visual retailer to high quality flexible workspace use. We believe that this particular location should arguably be considered part of the Queenstown Road local centre town centre (as flagged elsewhere) which would have a similar effect -but failing that, this policy should recognise the interchangeability of some of these retail / office / workspace functions, alongside the broader activities currently permitted under the Class E use class. Similarly at 66 Altenburg Gardens, new and high quality office use has been developed behind retail units, in an area that is not technically part of a town centre but which is clearly relevant and desirable. We propose the policy in LP36 B(2) on secondary locations would be better defined slightly more broadly as locations 'in or near' Economic Use Protection Areas, to allow a limited degree of organic growth of successful areas.</p>	<p>Broad support noted.</p> <p>Responses to the potential for new economic designations (EUPA) have been provided in response to the more detailed comment # 1172.</p> <p>Local centre boundaries are often deliberately tightly drawn in order to protect a core; effectively allowing the edges to respond to changing market conditions and reducing the scope for longer-term vacancies. That notwithstanding, the sequential test, set out within Part D, guides office development to edge-of-centre sites (including local centres) after consideration of available space within centres themselves. This policy position is already in effect and should be clarified within the policy and supporting text.</p> <p>It is noted that units adjacent to the Battersea Business Centre have converted to office uses, however not all EUPA designations are located such that adjacent units would be suitable for new office premises, and so the addition of 'in or near' is not desirable. As addressed in comment # 1172, it is considered that sufficient flexibility for the units in this parade to accommodate office uses already exists within the Local Plan approach, and no changes need to be made.</p>	Amend Policy LP 36.B to clarify the application of the sequential test, and amend paragraphs 18.21 and 18.61 in conjunction with this. These should clearly set out the application of the sequential test within Wandsworth, including the appropriateness of edge of centre sites for both town and local centres (and other appropriate areas, such as EUPAs).
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1229	Policy LP36	<p><b>See attachment for full context and associated images on comment 1224</b></p> <p><b>Policy LP36 Promoting and Protecting New Office Space Policy</b></p>	Support noted.	No changes required.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						LP36 Promoting and Protecting New Office Space states that LBW will support the development of new office space within emerging centres at Battersea Power Station, Nine Elms and BDTQ. The policy further states that office development in such locations should provide workspace suitable for SMEs. Schroders is supportive of this policy and the introduction of new office space within the BDTQ.		
Mr Robert Arguile	Chair The Putney Society			335	Policy LP37	There's very little of this left in Putney. There should be provision for Urban Logistics Hubs. We note with concern that almost all car repair works in SW15 have closed in the last few years, always to residential.	Comments noted. Policy LP 37 outlines the suitability of a variety of industrial uses, including for 'storage and logistics/distribution'. Urban logistics hubs would fall within this category. The Area Strategy for Putney states that urban logistics hubs will be supported in appropriate locations (Smart Growth, Part E).	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee  Battersea Society			821	Policy LP37	<p><b>LP37 Managing Land for Industry and Distribution</b></p> <p>What are the implications for the protection of industrial land removed from London Plan, as directed by the Secretary of State?</p> <p><b>SIL Queenstown Road:</b> there is a failure to take forward the Employment Land Study including the recommendation for intensification of the SIL south/east of Silverthorne Rd (in the context of forecast need for 8.6 ha more industrial land, and projected loss of 7.6ha).</p> <p><b>Parkfield Industrial estate.</b> There is ambiguity about this area (between the rail lines south of Battersea Park Road and west of Queenstown Road). It is not referred to in the text, but on <b>map 18/1 Economic Land</b> the area is designated SIL. This is a significant industrial area, fully let for which there should be a more explicit policy especially covering access and type of uses (see comment below on 18.59).</p>	<p>As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of 8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers. As such, successful industrial areas are identified within the Plan as holding the potential to help to realise this need. This approach is considered to be consistent with the NPPF's requirement, set out in paragraph 81, that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" and to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period".</p> <p>The policy position for the Queenstown Road, Battersea SIL is set out within Part B of Policy LP 37, which states (in part 3) that the intensified use of the sites for industrial purposes will be strongly encouraged.</p> <p>The Parkfield Industrial Estate is defined as being part of the Queenstown Road, Battersea SIL (in the London Plan). Reference clarifying this has been added to the Nine Elms Area Strategy.</p>	No changes to the Local Plan are considered necessary.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Oliver Milne	Associate Savills	846	Policy LP37	See attachments from Savills on behalf of Legal and General Property Partners regarding Glenville Mews Industrial Estate, Kimber Road, London, SW18 4NJ and its designation as a LSIA.	<p>Support for LP 37 is welcome. It is noted that, in response to representations made by the GLA, and in accordance with London Plan Policy E7.A, Part B.3 of LP 37 has been amended such that intensification refers to the increase in floorspace, rather than through increased 'operating hours or other methods'.</p> <p>With regards to LP40, the Council note that the inclusion of specific quantum (i.e. for both minimum ceiling heights and for goods lifts for multi-story development) are considered useful in terms of setting out the Council's expectations, and are important to ensure that the long-term industrial function of the site is not constrained. It is noted that these minimums are reflected in (and, for the purposes of ceiling heights, slightly lower than) the minimum values for the industrial typologies included in the GLA's 'Industrial Intensification and Co-Location Study: Design and Delivery Testing' (We Made That, 2018). That notwithstanding, the Council recognise that there may be uses which do not require these, and agree that a caveat should be included to the policy requirements to support flexibility. Reference to adequately justified is considered appropriate, but should be caveated such that this could be to support a specific use.</p> <p>With regards to LP41, the reference to viability within the policy should refer to both parts B.2.a and b, however this is otherwise considered to allow appropriate flexibility in the operation of the policy. It is noted that this carries forward the current approach, which has for the most part been effective. It is noted that further information is included within the supporting text and within the Council's Planning Obligations SPD. Reflecting the Council's operation of this policy, further wording has also been added to the supporting text to note that, in certain circumstances, the Council recognise it can be difficult to apply the policy to large storage and distribution uses (B8) the floorspace of which is not easily divisible.</p>	<p>Amend LP40.B to include a caveat stating that any departure for the requirements herein must be adequately justified, for example where appropriate to the specific use, and must not negatively impact the long-term industrial function of the site.</p> <p>Amend Policy LP41.B.2. such that the caveat 'subject to scheme viability' refers to both parts a and b.</p> <p>Add a new section of the supporting text of the policy to clarify that the Council may choose to disapply the policy requirement set out in Part A for large-floorplate storage and distribution uses falling within Use Class B8, where it can be demonstrated that the subdivision of the floorspace is not practical and/or viable. It should further note that the policy will, however, generally be applied to proposals, including for self-storage facilities, where individual units could be leased at a reduced rent or where storage and distribution uses are provided in conjunction with office facilities.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Hassan Ahmed  Hassan Ahmed	GLA			1103	Policy LP37	<p><b>Employment</b></p> <p>It is welcome that the draft Local Plan recognises the important role of industrial and related uses for Wandsworth's economy, as well as the importance for London as a whole of retaining industrial floorspace capacity in the borough, in accordance with the PLP.</p> <p>The borough's strategic approach is underpinned by up to date local evidence as set out in the Employment Land and Premises Study 2020 (ELPS). Based on this study the draft Local Plan identifies 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. The London Industrial Land Demand Study (LILDS) 2017 sets out a need for 16.4ha of industrial land.</p> <p>Policy LP37 of the draft Local Plan identifies that the forecast increase in demand for industrial land contrasts with a projected loss in supply. If all pipeline (approved) development were to come forward the net supply of industrial land in the borough would reduce by 7.6ha. On the other hand, planned development (applications yet to be approved) would provide 1.3ha of additional industrial land.</p> <p>The PLP (Policy E4) requires that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution. Policy LP37, which sets out clearly those uses that are acceptable in the borough's SILs and Locally Significant Industrial Areas (LSIAs – which are the equivalent of the Mayor's Locally Significant Industrial Sites (LSISs)) is welcome and is consistent with PLP Policy E4 part A. Part B3 of the draft Local Plan Policy, however, does not align with the PLP as it accepts increased operating hours or other methods as appropriate measures of industrial intensification; to align with Policy E7 A of the PLP, the intensification of industrial and related business uses should only be assessed in terms of increase in industrial and related floorspace.</p> <p>Part B4 of the draft Policy LP37 diverges from the PLP in the proposed approach to the introduction of non-industrial uses into the Queenstown Road Battersea SIL (the Battersea Design and Technology Quarter). In accordance with Policy E7 of the PLP, co-location of industrial uses with non-industrial uses is not acceptable within SIL. Therefore, if Wandsworth wish to introduce non-industrial uses within some parts of the Battersea Design and Technology Quarter (BDTQ) it would need to be facilitated by a plan-led or masterplanning intensification, consolidation and release approach, which would result in the de-designation of relevant parts of SIL accommodating non-industrial uses.</p> <p>It is understood from paragraph 18.36 of the draft Plan that Locally Significant Industrial Areas (LSIAs) are equivalent to Locally Significant Industrial Sites (LSIS) in the Publication London Plan. Given this Wandsworth should consider renaming the LSIA designation to LSIS or otherwise make this clear, to avoid potential confusion, for example through the application of PLP Policies E6 and E7.</p> <p>As required by PLP Policy E7 (and the requirements therein) Wandsworth should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. This is particularly important in light of the identified positive demand for industrial and related functions to 2034, as well as the projected reduction in supply of suitable industrial land due to pipeline development.</p> <p>The draft Plan policies and Site Allocations provide indications of where additional industrial capacity is expected to come forward or could be potentially delivered via industrial intensification over the Plan's period. Specifically, draft Plan Policy LP37 and supporting text provide a clear framework setting out the role that strategic reservoir of industrial land (SILs and LSIAs) and industrial</p>	<p>Comments noted. It is agreed that the intensification of industrial and related businesses, sought by Policy LP37, should only be assessed in terms of an increase in industrial and related floorspace; rather than increased operating hours and other methods. This should be amended to align with Policy E7.A of the London Plan.</p> <p>A response to the GLA's comments on the Battersea Design and Technology Quarter (BDTQ) is set out in more detail in response to comment # 1104 (below).</p> <p>Paragraph 18.36 clarifies that Locally Significant Industrial Areas (LSIAs) are the equivalent of the London Plan's Locally Significant Industrial Sites, however it is considered helpful to retain a distinction between the two. The London Plan, for example, specifies that it may be appropriate to co-locate residential uses with industrial uses in LSIS, whereas this approach is not taken forward in Wandsworth. Retaining a borough-specific terminology will help to reinforce the borough's position on these areas, and to avoid confusion with other approaches to LSIS (or LSIS-equivalent designation) in other boroughs.</p> <p>The borough has undertaken an Employment Land and Premises Study, which assesses capacity for the redevelopment of economic land. Two more detailed studies - the Wandle Delta Masterplan SPD and the Battersea Design and Technology Quarter Economic Appraisal and Development Framework - consider in more detail scope for industrial intensification (alongside other uses), which have both informed the policy approach within the Local Plan.</p> <p>The capacity of industrial floorspace within the borough over the Local Plan period, accounting for expected and potential gains and losses of industrial floorspace, is set out within the borough's Housing and Economic Land Availability Assessment.</p>	Amend LP37.B.3 to specify that the intensification of industrial and related businesses should only be assessed in terms of an increase in industrial and related floorspace.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>land and premises in other locations (including EUIAs, EUPAs, Focal Points of Activities, etc) could have in meeting identified demand for industrial and related uses.</p> <p>However, with the exception of proposals for the BDTQ and some Site Allocations, the draft Plan includes few details on the amount of additional industrial floorspace (and ha-equivalent) that could be delivered in specific locations over the Plan period. It would be helpful to clearly present in the Plan how the identified industrial demand could be met across Wandsworth's industrial and other locations. This could be set out in a schedule providing details on expected and potential gains and losses of industrial capacity (both in terms of floorspace and land equivalent) across specific locations and sites, highlighting how these cumulatively would ensure that identified industrial and related demand to 2034 is adequately met. These additional details would provide further certainty and ensure that the draft Plan's strategy would be effective in meeting identified demand for industrial and related functions, as well as providing clarity for development management purposes.</p>		
Hassan Ahmed  Hassan Ahmed	GLA			1104	Policy LP37	<p><b>Battersea Design and Technology Quarter (BDTQ)</b></p> <p>As drafted and based on evidence base work, including the Battersea Design and Technology Quarter Economic Appraisal and Development Framework (BDTQ EADF) the draft Plan proposes to introduce approximately 78,000m2 of office space and to increase industrial floorspace by 24,000m2 in parts of the Queenstown Road, Battersea SIL. The proposals for the BDTQ would see the expansion on non-industrial uses in this SIL, effectively resulting in a process of colocation of industrial and office uses. This would be contrary to Policy E7 B which states that the scope for co-locating industrial uses with other uses may be considered in LSIS, but not in SIL. Development proposals to implement the BDTQ aspirations and introduce further office uses in SIL would also not align with Policy E5 C which only supports development proposals for industrial-type activities in SIL.</p> <p>To align Wandsworth's proposals for the BDTQ and PLP Policy E7 Part B the borough should seek to develop a plan-led or masterplanning intensification, consolidation and release approach, clearly setting out in the policies map the areas affected by proposed changes. The process should conform with the approach set out in Policy E7 of the PLP and with the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches. Particular consideration should be given to the deliverability of the proposed approach, including detailed evidence on intensification typologies, phasing and viability of proposed re-development, as well as to ensuring that industrial intensification would be delivered prior to any consolidation and release of SIL.</p> <p>The draft Plan, the BDTQ EADF and related site allocations provide a clear development framework and guidance for the potential transformation of parts of the Queenstown Road, Battersea SIL. The draft Plan policy approach goes some way in meeting the requirements of policies E5 and E7 of the PLP, particularly with regard to the protection and enhancement of the industrial character of the area, the development of intensified industrial typologies, the protection of long-term viability and operational conditions for existing and potential industrial uses (including existing heavy industrial uses), and the recognition that residential uses of any kind are not appropriate in SIL.</p> <p>However, in line with PLP Policy E5 Part A, SILs should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity. Furthermore, PLP Policy E7 Part A states that development plans and development proposals should be proactive and encourage the intensification of industrial-related uses occupying all categories of industrial land. Accordingly, proposals for the BDTQ should prioritise the provision of additional industrial floorspace and primarily maximise the opportunities to increase such provision to meet identified demand for industrial and related uses, also exploring the potential for development of multi-storey industrial schemes.</p>	<p>The Council welcome the GLA's recognition that the draft Local Plan, the BDTQ EADF and the related site allocations provide a clear development framework and guidance for the potential transformation of part of the Queenstown Road, Battersea SIL – which the Council believe has the potential to leverage the investment that is already being made within the wider VNEB OA, build on the area's existing strengths to create new SME jobs, whilst, critically, also delivering intensified industrial floorspace in the SIL, all of which produce considerable wider benefit. It is recognised that the approach to this area does not conform with the requirements of London Plan Policy E7.B, which states that co-location of industrial and non-industrial uses is not acceptable within SIL, and – by extension – with Policy E5.C, which stipulates acceptable uses for SIL (i.e. only industrial and industrial-related uses). That notwithstanding, the Council consider that there are local considerations which justify it.</p> <p>The intention to develop this area as a creative and technological cluster builds on investment in the Battersea Power Station, located immediately to the north of the BDTQ. This investment is realised both in the form of businesses (such as Apple) choosing to lease space within that development, along with the anticipated development of a digital cluster this will engender; as well as in physical infrastructure, most notably through the extension of the Northern Line and the building of the new Battersea Power Station Underground Station. The Council consider that such investment makes the BDTQ particularly suitable for the introduction, through co-location with industrial uses, of new office provision, which is both required in order to meet identified needs, and will result in the creation of jobs locally. This approach reflects the recommendations of the borough's Employment Land and Premises Study.</p> <p>The BDTQ designation builds on the existing policy approach set out within the adopted Local Plan, which recognised part of the area as an 'Industrial Business Park' (itself a designation within the previous London Plan). The adopted Local Plan policy (EI6) states that the IBP should retain a significant industrial function, with all development in these areas providing floorspace for industrial uses. Alongside industrial uses, these parts of the SIL will also be appropriate for research and development (B1b) use as well as SME office accommodation (B1a) provided that the use does not erode the effective operation of the industrial function of the SIL". The BDTQ initiative is considered to represent a continuation of this work, with similar caveats incorporated into the draft Local Plan policy in order to ensure the protection of long-term viability and operational conditions for existing and potential industrial uses (as identified in the GLA's representation). As is noted within the supporting text of the draft Local Plan (paragraph 18.42 of the Regulation 18 version) the Council has been working proactively with landowners and developers within the area, who are generally very supportive of this approach. It is noted that a number of these schemes that have come forward thus far have been referable to the GLA, with comments from officers on the land use element having been supportive in principle.</p> <p>Alongside benefits delivered through investment and the creation of office floorspace, the Council considers the BDTQ designation an appropriate strategy to realise intensified industrial uses within the area. The policy requires that development proposals which introduce non-industrial uses must also provide intensified industrial uses, and new industrial uses are also required to be delivered on the ground floor of existing wholly or predominantly office</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>developments (unless exceptional circumstances prevent this). The development framework set out within the BDTQ EADF identifies that industrial floorspace within the area could increase by approximately 24,000 sqm (see also paragraph 18.45). This contributes significantly towards meeting the identified need for industrial floorspace over the Local Plan period (based on forecasting undertaken as part of the ELPS), which the GLA have asked the borough to demonstrate in their representation.</p> <p>As evidenced through discussions with landowners as part of consultation undertaken to inform the BDTQ study, as well as through subsequent pre-applications, these parties have shown interest in realising the intensification of industrial floorspace at the scale identified above, however only where this can be cross-subsidised through the provision of office uses on upper storeys (which are generally considered to be less appropriate for industrial uses). It is noted that while the policy permits – and indeed encourages – multi-storey industrial schemes, to date there has been limited commercial interest in these coming forward within the area (particularly at the scale required).</p> <p>In accordance with the above, and contrary to the recommendations included within the representation, the Council do not wish to de-designate this area as SIL – the advice provided by the GLA in order to make any such co-location (London Plan) policy compliant. As is made clear within the supporting text (paragraph 18.43 of the Regulation 18 Local Plan), the Council intend that the BDTQ concept should reinforce the area’s SIL designation, and that any development within this location should protect and enhance the industrial character of the area. The de-designation of this part of the SIL would, in the Council’s opinion, represent a reduction in the policy protection afforded to this industrial function of this land, and would therefore be contrary to the Council’s ambitions.</p> <p>The approach to the BDTQ must also be set in context of the borough’s treatment of industrial land elsewhere within the borough. The borough’s policy approach to Locally Significant Industrial Land (LSIAs – equivalent to the London Plan’s LSIS designation) does not permit co-location with non-industrial uses, thereby retaining this land exclusively for industrial function (including waste requirements). This approach is, as with the BDTQ, geographically informed: the location of these areas along the Wandle Valley make them less suitable for the provision other economic uses (e.g. offices) – even if this were to assist with the provision of industrial capacity – and the Council considers that the introduction of non-economic uses (e.g. residential, other commercial) could undermine the primary industrial function through tensions between different land uses.</p> <p>It is further noted that the Council has re-designated one of the borough’s Locally Significant Industrial Areas (LSIAs) as SIL, which reflects both the findings of the borough’s ELPS, as well as the identification of the broader ‘North Wimbledon / Garrett Business Park (Summerstown)’ industrial area, which covers areas of both Merton and Wandsworth boroughs, as a SIL.</p> <p>Finally, it is noted that minor amendments have been made to the BDTQ boundary which remove the railway depot from this policy designation. While this area was included within the study in order to support an holistic assessment of the area, it was considered to have ‘no potential for intensification’ and has therefore been removed.</p> <p>The Council has engaged with the GLA following the submission of these representations, and will continue to work with officers as necessary. It is hoped that the above is useful to provide further information on the policy position taken by the Council within the Regulation 19 Local Plan, notwithstanding the comments made in the GLA’s representations.</p>	
Hassan Ahmed  Hassan Ahmed	GLA			1105	Policy LP37	<p>Economic Use Intensification Areas (EUIAs) and Focal Points of Activity</p> <p>A more fine-grained approach to the 10ha of vacant and under-utilised land within Focal Points and EUIAs which have the potential for re-development and intensification of industrial capacity would be helpful in understanding where and how much additional industrial capacity could be delivered in these locations. Further work to estimate the potential capacity uplift for industrial uses in these and other locations (including EUPAs and other existing non-designated industrial sites) should be developed to better inform the borough’s strategic approach and to ensure enough industrial capacity is identified to meet its industrial needs over the Plan period. The introduction of non-industrial uses</p>	<p>The borough’s Housing and Economic Land Availability Assessment sets out in more detail the borough’s industrial capacity over the course of the Local Plan.</p> <p>The Council acknowledges the definition of affordable workspace set out within the London Plan, and this is considered to be consistent with the requirement, set out in LP41.2.b for discounted floorspace.</p> <p>As set out within the supporting text of the Local Plan, paragraph 18.76, the borough also recognises that the features common to managed or open workspaces, such as different leasing arrangements, flexible practices, business support, and so forth can combine to make premises more affordable, particularly for start up businesses and SMEs. This reflects and builds on the concept of</p>	<p>Amend the LP41 to ensure consistency of language with regard to terminology, in particular ‘open’ (replacing previous references to ‘managed’) and ‘affordable’ workspace, and to better clarify the distinction between the two.</p> <p>Add definitions of affordable workspace (as per the GLA) and open workspace to the Glossary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>within industrial land outside of the strategic reservoir should follow the criteria set out in Policy E7C of the PLP, where this is appropriate, which are partly reflected in Part D of draft Policy LP37.</p> <p>The borough's intention to secure affordable, flexible and managed workspace is welcome but regard should be had to the definition of 'workspace' as set out in Policy E3 of the PLP.</p> <p>Paragraph 6.3.2 of the PLP defines affordable workspace as workspace that is provided at rents maintained below the market rate for that space for a specific, social, cultural or economic development purpose and Wandsworth should have regard for that definition.</p>	<p>open workspaces set out within the GLA report 'Creating Open Workspaces'. For clarity, this should be referred to as open workspace, and should be defined both in the supporting text and in the glossary.</p> <p>Both approaches are therefore set out within the broader policy LP41. It is agreed that the distinction between the two could be better drawn out within the policy, and a greater consistency of approach with regard to language used. The London Plan definition for affordable workspace should also be added to the Local Plan.</p>	
<p>Caroline Marston</p> <p>Caroline Marston</p>	<p>Martson Properties</p>	<p>Mr Paul Watson</p>	<p>Phillips Planning</p>	<p>854</p>	<p>Policy LP37</p>	<p><b>See attachment for context on comment 849</b></p> <p>Policy LP37 Managing Land for Industry &amp; Development</p> <p>22. This Policy again seeks to prevent new office use within the Lydden Road LSIA unless ancillary to an industrial or warehousing operation.</p> <p>Part 4 (a) of the Policy is drafted as follows:</p> <p>"4. Developments proposals for other uses in these locations will not be supported, except in the following circumstances:</p> <ol style="list-style-type: none"> <li>Office uses will only be supported where they are ancillary to the use of the site or premises for one or more of the industrial uses identified in Part A"</li> <li>Again, for the reasons already outlined we ask that subsection (a) is updated allowing for some flexibility as follows:</li> </ol> <p>"a. Office uses will only be supported where they are ancillary to the use of the site or premises for one or more of the industrial uses identified in Part A or are located at first floor level and above and forms part of a comprehensive redevelopment scheme that would deliver clear visual and environmental benefits to the area."</p> <p><b>Conclusions</b></p> <p>25. The objectives for the Wandle Valley as set out in the plan are fully supported, in particular at paragraph 12.12, the desire to protect the strategic reservoir of industrial land whilst creating opportunities to intensify provision and at 12.4 where it is acknowledged that there are a number of poorer quality buildings in the Lydden Road LSIA, "which could be redeveloped to provide facilities which are more fit for purpose."</p> <p>26. Unfortunately, the policies set out in the draft plan (PM10, LP36 and LP37) will not as drafted create the conditions which will enable these objectives to be met. It is respectfully our submission that the policies unrealistically promote comprehensive redevelopment at higher densities, with the aim of enhancing the appearance of the Lydden Road LSIA whilst restricting any flexibility to include higher value office uses at upper floors which will make such redevelopment a viable proposition.</p> <p>27. In basic terms there will be little incentive for owners to invest in good quality redevelopment schemes if the rental levels achievable do not support this. There are also simply practical issues with building multiple storeys in industrial use without access to sufficient external yard and servicing space.</p>	<p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>As part of the ELPS study, stakeholders from the Lydden Road area were invited to participate in a workshop and to submit information to assist with the study. That information was carefully considered at the time of the study, and is accounted for within its conclusions. The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP 37 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Waste Management), Part D specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the provision of office development within the LSIA. The Council is cognisant of the need to provide office floorspace; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4 in locations that are preferential and/or strategically more appropriate than within the borough's designated strategic reservoir of industrial land.</p>	<p>No changes to the Local Plan are considered necessary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>28. By allowing some office uses above ground floor level as part of redevelopment schemes, accessed from the south of Bendon Valley, (which also ensures no loss of industrial and / or warehousing floorspace), the Council will incentivise owners and facilitate the enhancements of the Lydden Road area that are clearly desired.</p> <p>29. It is also relevant to highlight that the Lydden Road area is surrounded by / lies within a very short walking distance of a large working age residential population. There would be clear sustainability advantageous of providing some higher density office uses in this area to serve this population and so minimise their need to travel and improve the potential of walking to work. Balancing the provision of new jobs with the residential population in this area would assist the Council in meeting its Environment and Sustainability Strategy of becoming a carbon neutral council by 2030 and a zero emission council by 2050.</p>	<p>The representation made reference to the redesignation of adjacent land, now within the Bendon Valley EUIA, as precedent for the potential redevelopment of the Lydden Road LSIA. This designation does permit the co-location of different uses, however the context for this redesignation was notably different, both with respect to the existing uses on site (including significant car parking and a disused trampoline centre), and to the scope and typology of identified industrial need when that re-designation was made. Furthermore, it is noted that while the scheme realises an intensification of the existing industrial uses, these are primarily realised as light industrial units, rather than units suitable for the storage and distribution uses which, as identified above, are driving the demand for industrial floorspace. The site is yet to be developed and it will be important for the Council to monitor the efficacy of the co-located uses in practice.</p> <p>For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.</p>	
Mr Graham Barrett	Protean Developments	Ms Claire Clark	Associate Director Rolfe Judd Planning	876	Policy LP37	<p>We write on behalf of our client Protean Developments, to make representations on the London Borough of Wandsworth Local Plan which is out for consultation.</p> <p>These representations are written with specific reference to the following site:</p> <p>Gatto Tool Hire, 206-212 Garratt Lane, SW184EB</p>	<p>The Council's Employment Land and Premises Study 2020 (ELPS) has identified a net requirement for 8.6 hectares of industrial land up to 2034. The suitability of the Borough's Locally Significant Industrial Areas (LSIAs) was considered as part of the Employment Land and Premises Study (ELPS), which found that "to ensure that the Borough can meet its demand over the plan period, this study recommends that the Council maintain the protection of all SIL and LSIAs in the Borough". The Council agrees with this recommendation. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6 of which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p>	No changes to the Local Plan are considered necessary.
Covent Garden Market Authority		Mr Philip Robin	Consultant Jones Lang Lasalle	1040	Policy LP37	<ol style="list-style-type: none"> <li>The underlying rationale of the redevelopment plans for New Covent Garden Market (NCGM) currently being implemented is to ensure the fruit, vegetable and flower wholesale market continues to operate and flourish in the long term.</li> <li>Since NCGM moved to Nine Elms in 1974, significant changes have taken place in the food wholesaling sector, particularly due to the increased dominance of supermarkets with their own distribution systems. NCGM has changed its activities in response to these changes which has seen increased fresh food distribution and food processing, a greater focus on central London end users and a widening of activities in the food sector generally.</li> <li>A key factor for the market is accessibility to central London, and this was the reason for the market remaining in its current location, rather than moving to a more suburban location. The market relies upon the use of lorries and vans, but most vehicle movements occur during night-time hours. This is important in the context of planning policies that seek to reduce the use of motorised vehicles.</li> <li>The redevelopment proposals will provide facilities better suited to current activities and to provide flexible floorspace that is better able to respond to future changes in the food industry. Whilst the market will operate on a reduced size site, the total trading space and level of activity will increase.</li> <li>The wholesale market includes the various core activities of the fruit, vegetable and flower markets, but also other added value food activities such as food processing, and it is anticipated these types of activity could increase in the future.</li> <li>It is important to ensure that the wholesale market activities are protected not only from changes of use to non-employment uses, but also from changes of use to B Use Classes, as there could be pressure from such uses as the quantum of employment land further shrinks.</li> <li>Additionally, development that takes place in the vicinity of the wholesale market, especially residential uses, should be designed in a manner to minimise potential conflict arising from wholesale market activities.</li> <li>An important part of the redevelopment of NCGM is to create a food hub for London. As well as the core wholesale activities, the new market will include incubator space and business support for start-up</li> </ol>	Support noted.	No changes required.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>businesses, workspace for food-related businesses, a retail market, restaurants, food shops and education floorspace. The aim is to become a showcase for food in London. It will help provide a focus and sense of place for the Nine Elms Vauxhall area.</p> <p>NCGM is an important employer (over 2,500 work at the market a good proportion of whom live locally) but it also has links to other employment uses in the area who form part of the "supply chain". A study by Aston University gives a multiplier factor of 3 jobs for every job based at a wholesale market. It is important that general industrial, uses are protected to enable these synergies to be maintained and enhanced in the future. For example tenants' vehicles and equipment needs to be maintained, so it is important that these services are available in close proximity.</p>		
	CBRE	Mr Jeremy Evershed	Montagu Evans LLP	1249	Policy LP37	See attached full representation	<p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>As part of the ELPS study, stakeholders from the Lydden Road area were invited to participate in a workshop and to submit information to assist with the study. That information was carefully considered at the time of the study, and is accounted for within its conclusions. The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan, and it is noted that there are, therefore, not considered to be "other locations within the Borough which... would be better suited" for industrial land, as suggested in the representation. Policy LP 37 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Waste Management), Part D specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the provision of additional housing and office development. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.</p> <p>The representation made reference to the redesignation of adjacent land, now within the Bendon Valley EUJA, as precedent for the potential redevelopment of the Lydden Road LSIA. This designation does permit the co-location of different uses, however the context for this redesignation was notably different, both with respect to the existing uses on site (including significant car parking and a disused trampoline centre), and to the scope and typology of identified industrial need when that re-designation was made. Furthermore, it is noted that while the scheme realises an intensification of the existing industrial uses, these are primarily realised as light industrial units, rather than units suitable for the storage and distribution uses which, as identified above, are driving the demand for industrial floorspace. The site is yet to be developed and it will be important for the Council to monitor the efficacy of the co-located uses in practice.</p> <p>For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.</p>	
VSM Estates	VSM Estates	Freya Turtle	Associate Director Turley Associates	1066	Policy LP37	<p><b>For full context, see the attachment with comment 1058</b></p> <p>Policy - LP37 Managing Land for Industry and Distribution</p> <p>London Plan conformity - Policy LP37 seeks to protect the primary function of NCGM for a wholesale retail facility. This accords with London Plan Policy E4 and its requirement to make provision for the operation of wholesale markets.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - Policy LP37 states that the railway arches adjacent to NCGM should be protected for wholesale retail purposes. VSM seeks Policy LP37 to clarify that this relates to the railway arches immediately adjacent to the wholesale market and not those other arches near to the wider NCGM surplus land sites, particularly at the Apex Site (which as mentioned previously should be allocated for flexible commercial uses in Class E).</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - Clarify that this relates to the railway arches immediately adjacent to the wholesale market and not those other arches near to the wider NCGM site.</p>	<p>It is agreed that the policy should for clarity state that this refers to the arches 'immediately' adjacent to the functioning market, rather than the site. Where broader uses are introduced in other arches (i.e. those not immediately adjacent to the site), these should support the creation of the Food and Horticultural Quarter as set out in the Nine Elms Cultural Strategy.</p> <p>Please note that further detail is provided on this within the supporting text in paragraph 18.70.</p>	<p>Amend LP39.A.3 to refer to the railway arches 'immediately' adjacent to the functioning NCGM, rather than the site. This should also be reflected in LP37.</p> <p>Amend LP39.A.3 to further state that the use of the railway arches adjacent to the rest of the NCGM site should support the creation of the Food and Horticultural Quarter as set out in the Nine Elms Cultural Strategy, reflecting the connectivity and placemaking role that these locations will perform. Update the supporting text accordingly.</p>
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1134	Policy LP37	<p>LP37 Managing Land for Industry and Distribution</p> <p>The policy strongly encourages the intensified use of sites for industrial purposes which is fully supported. The support for SME office accommodation and research and development uses on upper floors within the BDTQ is also supported.</p> <p>However, it is suggested that the requirement provide at least the full replacement of existing industrial floorspace is not consistent with the Publication London Plan, which was updated following modifications proposed by the Secretary of State to remove a requirement to ensure "no net loss of industrial uses" on the basis that it may not be realistic and would therefore fail the "effective" test of soundness. On this basis, it is proposed that further flexibility is introduced to ensure that the plan is consistent with the Publication London Plan and the NPPF.</p>	<p>Support noted.</p> <p>As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of 8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers.</p> <p>As such, successful industrial areas, such as within the Queenstown Road, Battersea SIL - and in particular the area identified as the Battersea Design and Technology Quarter (BDTQ), are identified within the Plan as holding the potential to realise this need. This also reflects the findings of the borough's Employment Land and Premises Study, 2020. This approach is considered to be consistent</p>	<p>No changes to the Local Plan are considered necessary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>It is therefore suggested that the following amendments are made to the wording:</p> <p>LP37 Managing Land for Industry and Distribution</p> <p>Strategic Reservoir of Industrial Land</p> <p>2. The redevelopment of sites <u>must should aim to provide</u> at least the full replacement of existing industrial floorspace, in accordance with those uses identified in Part A, <u>unless it can be demonstrated that full replacement is not feasible.</u></p>	<p>with the NPPF's requirement, set out in paragraph 81, that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" and to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period".</p>	
Unknown	Style and Space Contractors Limited	Jeff Field	Senior Director BNP Paribas Real Estate	1153	Policy LP37	See attached full representation.	<p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP 37 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Waste Management), Part D specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>It is recognised that in the appeal decision referenced within the representation, consideration of the impact of non-industrial uses upon the activities within the LSIA was made, and the Inspector found that "the proposed non-industrial uses would...be unlikely to undermine the functionality or attractiveness of the industrial offer", however such considerations were made in the context of 'the proposed industrial uses' on the appeal site, rather than those within the LSIA as a whole. Furthermore, the appeal notes that the site proposals do "not include any general industrial use which would be more likely to generate levels of noise and disturbance to residential occupiers", whereas such uses form the mainstay of the borough's industrial need over the Local Plan period (as identified above).</p> <p>In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the provision of additional housing and office development. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.</p> <p>Furthermore, the Council does not agree with the assertion made in the representation that "the Plan does not comply with the New London Plan" with respect to Policy E7. Policy E7 states that in LSIS (the equivalent of the borough's LSIA), "the scope for co-locating industrial uses with residential and other uses may be considered", however it does not require such an approach. The supporting text notes that "some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses". As identified above, the demand for industrial uses identified within the borough's ELPS is predominantly derived from a demand for storage and distribution uses falling within use class B8.</p> <p>For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.</p>	
	Ipsus Developments Ltd	Grant Leggett	Head of Planning Boyer Planning Ltd	1222	Policy LP37	See attachment for full representation.	<p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>As part of the ELPS study, stakeholders from the Lydden Road area were invited to participate in a workshop and to submit information to assist with the study. That information was carefully considered at the time of the study, and is accounted for within its conclusions. The study recommended that employment land within the designated SILs and LSIA's remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP 37 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA's. Policy LP 13 (Waste Management), Part D specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA's. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land. Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>In promoting the co-location of re-provided and/or industrial uses, the representation posits the potential benefits that would be delivered through the</p>	No changes to the Local Plan are considered necessary.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>provision of additional housing and office development. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.</p> <p>The representation made reference to the redesignation of adjacent land, now within the Bendon Valley EUJA, as precedent for the potential redevelopment of the Lydden Road LSIA. This designation does permit the co-location of different uses, however the context for this redesignation was notably different, both with respect to the existing uses on site (including significant car parking and a disused trampoline centre), and to the scope and typology of identified industrial need when that re-designation was made. Furthermore, it is noted that while the scheme realises an intensification of the existing industrial uses, these are primarily realised as light industrial units, rather than units suitable for the storage and distribution uses which, as identified above, are driving the demand for industrial floorspace. The site is yet to be developed and it will be important for the Council to monitor the efficacy of the co-located uses in practice.</p> <p>The representation made reference to introduction and impact of Class E, which it notes "renders both parts of draft Policy LP37 largely redundant". It is recognised that where changes between uses within the same Class, the Local Plan is circumvented, and the policy can only set out the approach for applications which require assessment against it. The Council do not share the view that many of the non-supported uses, identified herein, are particularly suitable for the location and are therefore likely to proliferate within the area. However, as the representation makes clear, the control over such changes of uses is, in any case, beyond that of the LPA.</p> <p>Similarly, the representation made reference to the introduction of new permitted development rights, including the right which allows the change of use of existing Class E premises to residential use. It is noted that, in line with the approach set out in the Local Plan, the Council has prepared an Article 4 Direction which seeks to remove these rights within certain locations, including the borough's LSIA's. Further, it is noted that the permitted development right is subject to the prior approval condition giving consideration of the "impact on future residents from the introduction of residential use in an area the authority considers is important for heavy industry, waste management, storage or distribution". This prior condition, in effect, mirrors the Council's own position that the co-location of such uses with residential is likely to result in conflicts between the two uses.</p> <p>The representation also made reference to appeal decisions at 150a-170 Penwith Road and 2-8 Thornsett Road, London SW18 4AQ (refs: APP/H5960/W/323560 and APP/H5960/W/19/3235608). The Council is cognisant of this decision, and has taken this into consideration in drafting the new Local Plan. It is noted that the Inspector took consideration of the "very close proximity to Earlsfield centre" as part of his assessment for whether the introduction of other uses (A1, B1a and C3) was appropriate, noting it as a sequentially acceptable location for the retail and office provision and a highly sustainable location for the proposed residential units. The Council do not consider that these apply as readily in the instance of sites in Lydden Road. Further, the Inspector's conclusions that "the proposed non-industrial uses would...be unlikely to undermine the functionality or attractiveness of the industrial offer" was made in the context of 'the proposed industrial uses' on the appeal site, rather than those within the LSIA as a whole. In this context, the appeal noted that the proposals do "not include any general industrial use which would be more likely to generate levels of noise and disturbance to residential occupiers", whereas such uses form the mainstay of the borough's industrial need over the Local Plan period (as identified above).</p> <p>For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.</p>	
Schroders	Schroders Real Estate	Jeremy Castle	Deloitte LLP	1230	Policy LP37	<b>See attachment for full context and associated images on comment 1224</b>	Support noted.	No changes required.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Investment Management					<p><b>LP37 Managing Land for Industry and Distribution</b></p> <p>Policy LP37 Managing Land for Industry and Distribution states that "in the BDTQ, SME office accommodation and research and development uses will be appropriate on upper floors, provided that the use does not erode the effective operation of the industrial function of the SIL." It further states that "if the existing use of the site is solely or predominantly for office use, redevelopment must provide for new industrial uses on the ground floor, unless this would result in harm to a heritage asset or would cause material harm to the amenity of neighbouring occupiers or the operations of neighbouring uses". Schroders is supportive of the flexibility this policy allows in intensifying SILs to provide additional office space.</p>		
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1310	Policy LP37	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP37 - Managing Land for Industry and Distribution</b></p> <p>We have strong reservations that the draft New Wandsworth Plan goes further than the New London Plan Publication Version (2020) in protecting against loss of industrial land, with a principle of 'no net loss' of industrial floorspace capacity approach.</p> <p>Industrial sites present the greatest opportunity to deliver large-scale mixed use development schemes in London. We are deeply concerned that the protection of industrial land through a blanket no net loss of industrial floorspace is highly inflexible and will hinder the delivery of large-scale mixed use schemes and the overarching intent of Policy H1 to significantly increase the number of homes to be provided across the lifetime of the plan.</p> <p>There are many instances where industrial sites are experiencing significant decline and stagnation, due to factors such as poor accessibility or an increasingly obsolete business location. In such cases, industrial units might remain occupied by tenants on nominal rents to simply avoid the site becoming run down or vacant.</p> <p>While we appreciate the desire to protect certain more intensive industries that provide a vital role within the Borough, the location of these uses within the SIL and LSIS is most appropriate. We are therefore particularly concerned that significant weight is given to the protection of non-designated industrial sites in part C of Policy LP37.</p> <p>The current wording of Policy LP37 appears to suggest that the opportunity for the release of nondesignated industrial sites for other uses may not be appropriate, unless in exceptional circumstances or where a full re-provision of floorspace is provided. This directly contradicts New London Plan Publication Version (2020) Policy E7 (C) which following direction from the Secretary of State (December 2020) removes the requirement for re-provision on site instead favouring the following wording:</p> <p>Industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space).</p> <p>Ensuring clarity in terminology and approach is critical so that developers have clear guidance on the approach to be taken to the management of industrial floorspace capacity at borough level. Without this continuity in approach the Councils risks undermining the delivery of new homes with Borough which, as shown through the designated areas of intensification, are prioritised into locations which have a high concentration of industrial uses.</p> <p>We therefore request that the policy wording is updated to reflect the flexibility introduced by the recent revisions to the New London Plan Publication Version (2020).</p>	<p>As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of 8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers. The requirement for the protection (and intensification, where possible) of industrial uses in designated policy areas such as Economic Use Protection Areas (EUPAs), Economic Use Intensification Areas (EUIAs), and Focal Points of Activity is therefore considered appropriate. Further detail is set out on requirements for each designation within LP35 (Mixed Use Development on Economic Land). For existing industrial land and premises that are not otherwise designated, however, it is agreed that the requirement for the full re-provision is potentially contrary to the London Plan, Policy E7.C, which only requires that "industrial, storage or distribution floorspace is provided as part of mixed-use intensification". The policy should be amended to correct this.</p>	<p>Amend Policy LP37 (Managing Land for Industry and Distribution) , Part D to require that "industrial, storage or distribution floorspace is provided, in accordance with Policy LP38 (Mixed Use Development on Economic Land)", rather than "the provision of industrial floorspace will be fully re-provided or intensified". Amend supporting text to reflect this.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Michael Atkins	Senior Planning Officer Port of London Authority			1472	Policy LP37	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>12. Building a Strong Economy</p> <p>- Policy LP37: Managing Land for Industry and Distribution.</p> <p>In principle support parts A &amp; B of the policy that states the borough will support the use of land and premises for industry and distribution in appropriate locations, and will protect and retain a strategic reservoir of industrial land, comprised of the borough's Strategic Industrial Locations (SILs) and Locally Significant Industrial Areas (LSIAs).</p> <p>the PLA considers priority must be given in this policy to the continued safeguarding and intensification of use of the boroughs safeguarded wharves for waterborne cargo handling, in line the current and emerging London Plan, including policy E4 (Land for industry, logistics and services to support London's economic function) which specifically states that:</p> <p>"The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that: 1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport."</p>	Support noted. Given the borough's identified need for industrial floorspace and land over the Local Plan period, the borough puts forward a policy approach that seeks to retain, enhance and, where appropriate, intensify (provide additional industrial capacity) in all areas where there are existing clusters of industrial land (which is discussed in detail in this policy and Policy LP 38), many of which meet the criteria of London Plan Policy E4, Part D.1 already. As such, the prioritisation of particular locations is not considered necessary detail to add to the Local Plan, however it is noted that the London Plan forms part of the Development Plan for the borough and therefore the criteria of the policy would apply. The Local Plan also outlines specific guidance for the protection and enhancement of the borough's safeguarded wharves in Policy LP 43.	No changes to the Local Plan are considered necessary.
Safestore		Matthew Lloyd Ruck	Planner Savills	1384	Policy LP37	<p><b>See attached to comment 1382 the full representation for context</b></p> <p><b>Managing Land for Industry - LP 37 Evidence Base</b></p> <p><b>Flexible Industrial Spaces</b></p> <p>The emerging local plan policy should align with the Publication 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 London Plan Policy E7 which promotes intensification, colocation and substitution.</p> <p>The publication version of the London Plan supports the opportunity to intensify existing employment and industrial uses, as part of a plan-led process, or through a masterplan approach. This intensification and consolidation could free up land for co-location of industrial land with other uses. In order for the local plan to be considered sound, it must be consistent with regional and national policy. Wandsworth's draft policy LP37 should reflect the attitudes towards intensification, co-location and substitution within the London Plan.</p> <p>We suggest that through Wandsworth's Local Plan review these opportunities for intensification and co-location should be encouraged to facilitate existing sites to make the maximum contribution to the Borough. Providing the flexibility could provide optimal conditions for start-ups, SME's and a strong economic base for local jobs as the market and demands shift, allows the local economy to flourish, in line with the aims of the Nine-Elms Opportunity Area and the BDTQM.</p> <p>As previously outlined, flexibility is necessary to allow vibrant and healthy areas of enterprise to grow within urban centres. There are many examples of Safestore co-habiting with other land used within the capital, such as stores in Marble Arch, Camden, Hackney, Notting Hill and Chelsea.</p> <p>There are therefore many potential land uses that could be successfully co-located with a B8 storage and distribution centre which would complement the strategic objectives of the Nine Elms/Battersea Opportunity area and the more localised BDTQM. For example, development involving B8 storage and distribution at lower floors and office space above may compliment the surrounding BDTQM. Alternatively, a short-stay residential offering like a hotel could provide accommodation for workers on business trips to the BDTQM. As is evident across London, a blend of different uses in the same location can</p>	<p>Please see the response to Safestore's representation on the Nine Elms Area Strategy (comment # 1383).</p> <p>As identified within that response, the Council intend for any redevelopment to protect and enhance the industrial character of the area - and indeed to intensify the provision of industrial capacity, where appropriate. As such, the introduction of non-economic uses within the area, other than in the circumstances identified in LP 37, is not considered appropriate.</p> <p>The approach set out is considered to be consistent with paragraph 82 of the NPPF.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>create successful hubs of activity, which deliver resilient places. We consider that a degree of flexibility to these designations would greatly benefit the site, enabling landowners to take a proactive approach towards the needs of Ingate Place.</p> <p>Restricting the potential land uses on-site has decreased the development opportunities for Ingate Place and its ability to contribute to the BDTQM and wider Battersea/Nine-Elms Opportunity Area. The designated land uses are overly specific and have a disregard for any flexibility that the area may need to adapt to meet the rapidly changing future markets and needs.</p> <p>For reasons that have been discussed, the site has significant unrealised potential for intensification and a clear strategic policy promoting commercial and other uses would help to unlock this. Enabling a mix of employment and non-employment uses within Ingate Place would provide place-making benefits such as increased vitality through integrating culture, community and workspace to create a thriving place. It can also provide economic benefits through opportunities for cross-collaboration between businesses, cross-subsidy to enhance the viability of development proposals to facilitate delivery, and the potential for employment land intensification.</p> <p>Establishing a more flexible approach to the planning policy framework would benefit the wider LBW economy as well as this specific site. As currently drafted, the local plan is therefore not in general conformity with the national policy, specifically paragraph 11 of the NPPF, which seeks to ensure plan policy is sufficiently flexible to adapt to rapid change</p>		
Mr Robert Arguile	Chair The Putney Society			336	Policy LP38	Mixed use is also good for small scale sites in town centres.	Comment noted. Policy LP 38 relates to the Local Plan's economic land designations, where these accommodate industrial or office functions in non-centre locations. Mixed-use development within town centres is promoted in Policy LP 45 Development in Centres.	No changes considered necessary for the Local Plan.
Monica Tross	Sectary to planning committee Battersea Society			823	Policy LP38	<p><b>LP38 Mixed Use Development on Economic Land</b></p> <p><b>Focal Points of Activity:</b> There are some significant gaps in elements of the strategy. While there are many references to Focal Points of Activity (<b>11.3, LP37C3, 18.49 etc etc</b>) there is no introductory discussion of exactly what they are or their function, notably no reference in para <b>18.5 and map 18/1 Economic Land</b>.</p> <p>Thus there is no ready explanation of where they stand alongside the other typology of industrial area (which is where they appear to sit although there may be other elements of activity) Is the suggestion in <b>18.66</b> to maintain industrial activity north of York Road realistic, especially in the Chatfield Street area, given residential development pressures? Site allocations for Lombard/York Road would actually allow removal of successful industrial land.</p> <p>The proposals for the York Road/Lombard Road Focal point as presented do not reflect the thrust of the Cultural Strategy for the area, published in 2018. The type of new development coming on stream (such as the Royal Academy of Dance, the redevelopment of Access Storage and the Collective) would appear to be a more realistic strategic approach than that outlined in the site specific discussions. Much of that Cultural Strategy should also apply to the area around the RCA/Ransome's Dock.</p> <p><b>Employment protection areas:</b> The designation of these appears haphazard. In <b>18.59</b> the proposal to designate Culvert House and the View may be sensible but needs fuller justification and some indication of how space in the View will be promoted and marketed. In addition, has any assessment been made of the impact of increased activity on these sites (alongside pressures from access to Parkfield Industrial estate) for traffic movement around the Culvert Road/ Battersea Park Road intersection? Culvert Road is</p>	<p>Focal Points of Activity is not exclusively an economic land designation; rather, their designation is based on their proximity to the River Thames and the Council's ambition to capitalise on this. Further detail is set out in Policy LP61 (Riverside Uses, Including River-dependent, River-related and River Adjacent Uses). The areas, however, do contain clusters of economic use - as noted in paragraphs 18.66, which, alongside 18.67, provides background on the economic aspect of these designations. This paragraph further states the reasoning for the approach, which is based on the identified demand for economic uses across the borough as a whole - and the need, therefore, to protect and intensify, especially for industrial uses. It further identifies the type of uses expected - such as small industrial units and maker-space facilities - due to the proximity with residential uses being developed in the area. Such uses can provide important creative workspace, or simply storage space for props, etc, which can support cultural activities.</p> <p>It is agreed that, due to their economic role, Focal Points of Activity are included on Map 18.1 Economic Land.</p> <p>The Council has developed a comprehensive Arts and Culture Strategy for the borough as a whole.</p> <p>The inclusion of Culvert House and the View is based on the recommendation of and justified by the Employment Land and Premises Study 2020. The policy provides protection of the use of land in order to meet identified needs, and is not itself a site allocation. It is not appropriate to focus on aspects such as the promotion and marketing of specific sites. In turn, all development proposals that adhere to the land use requirements (e.g. for the provision or intensification of economic space) would be required to account for impact on traffic through normal development management processes. It is noted that the policy requires that development "would not give rise to any material harm to the character of the area, the operation of neighbouring uses or the amenity of neighbouring residents" (wording slightly amended for clarity).</p>	<p>Minor changes to LP38.A.1 to improve the clarity of the policy with respect to the 'amenity of neighbouring residents'.</p> <p>Amend the Economic Land map to include Focal Points of Activity.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						regularly used as a rat-run along Sheepcote Lane to and from the Latchmere Road.  <b>Smaller protected sites:</b> There do not seem to be any common criteria as to which sites have been mentioned or omitted. Why include 124 Latchmere Road and 187-207 Lavender Hill (the latter being mainly residential) without including the nearby Shakespeare House (wholly offices) and the SHARE community building on Altenburg Gardens?	Both Shakespeare House and the SHARE community building on Altenburg Gardens are located within Clapham Junction Town Centre, and are therefore identified as preferential locations for offices, which are protected in that capacity as per LP 36 (Promoting and Protecting Offices).	
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1146	Policy LP38	<b>LP38 Mixed Use Development on Economic Land</b>  The policy requires that for sites within Economic Use Intensification Areas (EUIAs) where the site accommodates an existing industrial use, or where the site previously accommodated industrial uses, any mixed-use proposal must provide for an increase in industrial floorspace.  As set out above, this is not consistent with the approach taken in the Publication London Plan following modifications required by the Secretary of State. It is suggested that the wording is updated to provide further flexibility on the basis that requiring an increase in industrial uses "may not be realistic" and would therefore fail the test of soundness.  It is suggested that the wording is therefore updated as follows:  LP38 Mixed Use Development on Economic Land  Economic Use Intensification Areas (EUIAs): Proposals which would result in the intensification of existing economic floorspace will be supported. Where the site accommodates an existing industrial use, or where the site previously accommodated industrial uses, <del>the proposal must</del> <u>proposals should aim to</u> provide for an increase in industrial floorspace across the EUIA as a whole.	As a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. Wandsworth's Employment Land and Premises Study (ELPS) 2020 identifies a need for a net requirement of 8.6 ha of industrial land, which is derived from an identified need of 5.5 ha for core industrial uses, up to 2.1 ha of land for waste requirements, and 1 ha of land to meet the additional surplus land to enable efficient churn of occupiers. As such, successful industrial areas, such as within the Central Wandsworth Economic Use Intensification Area (EUIA), within which the Ferrier Street area is located, are identified within the Plan as holding the potential to realise this need. This is considered to be consistent with the NPPF's requirement, set out in paragraph 81, that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" and to "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period".	No changes to the Local Plan are considered necessary.
	& the Callington Trust  Callington Estates Ltd	Alex Smith	Simply Planning Ltd	1389	Policy LP38	See attached the representation which goes into detail as to why 53 Lydden Road should be a EUPA.	The Council's Employment Land and Premises Study 2020 (ELPS) has identified a net requirement for 8.6 hectares of industrial land up to 2034. The suitability of the Borough's Locally Significant Industrial Areas (LSIAs) was considered as part of the Employment Land and Premises Study (ELPS), which found that "to ensure that the Borough can meet its demand over the plan period, this study recommends that the Council maintain the protection of all SIL and LSIAs in the Borough". The Council agrees with this recommendation, and does not seek to re-designate this area.  It is recognised that, as a result of the Secretary of State's Directions, the requirement for 'no net loss' with respect to industrial floorspace capacity was removed from the London Plan; however the same Direction required the addition of a new paragraph (6.4.6) which states "Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence", which was accepted by the Mayor of London. This approach set out within the draft Local Plan is considered to be consistent with the that required by the London Plan.  The representation makes reference to the suitability of the site to deliver new residential development. The Council is cognisant of the need to deliver both of this; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.	No changes to the Local Plan are considered necessary.
Lockguard Ltd		Mr David	Associate DP9	1645	Policy LP38	<b>Draft Policy LP38 – Mixed Use Development on Economic Land</b>	It is agreed that there may be limited circumstances, such as for the redevelopment of the Glassmill site, where the full replacement of economic floorspace alongside other Plan priorities, such as housing, might be difficult. The policy approach is set out in order to help meet an identified need for office	Amend LP38.A.3 to state that in Focal Points of Activity, proposals should seek to 'maximise the re-provision' of office floorspace, however the requirement for the

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
		Shiels				<p>Draft Policy LP38 supports proposals for mixed use development, including residential, where it meets the criteria for the relevant economic land designation within which it is located, as set out within the Draft Policy.</p> <p>Within Focal Points of Activity (where the Site is located), Draft Policy LP38 states that proposals which would result in the existing quantum of office floorspace being fully replaced will be supported. Proposals in the Ransomes Dock Focal Point that would result in a net increase in office floorspace will normally be resisted, unless it can be demonstrated that this is required in order to support the intensification of industrial uses on the site, or where it provides for a limited amount of co-working space and/or managed workspace which meets the needs of local residents.</p> <p>Whilst the Council's position regarding any net increase of office floorspace in Focal Points of Activity is supported, it is considered that any requirement for development to reprovide the existing quantum of office floorspace within Focal Points of Activity is not fully consistent with Part C of Draft Policy PM9, which states that the Council will promote residential-led development on sites located within a Focal Point. In some instances, particularly where an existing site solely in office use is being brought forward for residential-led redevelopment in line with Draft Policy PM9, the ability to reprovide the entirety of the existing quantum of office accommodation, alongside a substantial quantum of residential floorspace (whilst having regard to the policy requirement to provide onsite affordable housing) is not feasible. Draft Policy LP38 should therefore be revised to state that a reduction in existing office floorspace may be acceptable where it can be demonstrated that the existing quantum of office floorspace cannot be reprovided in full onsite as part of a mixed use development.</p>	<p>floorspace, however recognising that Focal Points of Activity are not in the highest order of preferential locations for such development (as per Part B of LP 36, Promoting and Protecting Office Floorspace), it is considered appropriate to permit flexibility around the redevelopment of office locations within Focal Points of Activity.</p>	<p>replacement of industrial uses (and support for their intensification) should be retained.</p>
Mr Robert Arguile	Chair The Putney Society			337	Policy LP39	There are very few locally.	Comments noted.	No changes to the Local Plan are considered necessary.
Kin Development		Ben Ford	Director Quod	1049	Policy LP39	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Chapter 18 Building A Strong Economy</b></p> <p><b>Policy LP39 (Railway Arches) - OBJECT</b></p> <p>The future use of Railway Arches is an important objective that Kin supports. It is unclear however what is meant to "non-economic uses". It would assist if the supporting text could confirm that economic uses include food and beverage, and leisure uses.</p>	<p>Economic uses are defined in the Glossary as "office, research and development, light industry, general industry, storage and logistics/distribution, and appropriate sui generis uses that relate to and support the industrial nature and operation of an area, such as transport depots, waste processing sites, vehicle sales showrooms, and builders' yards and merchants." For the purposes of part A.4, non-economic uses are therefore anything that falls outside of these uses, and would not include food and beverage or leisure uses.</p> <p>It is recognised that an ambition of the Wandle Delta Masterplan SPD is to encourage the reinvigoration of railway arches as part of the comprehensive regeneration of adjoining sites, recognising that within the scope of this redevelopment area these typologies have the potential for a range of activities, including workspace alongside other commercial activities and a broader strategy of public realm and connectivity improvements. While many railway arches are located within economic use designations for which the protection and promotion of such uses should remain the priority, to support this ambition, it is appropriate for the Local Plan to permit greater flexibility within this area for a broader range of commercial uses in railway arches - as long as the intention of the policy designation (e.g. the full replacement of economic floorspace or the intensification of economic floorspace) can be realised on the site, and that any proposed main town centre use can be demonstrated to protect the viability and vitality of adjacent centres and parades.</p>	<p>Add an additional clause to Part A to identify that, within the Wandle Delta Masterplan SPD area, while the use of railway arches for economic functions remains the priority, a broader range of commercial uses will be permitted, as long as the intention of the policy designation can be realised on the wider site, that the uses are consistent with relevant site allocations and/or the SPD, and that any proposed main town centre use can be demonstrated to protect the viability and vitality of adjacent centres and parades.</p>
Covent Garden Market Authority		Mr Philip Robin	Consultant Jones Lang Lasalle	1095	Policy LP39	<p>Policy LP39</p> <p>CGMA supports Policy LP39 that protects the railway arches adjacent to NCGM to support or complement the wholesale retail function of the market and the explanatory text at paragraph 18.70 that recognises it may be appropriate to introduce some wider town centre uses within the arches toward the north eastern tip of the market, to contribute to the vibrancy and vitality of this part of the reconfigured market.</p>	Support noted.	No changes required.
VSM Estates	VSM Estates	Freya Turtle	Associate Director	1067	Policy LP39	<b>For full context, see the attachment with comment 1058</b>	It is agreed that the policy should state that this refers to the arches 'immediately' adjacent to the functioning market, rather than the site, are helpful. Please note that further detail is provided on this within the supporting text in paragraph 18.70.	Amend LP39.A.3 to refer to the railway arches 'immediately' adjacent to the

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
			Turley Associates			<p>Policy - LP39 Railway Arches</p> <p>London Plan conformity - No comment.</p> <p>NPPF: positively prepared - No comment.</p> <p>NPPF: justified - Policy LP39 states that the railway arches adjacent to NCGM should be protected for wholesale retail purposes –as above it should be made explicit that this applies to those arches immediately adjacent to the wholesale market.</p> <p>For the other arches near to the NCGM site, VSM considers that a range of commercial (Use Class E)and appropriate sui generis uses should be permitted –this will allow for flexibility particularly in the current economic climate.</p> <p>It is noted that LB Lambeth has a draft railway arches policy (ED6)in its emerging new Local Plan, which states “the use of railway arches within London Plan Opportunity Areas and major district and local centres for commercial, business, service, leisure and community uses and appropriate sui generis uses will be supported...”.LB Lambeth’s New Local Plan has undergone Examination and the current policy wording reflects what has been published as proposed Modifications by the Inspector. The railway arches in the Nine Elms area fall within the same wider Vauxhall, Battersea and Nine Elms Opportunity Area that straddles both LB Wandsworth and LB Lambeth. It is considered appropriate and robust that railway arches within the same Opportunity Area should be treated the same across both authority boundaries.</p> <p>In light of the above, it is recommended that as a minimum part A.1. of the draft policy LP39 is amended to state “the use of railway arches within town and local centres, the CAZ (excluding the Queenstown Road, Battersea SIL area) <u>and London Plan Opportunity Areas</u> for town centre uses (including business, retail, community, leisure and appropriate sui generis uses) and distribution uses (B8) will be supported...”. Part A.3. of the same policy should also be amended as follows “the use of railway arches <u>immediately</u> adjacent to the <u>functioning</u> New Covent Garden</p> <p>Market site will be required to support or complement the wholesale retail function of the market.”</p> <p>NPPF: effective - No comment.</p> <p>NPPF: consistent with national policy - No comment.</p> <p>Suggested amendments to policy - The railway arches should be protected for a mix of commercial or employment uses (not wholesale market uses) and the policy worded should be amended as recommended above.</p>	<p>It is not necessary to include to London Plan Opportunity Area within LP39.A.1, as there is only a very small area of the VNEB OA that is not coterminous with the CAZ, which is predominantly residential in nature. The policy approach as set out is considered consistent with the ambitions of the VNEB OAPF, and sensible in the context of Lambeth's - who have not raised any concerns on this matter. Further, it is also noted that such an approach is not necessarily appropriate for other nascent Opportunity Areas, such as at Clapham Junction. For a point of clarification, reference to the Queenstown Road, Battersea SIL can be removed from this clause, as there is no overlap with the CAZ.</p> <p>That notwithstanding, the inclusion of reference to the suitability of 'community uses' within railway arches in the town/local centres and the CAZ is appropriate, and indeed recognising that these serve local provision, the suitability of community uses should also be acknowledged in LP39.A.4 (for 'all other location'). Inclusion of certain appropriate 'sui generis' uses is also acceptable.</p>	<p>functioning NCGM, rather than the site. This should also be reflected in LP37.</p> <p>Amend LP39.A.3 to further state that the use of the railway arches adjacent to the rest of the NCGM site should support the creation of the Food and Horticultural Quarter as set out in the Nine Elms Cultural Strategy, reflecting the connectivity and placemaking role that these locations will perform. Update the supporting text accordingly.</p> <p>Amend LP39.A.1 to include reference to certain 'sui generis' uses being appropriate as well as B2 uses in town centres and the CAZ. This should also explicitly identify the suitability of community uses.</p> <p>Amend LP39.A.4 to include reference to the support for the use of railway arches for community uses in all other locations.</p>
The Arch Company	The Arch Company	Alex Christopher	Director Turley Associates	1559	Policy LP39	<p><b>See attachment on comment 1556 for full context and graphics</b></p> <p><u>Draft Policy LP39(Railway Arches)</u></p> <p>The Council recognises that the borough benefits from a “good supply of railway arches which accommodate a range of economic uses”,including industrial, economic and/or storage and distribution uses, but also wider town centre uses in appropriate locations. Railway arches can therefore cater for a wide range of users and uses and assist LB Wandsworth in achieving its ambition of building a strong economy. Our client agrees with the Council’s interpretation that railway arches can accommodate a broader mix of use s “that contribute to the vitality and vibrancy of the area, and which promote resilience through introducing a diversity of uses”(para. 18.70).</p> <p>The Arch Company therefore supports the flexible wording of Draft Policy LP39which encourages new development and, where required, the re-</p>	<p>With respect to LP39.A.1: it is agreed that, particularly following amendments to the Use Class Order in England, certain sui generis uses would be appropriate in railway arches located in town centres and the CAZ. It is noted that the majority of these uses would be expected to fall within the category of 'town centre' uses, which is already identified, however it is considered appropriate to add this wording as clarification.</p> <p>With respect to LP39.A.2: it is agreed that the flexibility introduced by LP37.B - which identifies exceptional circumstances in which uses identified in LP37.A would be permitted - is not sufficiently referred to in LP39.A.2. It is sufficient to simply refer the latter to LP37 (rather than LP37.A). Reference to 'sui generis' in LP37.A.9 is to industrial sui generis uses, rather than 'other' uses, which are specified in more detail in LP37.B.4. The inclusion of 'other' within the policy wording of LP37.A would potentially cause confusion.</p> <p>LP39.A.2 refers exclusively to the 'strategic reservoir of industrial land', which is defined as the SILs and LSIs only. It is agreed, however, that a new clause should be added to the policy to specify the appropriateness for non-industrial</p>	<p>Amend LP39.A.1 to include reference to certain 'sui generis' uses being appropriate as well as B2 uses in town centres and the CAZ.</p> <p>Amend LP39.A.2 to refer to LP37, rather than LP37.A.</p> <p>Add a new clause specifying that that in the Wandle Delta Masterplan SPD area, railway arches should be prioritised for economic uses; however other commercial uses will be acceptable where the policy requirements for the replacement or intensification of economic floorspace can be better accommodated elsewhere on the site, the approach is consistent with guidance set out in the relevant site allocation and/or SPD, and it can be demonstrated that town centre uses</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>purposing of the borough's railway arches in order to optimise their use. In relation to Part A(1), our Client agrees that <u>a mix of town centre and (particularly) storage and distribution uses</u> should be supported in town and local centres and the CAZ, but considers that in order to increase flexibility going forward the remainder of the policy wording should be amended to include potential sui generis uses subject to those not causing harm to the amenity of users of adjoining sites or neighbouring uses and state "Certain <u>sui generis and/or B2</u> uses, such as microbreweries, will be supported in these locations [...]".</p> <p>In relation to Part A(2), The Arch Company agrees that within the borough's strategic reservoir of industrial land only industrial uses should be supported (as set out in Draft Policy LP37, Part A). However, both Draft Policies LP37 Part A and LP39 should recognise that there are certain uses within LSIS or SIL that support its day-to-day operation. To safeguard those uses (new or existing), Draft Policy LP37 Part A(9) may therefore be amended –in line with what is recognised in Para. 18.39 –to state: "Sui generis <u>and/or other</u> uses that relate to, and support, the industrial nature and operation of the area". Some of those supporting uses may certainly be located in railway arches.</p> <p>Part A(2) of the draft policy will also benefit from reference to Draft Policies LP37 Parts C &amp; D and/or LP38 to ensure that where railway arches within designated industrial land form part of a wider Masterplan for a mixed-use redevelopment they may be able to accommodate alternative (non-industrial) uses.</p> <p>Part A(3) specifically relates to the railway arches adjacent to New Covent Garden Market which are required to support or complement the wholesale retail function of the market and are of specific interest to our Client as long-term leaseholder. Whilst we are in agreement that those railway arches can play an important role in the day-to-day operation of the market, it is considered that a restriction on the occupation of those arches in relation to the wider wholesale retail function is not justified and results in a conflict with the policy's overall ambition to ensure that railway arches promote resilience through a range of economic, commercial and leisure uses. As such, we recommend that Part A(3) is amended to reflect that it is the Plan's ambition to ensure that the railway arches immediately adjacent to the market support or complement a wholesale retail function, but that alternative uses can include those outlined within Part A(1) of the draft policy.</p> <p>Part A(4) requires that in all other locations the arches shall accommodate economic uses unless evidence can be provided that a full and proper marketing exercise of the site has been undertaken for a period of at least 18 months in line with the requirements set out in Appendix 1 (marketing requirements). Whilst the Council's intentions are acknowledged, it should be reflected (in the supporting text if necessary) that marketing exercises in relation to comparable arches, similarly under control of the same landowner/leaseholder and/or in the immediate vicinity, will be deemed acceptable. For instance, where it is the case that in a row of arches that are of a uniform nature, one or more may have been subject to extensive marketing meeting the above requirements, but another one becomes vacant, the marketing evidence obtained for adjacent/nearby arches (where comparable) should be sufficient allowing a timely re-occupation of the arch for an alternative use where it has been demonstrated that there is no demand for the existing (or an alternative economic) use. Such an approach will ensure that the policy is both flexible and responsive in respect of the impacts of the COVID-19 pandemic.</p> <p>In relation to Part B Biodiversity, it is important to note that this should only apply to open and/or vacant railway arches rather than all railway arches (including those completed and/or previously/currently occupied). Due to the nature of many converted and occupied railway arches (which are similar to many other commercial and/or employment uses), it is not deemed to be justified that this policy wording simply applies to all proposals relating to the use of the respective arch. The relevant wording of the policy should therefore be amended to state: "Where a proposal involves</p>	<p>uses where replacement and/or intensification is required and achieved elsewhere on the site through a masterplanned approach. This would only apply in the Wandle Delta SPD area, and not within all areas identified within LP37.C and LP38 - which are addressed by LP39.4.</p> <p>With respect to LP39.A.3, it is agreed that the policy should state that this refers to the arches 'immediately' adjacent to the market. Please note that further detail is provided on this within the supporting text in paragraph 18.70. This remains the Council's expectation, and any deviation from this policy would need to be justified and addressed through the development management process.</p> <p>With respect to LP39.A.4: it is agreed that marketing exercises that have been done for arches in the immediate vicinity will be deemed acceptable, if these have been undertaken at a comparable timescale. This will help to provide greater flexibility of use, including in response to the pandemic; however it is noted that the borough's evidence suggests demand for economic functions over the Local Plan period, and therefore any issues over vacancy are likely to result from site-specific conditions. For this reason, marketing evidence for arches under control or the same landowner/leaseholder (but potentially in a different location, with different access arrangements) is not considered acceptable.</p> <p>With respect to LP39.B: it is agreed that this requirement should only apply to open and/or long-term vacant railway arches.</p> <p>With respect to paragraph 18.69: it is agreed that that text should be clarified to refer to market rents being at or below market average due to their non-prime locations, to align with the London Plan, paragraph 6.2.4.</p>	<p>would not harm the vitality or vibrancy of designated centres or parades through the application of a sequential test.</p> <p>Amend LP39.A.3 to refer to the railway arches 'immediately adjacent' to NCGM. This should also be reflected in LP37.</p> <p>Amend LP39.A.3 to further state that the use of the railway arches adjacent to the rest of the NGCM site should support the creation of the Food and Horticultural Quarter as set out in the Nine Elms Cultural Strategy, reflecting the connectivity and placemaking role that these locations will perform. Update the supporting text accordingly.</p> <p>Add a new section to Appendix 1 (Marketing Requirements) to specify that marketing evidence provided for a comparable arch in the immediate vicinity will be acceptable if this is consistent with the required timescales.</p> <p>Amend LP37.B to specify that this requirement only applies to 'open and/or vacant' railway arches.</p> <p>Amend paragraph 18.69 to clarify this refers to market rents, which are available at or below market average due to their non-prime locations.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>the use of <u>open and</u> long-term vacant railway arches, evidence will need to be submitted which demonstrates that any existing biodiversity value will not be harmed by the use or that appropriate mitigation measure will be provided in line with Policy LP 57 (Biodiversity)."</p> <p>In relation to supporting para. 18.69, a number of railway arches may offer low-cost business space, however, these market levels are reflective of their (often) non-prime locations (as acknowledged in para. 6.2.4of the Publication London Plan). It will be important to avoid a misconception in this area with wider policies in the Draft Local Plan (i.e. Draft Policy LP41 Affordable, Flexible and Managed Workspace).</p>		
Mr Robert Arguile	Chair The Putney Society			338	Policy LP40	These are all reasonable proposals.	Support noted.	No changes required.
Kin Development		Ben Ford	Director Quod	1050	Policy LP40	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Policy LP40 (Requirements for New Economic Development) - OBJECT</b></p> <p>The future use of Railway Arches is an important objective that Kin supports. It is unclear however what is meant to "non-economic uses". It would assist if the supporting text could confirm that economic uses include food and beverage, and leisure uses.</p>	Comment refers to Policy LP 39, and appears to be an erroneous duplication. See response to comment # 1049.	No changes required.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1135	Policy LP40	<p><u>LP40 Requirements for New Economic Development</u></p> <p>The policy sets out requirements for new economic development to achieve a high standard of workspace which is supported. However, the policy is currently too prescriptive in relation to requirements for industrial uses which should be managed by market requirements that are constantly changing. It is therefore suggested that the following amendments are made to the wording:</p> <p>LP40 Requirements for New Economic Development</p> <p>B.In addition to the requirements in Part A, proposals for industrial uses <del>must</del> ensure <u>should seek to provide</u>:</p> <ol style="list-style-type: none"> <li>1. the provision of adequate servicing and loading facilities including access bays and service yards;</li> <li>2. floor to ceiling heights of 3.35 metres (or as appropriate to the specific use, where this can be justified);</li> <li>3. that sufficient space is provided on site for the servicing and parking of commercial vehicles; and</li> </ol> <p>goods lifts for multi-storey developments, with a minimum loading of 500kg.</p>	The intention of the policy is to ensure that new development is able to meet the long-term needs of industrial operation, including those of potential future users. It is recognised, however, that different users will have varying requirements for their buildings / business operations, and that such specifications may change in response to technological advances. It is agreed that the policy requirement should be amended to allow for a potential departure for these requirements, where this can be justified and it would not negatively impact the long-term industrial function of the site.	Amend Policy LP 40.B to allow for a potential departure for these requirements, where this can be justified and it would not negatively impact the long-term industrial function of the site.
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1732	Policy LP40	<p><u>LP40 Requirements for New Economic Development</u></p> <p>The policy sets out requirements for new economic development to achieve a high standard of workspace which is supported. However, the policy is currently too prescriptive in relation to requirements for industrial uses which should be managed by market requirements that are constantly changing. It is therefore suggested that the following amendments are made to the wording:</p> <p>LP40 Requirements for New Economic Development</p>	The intention of the policy is to ensure that new development is able to meet the long-term needs of industrial operation, including those of potential future users. It is recognised, however, that different users will have varying requirements for their buildings / business operations, and that such specifications may change in response to technological advances. It is agreed that the policy requirement should be amended to allow for a potential departure for these requirements, where this can be justified and it would not negatively impact the long-term industrial function of the site.	Amend Policy LP 40.B to allow for a potential departure for these requirements, where this can be justified and it would not negatively impact the long-term industrial function of the site.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>B. In addition to the requirements in Part A, proposals for industrial uses must ensure <u>should seek to provide</u>:</p> <ol style="list-style-type: none"> <li>1. the provision of adequate servicing and loading facilities including access bays and service yards;</li> <li>2. floor to ceiling heights of 3.35 metres (or as appropriate to the specific use, where this can be justified);</li> <li>3. that sufficient space is provided on site for the servicing and parking of commercial vehicles; and</li> </ol> <p>goods lifts for multi-storey developments, with a minimum loading of 500kg.</p>		
Mr Robert Arguile	Chair The Putney Society			339	Policy LP41	<p>Most of this has probably been overtaken by the new Use Class E.</p> <p>LP41.C Affordable, flexible and managed workspace for SMEs would be welcome in Putney town centre.</p>	Policy LP 41 (Affordable, Flexible and Managed Workspace) applies to all appropriate economic uses (defined as being office and industrial uses), irrespective of the Use Class within which they fall. The policy would therefore continue to apply for economic uses which fall under Class E, such as offices and industrial processes which could be carried out in any residential area without causing detriment to the amenity of the area.	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee Battersea Society			824	Policy LP41	<p><b>LP41 Affordable, Flexible and Managed Workspace</b></p> <p>This section should include specific reference to the Borough's policy for new mixed-use work/shared living facilities such as the Collective in Chatfield Street and the proposal put forward for Haydon Way. There should be a direct link to any complementary policy to that set out in <b>LP31C</b></p>	Where such developments are providing dedicated economic floorspace (for example, as a distinct component), these would be subject to the thresholds and requirements set out within Policy LP 41. It is considered helpful to clarify that ancillary provision of economic floorspace through such shared living facilities should be accessible to members of the public during normal operating hours to provide a greater array of working options for the borough's residents.	Add a sentence within the supporting text to clarify that economic provision as part of shared living facilities should be accessible to member of the public during normal working hours.
Cllr Graeme Henderson and Cllr Rigby	Cllr Earlsfield Labour Party			932	Policy LP41	<p>The Local Economy</p> <p>LP 41 &amp; 42</p> <p>Earlsfield has a large number of industrial estates providing high levels of employment and economic activity. We wish for that to continue, but are concerned that some of the estates are run down e.g. Bendon Valley and Lydden Rd and will decline over the period of the revised Local Plan unless action is taken to enable them to develop modern, light industrial and commercial units suitable for the 21st Century.</p> <p>Para 1.54 of the existing Plan refers to "re-designating some sites that are underutilised for mixed uses, enabling the proposed "Workspace" development of part of the Riverside Industrial Estate to be made. The building of modern, light industrial units on this site will further exacerbate the decline of the adjacent remaining part of the estate, comprising Bendon Valley and Lydden Rd. We believe this should also be considered for limited mix use development, provided that existing industrial and commercial capacity on the site is maintained.</p> <p>We also require a consistent approach. A proposed development between Penwith and Thornsett Rd was rejected because it would reduce the quantity of industrial and commercial premises, yet that is effectively what has happened in relation the 'Workspace' development, which was facilitated by a re-designation of the area.</p>	<p>The Council's Employment Land and Premises Study (ELPS) 2020 forecast a net requirement for 8.6 hectares of industrial land up to 2034. This assessment is based on the requirement for an anticipated 5.5ha of land required to accommodate demand for core industrial uses (predominantly derived from a demand for storage and distribution uses falling within use class B8 – of 4.7ha), as well as up to 2.1ha of land which will be needed to accommodate additional demand for waste uses. A further 1ha of the overall identified demand is required to ensure that the borough has an optimal amount of frictional vacancy to enable the efficient churn of occupiers.</p> <p>As part of the ELPS study, stakeholders from the Lydden Road area were invited to participate in a workshop and to submit information to assist with the study. That information was carefully considered at the time of the study, and is accounted for within its conclusions. The study recommended that employment land within the designated SILs and LSIA remains the most suitable locations in Wandsworth to accommodate the additional demand identified for both core industry/warehousing uses and waste uses. This approach is taken forward within the draft Local Plan. Policy LP 37 (Managing Land for Industry and Distribution) sets out the protection of land and premises for industrial uses, including 'secondary materials, waste management and aggregates', within a strategic reservoir of industrial land that is comprised of the borough's SILs and LSIA. Policy LP 13 (Waste Management), Part D specifies that new waste capacity is directed towards existing facilities, safeguarded wharves and SIL and LSIA. It is important to recognise that the policy intention is to protect land in order to meet future need, and the sites are not therefore necessarily allocated for redevelopment in the immediate or shorter-term. This is considered to be consistent with the NPPF, paragraph 82, which requires that planning policies should "set criteria, or identify sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period", as well as the London Plan, paragraph 6.4.6, which states that "where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence".</p> <p>Due to both the quantum and the nature of the identified demand – relating predominantly to storage and distribution uses and land for waste uses – the Council does not consider that it is appropriate to introduce non-industrial uses into the borough's already constrained strategic reservoir of industrial land, including the Lydden Road Locally Significant Industrial Area (LSIA). Necessary outputs and requirements for such industrial activity, including noise, odours, emissions, traffic and the requirement for operation across a 24-hour period, among other factors, mean that the co-location of the above uses alongside non-industrial uses (and residential in particular) is anticipated to result in conflicts arising between the two, which would likely harm the operation and limit the</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>capacity of industrial uses – as well as creating sub-optimal conditions for housing and/or office development.</p> <p>In promoting the co-location of re-provided and/or industrial uses through mixed use development, the representation invites the provision of additional housing and office development in this location. The Council is cognisant of the need to deliver both of these; however the Local Plan sets out an approach to do so that does not require capacity to be realised in this location. The Council's Housing and Economic Land Availability Assessment, which forms part of the evidence base informing the Local Plan, identifies that there is sufficient capacity both to accommodate the London Plan 10-year housing target of 19,500 new dwellings, and to meet the identified need for office floorspace in the local / sub-regional market (of 22,500 sqm) up to 2033/4. These needs, moreover, can be met in locations that are preferential and/or strategically more appropriate for such uses than within the borough's designated strategic reservoir of industrial land.</p> <p>The representation made reference to the redesignation of adjacent land, now within the Bendon Valley EUIA, as precedent for the potential redevelopment of the Lydden Road LSIA. This designation does permit the co-location of different uses, however the context for this redesignation was notably different, both with respect to the existing uses on site (including significant car parking and a disused trampoline centre), and to the scope and typology of identified industrial need when that re-designation was made. Furthermore, it is noted that while the scheme realises an intensification of the existing industrial uses, these are primarily realised as light industrial units, rather than units suitable for the storage and distribution uses which, as identified above, are driving the demand for industrial floorspace. The site is yet to be developed and it will be important for the Council to monitor the efficacy of the co-located uses in practice, as well as its impact of industrial units within the adjacent area (e.g. Lydden Road). It is not considered that this development will necessarily exacerbate the decline of these units, as businesses within the borough require a range of premises available at different rental levels, and – as above – for different economic functions.</p> <p>The representation also made reference to appeal decisions at 150a-170 Penwith Road and 2-8 Thornsett Road, London SW18 4AQ (refs: APP/H5960/W/323560 and APP/H5960/W/19/3235608). The Council is cognisant of this decision, and has taken this into consideration in drafting the new Local Plan. It is noted that the Inspector took consideration of the "very close proximity to Earlsfield centre" as part of his assessment for whether the introduction of other uses (A1, B1a and C3) was appropriate, noting it as a sequentially acceptable location for the retail and office provision and a highly sustainable location for the proposed residential units. The Council do not consider that these apply as readily in the instance of sites in Lydden Road, and at any rate are reluctant to further constrain the borough's already limited strategic reservoir of industrial uses.</p> <p>For these reasons, the Council does not consider that the suggested amendments are appropriate for the LSIA.</p>	
Kin Development		Ben Ford	Director Quod	1051	Policy LP41	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Policy LP41 (Affordable, Flexible and Managed Workspace) - OBJECT</b></p> <p>It is unclear what is meant by "cultural workspace". It would assist if the supporting text could clarify what is meant by this term.</p>	<p>A definition for cultural industries is included within the Local Plan. It is agreed, however, that a more suitable requirement of Part C of the policy would be for the provision of 'specialist workspace', rather than 'cultural workspace', which relates the policy requirement to the preceding text, and offers more flexibility in how this is delivered.</p> <p>To assist with clarity, definitions of creative clusters, creative quarters, cultural anchor spaces / tenancies have been added. The definition for cultural industries has been expanded to include cultural activities, and has been revised.</p>	<p>Amend Part C to refer to 'specialist workspace', rather than 'cultural workspace'.</p> <p>Add to the glossary definitions for creative clusters, creative quarters, cultural anchor spaces / tenancies. Amend the definition for creative industries and cultural industries.</p>
Dr David Curran	Lavender Hill for Me			1174	Policy LP41	<p>LP41 Affordable, Flexible and Managed Workspace</p> <p>No comment other than to generally support these proposals. The differential treatment of smaller (sub-1000 sqm) and larger workspaces seems appropriate.</p>	Support noted.	No changes required.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1136	Policy LP41	<p>LP41 Affordable, Flexible and Managed Workspace</p> <p>In the experience of Workspace, the provision of affordable workspace has been most efficient where the applicant is given the opportunity to manage the space directly and flexibility is provided to decide on the location of the affordable workspace post-determination.</p> <p>The option to provide affordable workspace as managed or open workspace is supported in general. It is noted that the supporting text to the policy states that if an applicant wishes to manage the space themselves, they will need to demonstrate how they will meet the requirements of Policy LP 41 (Affordable Workspace), and how they will accommodate the features of managed workspace set out above.</p> <p>It is suggested that the wording of the policy should be amended as follows to introduce a workspace management plan to be secured by condition where details including the operation and location of managed workspace can be provided post-submission to provide further flexibility through the detailed design stage of development.</p> <p>LP41 Affordable, Flexible and Managed Workspace</p> <p>Provide a proportion of 'open workspace', equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater), <u>with details provided through an Affordable Workspace Management Plan secured by condition</u>, which includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro- and small-businesses, especially early stage businesses; or</p>	Support noted. It is agreed that it is helpful to state that the provision of managed workspace should be secured by condition, which should be added to the policy wording.	Amend LP41.B to clarify that details relating to the provision of managed workspace should be secured by condition and set out within an Affordable Workspace Management Plan. The supporting text should be amended to reflect this change.
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP	1231	Policy LP41	<p><b>See attachment for full context and associated images on comment 1224</b></p> <p><b>Policy LP41 Affordable and Managed Workspace</b></p> <p>Policy LP41 Affordable and Managed Workspace requires "all development that provides economic floorspace to contribute to the provision of affordable, flexible and managed workspace, in perpetuity, which will be secured through S106 planning obligations and/or conditions". For developments of over 1,000 sqm, Policy LP41 expects developments to provide a "proportion of 'open workspace', equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater)" or to "provide a proportion of economic floorspace at an affordable rent, in perpetuity to scheme viability." Where affordable workspace is to be included in the VNEB OA, where Battersea Studios is located, the policy states that "at least 10% of gross economic floorspace must be provided at a capped rate of 50% less than the prevailing market rate for comparable premises".</p> <p>Policy EI 4 of LBW's Employment and Industry Local Plan Document (adopted December 2018) states that sites within Nine Elms would be expected to "provide affordable workspace at a significantly reduced rental rate subject to negotiation, depending on the location, size and type of premises".</p> <p>The Policy LP41 requirement for a capped rent of 50% in the VNEB OA represents a significant change from the previous 20% capped rate in adopted and draft policy. Whilst a 50% reduction in rent may be appropriate in new development located further north in the VNEB OA, closer to the Battersea Power Station regeneration or closer to Vauxhall Station, it is not appropriate for the scale and type of office space offered on the BDTQ area, where rents are lower than the rest of the opportunity area and viability of projects would be significantly impacted.</p> <p>Schroders proposes that draft Policy LP41 should be amended to differentiate the BDTQ from the remainder of the VNEB OA, and should require a 20% capped rate for new affordable workspace within the BDTQ. This approach has been taken in the draft Policy ED2 Affordable Workspace in the London</p>	<p>The approach set out within LP41 is based on recommendations made within the Employment Land and Premises Study, which specifically identifies the suitability of the BDTQ area for the provision of affordable workspace, stating (paras 8.55-8.56): "the Council should therefore explore options for providing affordable workspace in these locations in order to maximise the delivery, including in the Battersea Design and Technology Quarter in the Queenstown Road SIL ... For affordable workspace to work in these areas, the discount on rent will need to be substantial considering that market rents, though not at the level they are in the VNEB OA itself, are high".</p> <p>The ELPS further reviewed Lambeth's approach to affordable workspace. While Policy ED2 of the revised Lambeth Local takes a geographically specific approach to affordable workspace, developments in the Waterloo/Southbank and Vauxhall area - that most proximate and equivalent to the BDTQ area - requires that 10% of floorspace in office developments over 1000sqm are provided at 50% of market rents for a period of 15 years.</p> <p>This approach has been considered as part of the Whole Plan Viability assessment.</p>	No changes considered necessary for the Local Plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Borough of Lambeth Draft Revised Local Plan (January 2020), where the proposed capped rent rate is broken into smaller sub-areas to reflect a range in rental values across the borough.		
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1215	Policy LP41	<p><b>Policy LP41 Affordable, Flexible and Managed Workspace</b></p> <p><i>We will seek to provide a wide range of employment generating uses as part of any future redevelopment proposal. However, the lack of flexibility of the taxation proposed in the current draft Policy LP41 has the potential to discourage the inclusion of economic floorspace as part of any future redevelopment proposal.</i></p> <p><i>Policy LP41 states:</i></p> <p>"1. Developments that would provide less than 1,000 sqm of economic floorspace will be expected to provide a range of unit sizes, unless a specific end user has been identified and that there is sufficient certainty regarding their occupation at the time of submitting the application, or if the proposed development is for a co-working space (or similar 'open workspace' models).</p> <p>2. Developments that would provide more than 1,000 sqm of economic floorspace will be expected to:</p> <p>3. Provide a proportion of 'open workspace', equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater), which includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro-and small-businesses, especially early stage businesses, subject to viability; or</p> <p>4. Provide a proportion of economic floorspace at an affordable rent, in perpetuity, subject to scheme viability as follows:</p> <p>5. Development in the VNEB OA: at least 10% of gross economic floorspace must be provided at a capped rate of 50% less than the prevailing market rate for comparable premises.</p> <p>6. Development in the Wandle Valley: at least 10% of gross economic floorspace must be provided at a capped rate of 25% less than the prevailing market rate for comparable premises.</p> <ul style="list-style-type: none"> <li>Development in all other locations: at least 10% of gross economic floorspace must be provided at a capped rate of 20% less than the prevailing market rate for comparable premises.</li> </ul> <p>3. The redevelopment of existing affordable, flexible and managed workspace must re-provide the maximum viable quantum of such employment floorspace in perpetuity, at equivalent rents (taking into account service charges). These should be suitable for the existing or equivalent uses, subject to current lease arrangements and the expressed desire of existing businesses to remain on-site (see LP 40, Part F). For sites over 1000 sqm, where this re-provision would result in less floorspace than is provided under Part B.2, additional provision to at least this amount is required."</p> <p><i>We are committed to ensuring the future success and vitality of the Town Centre. However, it is imperative that viability is taken into account within this policy wording.</i></p>	These requirements would be subject to scheme viability. Reference to this is included in Part B.2.b, with reference to the provision of a proportion of economic floorspace at an affordable rent; however it is agreed that this would be applied to parts 2. a and b.	Amend Policy LP41.B.2. such that the caveat 'subject to scheme viability' refers to both parts a and b.
Safestore		Matthew Lloyd Ruck	Planner Savills	1388	Policy LP41	<p><b>See attached to comment 1382 the full representation for context</b></p> <p><b>Affordable, flexible and Managed workspace – LP41</b></p>	It is recognised and agreed that certain storage and distribution uses, particularly those which require a single large-floorplate operated by one user, may not easily be sub-divided either to provide open/managed workspace or affordable workspace. In such circumstances, where this can be clearly demonstrated, the Council would consider disapplying the requirements of LP41.B.	Add a new paragraph to the supporting text to clarify that the Council may choose to disapply the policy requirement set out in Part B (of the Regulation 18 version) for large-floorplate storage and distribution uses falling

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Safestore encourage the provision of facilities and resources that support the success of a diverse range of businesses to grow without being unfairly constrained by the size and cost of their premises. It is our view that affordability is achieved through a range of measures including the specific product, and flexible terms of occupation, which is currently offered by the existing Safestore self-storage unit and business centre at Ingate Place.</p> <p>LP41 is currently ineffective when applied to B8 storage and distribution units. Proposing a prescriptive 10% affordable workspace target is counter-productive to the operation of a self-storage site, which due to the nature of their operations, typically need guaranteed security of their premises in order to operate.</p> <p>For example, a self-storage centre requires the ground floor area to be available for easy to access storage and because of this, the ground floor space is often the most commercially valuable element of that form of development, meaning that some self-storage business models may be reliant upon the ground floor space being dedicated solely to their operation. It may therefore be unviable for many self-storage operators to relinquish the ground floor space to external affordable workspace operators.</p> <p>It would not be practical to provide affordable workspace on upper floors due to the requirement of installing lifts and separate stair cores and lobbies to make them accessible and separate units. This would reduce the total ground floor area for the B8 storage units, rendering them unviable.</p> <p>This should also be considered in the context of Safestore's business model of providing flexible storage space. Approximately 50% of storage space across Safestore's network are occupied by businesses of which a high proportion are SMEs. In terms of B8 storage units, affordability is not just about rental price. It is about the flexibility of terms, being able to exit an agreement at short notice, take less or more space to respond to a businesses' fortunes. Self-storage units provide an affordable product through a package of flexible measures which are overlooked.</p> <p>Moreover, LP41 (D) seeks proposals to deliver affordable workspace for occupation at the same time as market accommodation. This potential to disrupt the viability and subsequent deliverability of a development proposal and we recommend this policy is removed from the draft local plan.</p> <p>For the above reasons it is considered that the policy is therefore not in line with the adopted or Publication London Plan and, is inconsistent with national policy as it is not in conformity with Paragraph 11 of the National Planning Policy Framework, which seeks to ensure plans are sufficiently flexible to adapt to rapid change.</p> <p>We would therefore suggest that the policy is amended to read the following:</p> <ol style="list-style-type: none"> <li>2. Developments that would provide more than 1,000 sqm of economic floorspace will be expected to:</li> <li>3. Provide a proportion of 'open workspace', equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater), which includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro and small businesses, especially early-stage businesses; or</li> </ol> <p>iii. Development in all other locations: at least 10% of gross economic floorspace must be provided at a capped rate of 20% less than the prevailing market rate for comparable premises, <u>where practical and viable to do so.</u></p> <p><del>Affordable workspace should be made available for occupation at the same time as, or prior to, the first occupation of the remainder of the economic floorspace in the development.</del></p>	<p>That notwithstanding, where there is provision of individual units, or where storage and distribution uses are provided alongside offices (as is common with self-storage facilities), the Council would expect the requirements of the policy to be adhered to, unless it can be demonstrated that this is not possible.</p> <p>Policy LP41.B.2.b already includes reference to 'scheme viability', however it is agreed that this should refer to both parts a and b.</p> <p>The policy requirement is otherwise not considered by the Council to contravene paragraph 11 of the NPPF, which it is noted has subsequently been updated in the most recently published version.</p>	<p>within Use Class B8, where it can be demonstrated that the sub-division of the floorspace is not practical and/or viable. It will, however, generally be applied to proposals, including for self-storage facilities, where individual units could be leased at a reduced rent or where storage and distribution uses are provided in conjunction with office facilities.</p> <p>Amend LP41.B.2 such that the caveat 'subject to scheme viability' applies to both parts a and b.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Workspace Group	Workspace Group PLC	Laura Jenkinson	Director Avison Young	1733	Policy LP41	<p>LP41 Affordable, Flexible and Managed Workspace</p> <p>In the experience of Workspace, the provision of affordable workspace has been most efficient where the applicant is given the opportunity to manage the space directly and flexibility is provided to decide on the location of the affordable workspace post-determination.</p> <p>The option to provide affordable workspace as managed or open workspace is supported in general. It is noted that the supporting text to the policy states that if an applicant wishes to manage the space themselves, they will need to demonstrate how they will meet the requirements of Policy LP 41 (Affordable Workspace), and how they will accommodate the features of managed workspace set out above.</p> <p>It is suggested that the wording of the policy should be amended as follows to introduce a workspace management plan to be secured by condition where details including the operation and location of managed workspace can be provided post-submission to provide further flexibility through the detailed design stage of development.</p> <p>LP41 Affordable, Flexible and Managed Workspace</p> <p>Provide a proportion of 'open workspace', equivalent to 10% of the gross economic floorspace and no less than 400 sqm (whichever is greater), <u>with details provided through an Affordable Workspace Management Plan secured by condition</u>, which includes a wide range of features that minimise overhead and upfront investment costs and provide business support for micro- and small-businesses, especially early stage businesses; or</p>	Support noted. It is agreed that it is helpful to state that the provision of managed workspace should be secured by condition, which should be added to the policy wording.	Amend LP41.B to clarify that details relating to the provision of managed workspace should be secured by condition and set out within an Affordable Workspace Management Plan. The supporting text should be amended to reflect this change.
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1552	Policy LP41	<p><b>See attachment in representation 1534 for context</b></p> <p>Chapter 18 Building A Strong Economy Policy</p> <p>LP41 (Affordable, Flexible and Managed Workspace) - OBJECT It is unclear what is meant by "cultural workspace". It would assist if the supporting text could clarify what is meant by this term.</p>	<p>A definition for cultural industries is included within the Local Plan. It is agreed, however, that a more suitable requirement of Part C of the policy would be for the provision of 'specialist workspace', rather than 'cultural workspace', which relates the policy requirement to the preceding text, and offers more flexibility in how this is delivered.</p> <p>To assist with clarity, definitions of creative clusters, creative quarters, cultural anchor spaces / tenancies have been added. The definition for cultural industries has been expanded to include cultural activities, and has been revised.</p>	<p>Amend Part C to refer to 'specialist workspace', rather than 'cultural workspace'.</p> <p>Add to the glossary definitions for creative clusters, creative quarters, cultural anchor spaces / tenancies. Amend the definition for creative industries and cultural industries.</p>
The Arch Company	The Arch Company	Alex Christopher	Director Turley Associates	1560	Policy LP41	<p><b>See attachment on comment 1556 for full context and graphics</b></p> <p><u>Draft Policy LP41 Affordable, Flexible and Managed Workspace</u></p> <p>Whilst our Client is generally supportive of the Council's objective to secure affordable (flexible and managed) floorspace, it is important to:</p> <p>a) Highlight that the provision of such floorspace will have to be subject to viability (especially in designated industrial land within which redevelopment projects already have to deal with significant pressures on viability; or particularly in co-location schemes and therefore affordable workspace may result in a conflict with the provision of affordable housing) –it is acknowledged that the draft policy wording achieves this under Part B(2)(b), but our Client feels strongly about reiterating that this is retained across the entire policy in order for it to be justified; and</p> <p>b) Define the term 'affordable workspace' in the Glossary of the Draft Local Plan or as part of this condition to avoid any misinterpretation and ensure that Officers and Applicants alike are familiar with its intentions, specifics and the way in which it is applied. Our client reserves the right to provide further comments on this emerging policy in the next iteration of the plan.</p>	<p>Support noted. It is agreed that it would be helpful to clarify that the caveat 'subject to scheme viability' applies to both parts a and b of LP41.B.2.</p> <p>Policy LP41 provides two options for the provision of affordable and/or managed workspaces, both of which are considered to fulfil the Council's objectives of providing workspace for start-up businesses, SMEs, and other users who through their operation require affordability features (e.g. cultural uses). It is agreed that the distinction between the provision of workspace at sub-market rents and a form of managed workspace that particularly assists with affordability (termed 'open workspace') could be better clarified within the policy wording, and the supporting text. These definitions should also be added to the Glossary, where, for purposes of clarity, the definition of affordable workspace takes forward that used in the London Plan.</p>	<p>Amend LP41.B.2 such that the caveat 'subject to scheme viability' applies to both parts a and b.</p> <p>Amend the LP41 to ensure consistency of language with regard to terminology, in particular 'open' (replacing previous references to 'managed') and 'affordable' workspace, and to better clarify the distinction between the two.</p> <p>Add definitions of affordable workspace (as per the GLA) and open workspace to the Glossary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			340	Policy LP42	Has a cost benefit analysis been done to justify this?	The policy approaches carries forward requirements that have been in place under the existing Local Plan, however for clarity these are now grouped within a single (new) policy. The requirements are based on the experience of the Economic Development Office and are informed by industry standards, where applicable. The requirements herein will also be subject to a Whole Plan Viability Assessment to ensure that they do not negatively impact on the potential for development to come forward, although it is also noted that S106 Planning Obligation agreements are subject to a negotiated process, where applicable.	No changes considered necessary for the Local Plan.
Josephine Vos	Transport for London			737	Policy LP43	TfL welcomes the protection given to safeguarded wharves, which provide important infrastructure to support the transport of goods along the river. Given the presence of the wharves, the use of river transport for construction (including removal of waste) and bulk deliveries should be secured through planning conditions or obligations for larger sites, or areas with clusters of sites, where cooperation and consolidation may be possible (e.g. Wandsworth and Nine Elms).	Support noted. The Council is supportive of the use of the river for the transshipment of materials, including in construction, and agree this would be useful to clarify.	Amend paragraph 18.96 to clarify that the use of river transport for construction (including removal of waste) and bulk deliveries should be assessed, and secured through planning conditions or obligations where appropriate.
Hassan Ahmed Hassan Ahmed	GLA			1109	Policy LP43	<p><b>Safeguarded Wharves</b></p> <p>The Mayor welcomes Wandsworth's promotion of wharf sites to support the function of moving freight by river and recognition of the Safeguarded Wharves Review 2018-2019 which was granted approval by the Secretary of State in September 2020 and recommends the ongoing safeguarding of all five of Wandsworth's wharves including Smugglers Way, Pier, Kirtling, Cringle Dock and Middle Wharves.</p> <p>The Mayor's Transport Strategy also seeks to increase the proportion of freight moved on London's waterways; retaining safeguarded wharves is a key enabler of this.</p> <p>The Mayor welcomes the commitment to the safeguarding of the borough's five wharves in the draft Plan Policy LP43. This is in line with the PLP Policy SI 15 which requires (amongst other things) boroughs to protect existing locations and to support development proposals that facilitate an increase in the amount of freight transported on London's waterways. The policy is also clear that safeguarded wharves should only be used for waterborne freight-handling use, with redevelopment for other uses only where the wharf is no longer viable. Para 9.15.6 of the PLP details an exception for strategic proposals of essential benefit for London which cannot be planned for or delivered on any other site.</p> <p>Paragraph 9.15.7 of the PLP is clear that where a development proposal for a safeguarded wharf includes land uses unrelated to the handling of waterborne freight, the design of the development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf. The freight handling capacity of the wharf must not be reduced and the reactivation of the wharf for</p> <p>waterborne freight handling must be delivered and secured for the long-term in order for proposals to be deemed acceptable. Part B of draft Policy LP43, paragraph 18.99 which allows for mixed use development on safeguarded wharf sites should ensure that the wharf uses are retained and protected. Any site allocations where this is of relevance and proposed should explicitly state that the wharf use must be retained and protected, preferably under the "Use" heading.</p> <p>The Mayor welcomes Wandsworth's support for the Agent of Change principle in relation to safeguarded wharves and the borough is encouraged to implement this in accordance with PLP Policy D13.</p> <p>Wandsworth should note that on 19 February, the Secretary of State issued new Safeguarding Directions for wharves identified in the Implementation Report - Safeguarded Wharves Review 2018-2019. The safeguarding directions require that all planning applications affecting safeguarded wharves must be referred to the Mayor.</p>	<p>Support noted. The policy approach is considered to include satisfactory detail and criteria to ensure the retention and protection of the safeguarded wharf sites, and that the site allocations include appropriate reference to the development particulars for the sites.</p> <p>It is considered helpful to explicitly state, within the supporting text, that as per the Safeguarded Wharves Review 2018-2019, all planning applications affecting safeguarded wharves must be referred to the Mayor.</p>	Amend paragraph 18.95 to include reference to state that all planning applications affecting safeguarded wharves must be referred to the Mayor.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1311	Policy LP43	<p><b>See attachment on comment 1294 for full representation and context</b></p> <p><b>LP43 - Protected Wharves</b></p> <p>While we generally support the overarching approach to protect Strategic Wharves within London, we have concerns that Policy LP43 does not reflect the New London Plan Publication Version (2020) Approach to the consolidation of wharves.</p> <p>Policy SI15 of the New London Plan Publication Version (2020) states that the Mayor will:</p> <p>Keep the network of safeguarded wharves under regular review. Boroughs should protect existing locations and identify new locations for additional waterborne freight. There may be opportunities to consolidate wharves as part of strategic land use change, in particular, within Opportunity Areas; these will need to ensure that the existing and potential capacity and operability of the safeguarded wharves is retained and where possible expanded.</p> <p>In order to maintain consistency between the two plans we request that policy LP43 is update to reflect the above. This will ensure that land swaps involving safeguarded wharfs can continue across Wandsworth and wider London. Given that there are a number of safeguarded wharves in and around key intensification in the Borough, it is clear without an approach to relocating the wharves the future development in these keys areas could be impacted.</p>	It is agreed that reference could be made to the potential for consolidation as identified within London Plan Policy SI 15 to ensure consistency between that policy and LP 43.	Amend LP43, Part A, to include reference to the possibility for consolidation as part of a strategic land use change in an Opportunity Area, in reference to Part D of London Plan Policy SI 15.
Chris Girdham	Development Director Cory Riverside Energy	Helena Burt	Planner Rolfe Judd Planning	1366	Policy LP43	<p><b>See attachment on comment 1361 for full representation and context.</b></p> <p>Cory Comments</p> <p>While we generally support the overarching approach to protect Strategic Wharves within London, we have concerns that Policy LP43 does not reflect the New London Plan Approach to the consolidation of wharves.</p> <p>Policy SI15 of the New London Plan states that the Mayor will:</p> <p><i>Keep the network of safeguarded wharves under regular review. Boroughs should protect existing locations and identify new locations for additional waterborne freight. There may be opportunities to consolidate wharves as part of strategic land use change, in particular, within Opportunity Areas; these will need to ensure that the existing and potential capacity and operability of the safeguarded wharves is retained and where possible expanded.</i></p> <p>In order to maintain consistency between the two plans we request that Policy LP43 is updated to reflect the above. This will ensure that land swaps involving safeguarded wharfs can continue across Wandsworth and wider London. Given that there are a number of safeguarded wharves in and around key intensification areas in the Borough, it is clear a flexible approach will be required to maintain and support potential capacity increases in the river freight capacity of the Borough.</p>	It is agreed that reference could be made to the potential for consolidation as identified within London Plan Policy SI 15 to ensure consistency between that policy and LP 43.	Amend LP43, Part A, to include reference to the possibility for consolidation as part of a strategic land use change in an Opportunity Area, in reference to Part D of London Plan Policy SI 15.
Michael Atkins	Senior Planning Officer Port of London Authority			1473	Policy LP43	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP43: Protected Wharves.</p> <p>In principle support part A of the policy which states that the borough's five wharves will be safeguarded for the transshipment of freight, including waste and aggregates, and for freight-related activities and that 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 SI15. These operational safeguarded wharves have each provided significant investment into the</p>	<p>Support noted.</p> <p>Part B of the policy specifies that development proposals should retain or increase the operation of safeguarded wharves for waterborne freight transport. This should include reference to the use too.</p> <p>It is agreed that the intention to safeguard the wharves should be clear within the Area Strategies.</p> <p>It is considered that the wording of Part C provides sufficient guidance concerning development proposals on sites adjacent or nearby to the safeguarded wharves, and that extending this area to all sites within the relevant Area Strategies (Nine</p>	<p>Add reference to the use as well as operation of safeguarded wharf sites in LP 43, Part B.</p> <p>Amend paragraph 18.95 to include reference to the Secretary of State's Safeguarding Directions.</p> <p>Clarify within all of the safeguarded wharves that intention to protect the operational capacity of the wharves, including where mixed-use redevelopment is permitted.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>borough and provide a number of jobs for local residents. The future maximisation of use of these wharves is specifically supported by policy S115 of the emerging London Plan which in part f specifically states that development proposals which increase the use of safeguarded wharves for waterborne freight transport will be supported.</p> <p>As noted in the Local Plan area strategies which contain safeguarded wharves the PLA consider this intention must be made clear, particularly with regard to allocation NE9 at Kirtling Wharf which appears to introduce alternative uses within the Safeguarded Wharf boundary.</p> <p>Part B is also supported in principle which states that proposals for mixed use development on safeguarded wharf sites must be designed to retain or improve the long term operation of the safeguarded wharf, including the retention of adequate access arrangements and ensuring that the operational capacity of the facility is not reduced. This must also be in line with London Plan Policy S115 which states that it must be ensured that such development is designed so that there are no conflicts of use and that the freight handling capacity of the safeguarded wharf is not reduced.</p> <p>Welcome the reference in part C of the policy to the need for development located in close proximity to safeguarded wharves to be designed in line with the Agent of Change principle, however it is considered that this requirement must also be made clear as an important consideration for development located in those area strategies which include a safeguarded wharf.</p> <p>As part of the supporting text of the policy, reference must be made to the fact that the Ministerial Safeguarding Directions for these wharves have now been updated. The reference in paragraph 18.99 to the need for any potential mixed use redevelopment proposals to be discussed with the GLA and PLA, and any other relevant parties is welcomed.</p>	<p>Elms and Wandsworth) would result in unnecessary duplication. For clarity, however, the wording of the policy does replicate that of the London Plan, Policy SI 15.</p> <p>Reference to the updated Ministerial Safeguarding Directions is made in paragraph 18.95, however this could be clarified.</p>	

## Chapter 19 - Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Sectary to planning committee Battersea Society			825	General Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres Comments	<p><b>19: ENSURING THE VITALITY, VIBRANCY AND UNIQUENESS OF THE BOROUGH'S CENTRES</b></p> <p>The pandemic has had a catastrophic effect on many businesses in the borough's town centres: and there must now be huge uncertainty about the projections set out in the RNA completed in the first half of 2020. Supporting the recovery of town centres and businesses must now be a key strategic aim for the Council, working with other bodies including the Business Improvement Districts and the GLA's London Recovery Programme.</p> <p>There is little evidence in the Plan of innovative thinking: developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management. These and other things are essential if the Council is to work effectively with others in re-imagining what high streets might be.</p> <p><b>Protection and Planning Controls</b></p> <p>Changes in Government policy have added significantly to the uncertainties. The new Class E introduced in September 2020 covers most kinds of commercial use, from shops and restaurants, to offices, clinics and day nurseries. The Plan "embraces the flexibility that the new Use Class E provides". It also acknowledges that changes of use within the same use class (ie Class E) do not constitute development and therefore do not require planning permission. The Council's ability to exercise control over changes of use has therefore been significantly reduced. That loss of control will be made much worse if the Government implements its current proposals to extend PDRs to allow the conversion of any Class E premises to residential use.</p> <p>At the same time, however, the Plan offers promises of protection for some key characteristics of the borough's town centres, local centres and important local parades. Thus LP 45 states that the Council will guard within town centres against over-concentration of similar uses in specific areas; that it will seek to retain retail floorspace to maintain a strong retail core for the long term; that it will seek to preserve continuity of active frontages, with shopfronts; and that it will seek to restrict conversion to residential uses to rear and to the upper floors of premises used for commercial or community uses. How any of this protection is to be provided, however, is open to considerable doubt. The Article 4 Directions currently in place are unlikely to be of any use in future.</p> <p><b>Town Centres, Local Centres, Important Local Parades and Designated Frontages</b></p> <p>The RNA suggests that the Council should review its town centre and other boundaries, and its strategic approach to designated frontages, which have not been reviewed for many years. There is no indication in the Plan that the Council has done so, and we suggest that it should. We have noted some oddities in our response to the Area Strategy for Clapham Junction: the absence of any designation for the commercial properties on St. John's Hill west of Spencer Road, for those on Northcote Road between the junctions with Wakehurst Road and Honeywell Road, or for those on Falcon Road north of the underpass. The distinction between those properties and others which are designated, such as 3-5 Lavender Sweep, 1-45 Lavender Hill, the Important Local Parade consisting of three shops at 59-63 Broomwood road, or 47-67 East Hill is far from clear.</p> <p>We believe that there are many other unexamined peculiarities relating to town and local centre boundaries, and to the distinctions between core, secondary</p>	<p>The draft Local Plan recognises that the Coronavirus pandemic has already - and will continue to have - a significant impact on the borough's centres and parades, and will likely result in an increase in vacancies (particularly over the shorter-term). The Retail Needs Assessment is predominantly based on spending projections, and the Council consider that the broad conclusions about likely spend still provide a good indication of potential demand over the course of the Local Plan period (the longer-term). It is recognised that there may be greater 'local spend', as a result of a trend towards working from home; however this may seek to counter some of the vacancy caused by the enforced closure of town centre uses during periods of lockdown. The Council will, in the review the Local Plan, commission more research at the appropriate time and once more reliable data is available, and the policies will be adjusted accordingly as part of future reviews of the Local Plan.</p> <p>The draft Local Plan does, contrary to these comments, introduce some quite significant changes to its approach to town centre management, in particular with respect to land use (the core issue for a Local Plan), permitting a much greater degree of flexibility over the use of retail units in core and secondary frontages. This accords with the Government's broader initiatives through the introduction of a more diverse 'Commercial, business and services uses' Use Class E, which has amalgamated various former distinct town centre uses, and was introduced directly as a response to COVID. The Council has liaised with business representatives through the Chamber of Commerce and via meetings with the BIDs. Broadly, the flexibility over land use has been welcomed by businesses, and is recognised as reflecting broader trends within centres that pre-dated the pandemic.</p> <p>That notwithstanding, the Plan continues to advocate for the protection of certain uses - such as offices and, where possible, retail units. It is important to note that despite Class E, certain applications will still require planning permission, and in such cases that Council consider that it is important to afford appropriate protection for the replacement of retail facilities, or to prevent against over-crowding of uses.</p> <p>It is agreed that the introduction of new Permitted Development Rights (PDR) enabling the change of use of properties in Class E to C3 (dwelling houses) does pose risks to the protection important uses in key locations (such as centre and clusters of economic uses), and the Council has taken forward an Article 4 Direction to limit the extent of the PDR.</p> <p>The Retail Needs Assessment recommended limited changes to the borough's town centre boundaries. In Clapham Junction, it was proposed that the "Station area to the north and the area to the west of the centre along St John's Hill not currently occupied by main town centre uses" should be excluded from the town centre boundary. The Council considered both recommendations as part of the Regulation 18 Local Plan and decided against progressing either. The former area is located within a site allocation ('Land on the corner of Grant Road and Falcon Road, CJ3') which includes commercial uses on the ground floor, and the Area Strategy for Clapham Junction also sets out the intention to increase the permeability of the path under the railways. The latter area (formed of the Peabody Estate), similarly, has been planned to provide town centre uses along the site's frontage to St Johns Hill to integrate the redevelopment of the site with the town centre. This is set out within SSA 64 of the Site Specific Allocation Document and confirmed through the subsequent planning permission. Its exclusion from the main town centre boundary is therefore not appropriate.</p> <p>The RNA further suggests the removal of the Asda, Boots and Lidl store from the Core Shopping Frontage and re-designation as Secondary Shopping Frontage. This is considered appropriate given the location of this site away from other core frontages, and the change should be taken forward within the Regulation 19 version. It is noted, however, that the Local Plan has been developed during a period of transition within the national planning policy landscape with respect to retail uses, most notably through the introduction of Class E. This Class combines previously distinct use classes into a broader 'commercial, business</p>	Re-designate the Boots, Falcon Lane (10 Falcon Lane), Lidl, Falcon Lane and Asda, Lavender Hill as Secondary Frontage, rather than Core Frontage.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						and other frontages across the borough. The current designations are not fit for purpose, and may lead to perverse decision-making.	<p>and service uses' class, which permits greater flexibility of use within centres and has made the application of the Council's previous threshold-based approach to retail frontages difficult to implement. The distinction between the different hierarchies of shopping frontage is nonetheless retained in the Local Plan as this is considered to be a useful reflection of the Council's vision for the borough's centres, however given the introduction of Class E negates policy control over use, a detailed review of these categories as part of the Regulation 18 Local Plan was not considered to be an efficient use of resources.</p> <p>The other significant change within the policy landscape is the introduction of new permitted development rights which, subject to certain criteria, would enable the conversion of Class E uses (including certain town centre uses) to residential. The Council intends to make an Article 4 Direction limiting the scope of the new PDR in certain strategic locations, including within town and local centres and Important Local Parades. Recent changes to the NPPF have clarified that the application of Article 4 Directions should be based on robust evidence and should be applied to the smallest geographical area possible (paragraph 53). As identified within the Retail Needs Assessment, in Clapham Junction the retail and food and beverage projections suggest "there is no capacity for new Class A1 to A5 floorspace for the foreseeable future up to 2035". Given this, and in the context of changes to the NPPF, it is therefore difficult to justify extension to the town centre boundary (and correspondingly, the areas to which the Article 4 Direction would apply).</p> <p>That notwithstanding, it is important to note that each of the areas identified within this representation (as suitable for further policy protection) is adjacent to existing designations, whether as a town centre or an Important Local Parade. These sites are therefore identified as 'edge of centre' and would be sequentially preferable locations for the development of certain commercial uses (if there are no suitable sites available within the centre itself) as part of the approach set out in LP 46 (Out of Centre Development). As per the NPPF, for retail uses, edge of centre is defined as sites located 300m from the primary shopping area (defined as centres or ILPs), and for all other main town centre uses, edge-of-centre is defined as within 300m of a town centre boundary. Finally, it is noted that as a result of the classification of existing retail uses as Class E, the change of use from extant retail premises to other non-retail Class E uses, including for sites which are 'edge-of-centre' with respect to Important Local Parades (such as those on St Johns Hill to the west of Spencer Road), would not require planning permission to do so.</p>	
Monica Tross	Sectary to planning committee Battersea Society			829	General Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres Comments	<p><b>Other policies</b></p> <p>Section 19 stresses that policies set out in other Sections of the Plan – such as LP17 on social infrastructure, LP18 on arts and entertainment, LP35 on visitor accommodation, and LP 36 on offices - are intended to provide support for local and town centres; and that the Plan must be read as a whole. But it is disappointing that there is little attempt in Section 19 to bring these policies together and present an overarching strategy. This is the more disappointing because some of the policies cited – for example, LP17 on social infrastructure and LP 18 on arts and entertainment, along with LP 19 on play spaces – say nothing about focuses for provision in town or local centres. Similarly, LP36 on office space states that offices in town centres will be protected, without saying how; and LP46, along with LP35 on visitor accommodation, actually supports the development of hotels in edge-of-centre locations and in the Focal Points of Activity along the River Thames, without subjecting them to the sequential test that applies to most other developments, thus risking the vitality of the town centres.</p>	<p>Paragraph 19.13 made reference to various policies found elsewhere within the Local Plan which, in turn, made reference specific uses within the broader definition of 'main town centre uses', as defined by the NPPF. Such reference was considered useful to help direct a reader of the Regulation 18 version to these more detailed requirements, notwithstanding that an overarching approach is set out within LP 45. The approach is consistent between these chapters, and these policy requirements do not need repetition within the Chapter 19. It is agreed, however, that inclusion of the NPPF definition nor the cross-referencing is necessary in the Regulation 19 version, which (for the purposes of any prospective planning application) should be read as a whole. Paragraph 19.13 should therefore be removed.</p> <p>The adopted Local Plan identifies Focal Points of Activity as suitable locations for new hotel development, encouraging them to become key destinations which are designed to make full use of the amenities offered by the riverside. This approach is considered to remain applicable, however it is agreed that such locations should not be prioritised over town centre (and CAZ locations, in accordance with the London Plan), and that while it is appropriate to identify Focal Points as preferential to other non-centre locations, they should still be subjected to a sequential test (which also identifies preference for edge of centre sites).</p>	<p>Remove paragraph 19.13.</p> <p>Amend LP 35 (Visitor Accommodation) and LP 46 (Out of Centre Development) to remove the exception negating the need to pass a sequential test for visitor accommodation developments in these locations. It should still be identified as a preferential location.</p>
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1345	General Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres Comments	<p>19 Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres We would like to make the following suggestions: - The retail needs assessment be updated to include COVID-19 effects. - A plan be developed to reduce retail/frontage space in line with reduced demand where they manifest.</p>	<p>The impact of the Coronavirus pandemic, and the counter-measures introduced to mitigate this, has had a significant impact on the borough's centres and local parades. The longer term impact of this is not yet clear, and is unlikely to be so within the timescales for the production of this Local Plan. The borough has introduced greater flexibility in town centre uses which are intended to support the recovery of its centres, whilst also reacting to longer-term market and legislative change (e.g. the introduction of Class E). The borough will continue to monitor vacancy rates and the distribution of uses within its centres and parades, which will help to provide an understanding of the impact of the pandemic, and will</p>	<p>No changes to the Local Plan are considered necessary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							update its Retail Needs Assessment in support of future planning policies if necessary.	
Mr Robert Arguile	Chair The Putney Society			383	19.3	<p>Wandsworth's Retail Needs Assessment (RNA) 2020 .. indicates that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace provision .. up to 2035. Roehampton is the exception to this. <u>A full offer supermarket is needed here.</u> This has been requested by residents in every consultation on the regeneration since 2006. Access to the alternatives adds to the transport overcrowding here.</p> <p>19.5 emphasises the importance in providing greater flexibility in the planning of town centres.</p>	Paragraph 19.3 summarises the findings of the Retail Needs Assessment, which recognises that there is a major planned commitment for a replacement Sainsbury's Local store within the Roehampton Zone, but otherwise identifies a need of only 68 sqm of A1 convenience floorspace by 2035 based on population and expenditure growth models. That notwithstanding, Site Allocation RO1 Alton West Intervention Areas identifies scope for improved shopping facilities, including retail, and the provision of new supermarket facilities within the local centre would be supported by the Local Plan retail policies set out within LP 44 (Wandsworth's Centres and Parades) and LP 45 (Development in Centres).	No changes to the Local Plan are considered necessary.
Mr Chris Brodie				467	19.3	<p>At the Retail Needs Assessment makes clear, it was developed at the outset of the covid pandemic and makes the assumption that its impact will be short term. It is to be hoped that this is the case. More likely, there will be a more lasting impact, albeit that there could be a greater reliance on local shops and services. Perhaps the biggest challenge therefore is the direction of Government policy to make it easier to convert premises to residential use, when opportunities need to be available for a local businesses and services .Data suggest that the population of London has fallen due to a combination of covid and Brexit. Is the pressing need for housing as acute as it was a year ago I'm not sure that there's been enough time to reflect on the pandemic and the different patterns of activity that have arisen. Certainly during the first lockdown, people weren't travelling very far and local shops were a great boon to many. It's been interesting to see how shops and other businesses in Webb's Road have continued to trade compared with the number of empty units in Northcote Road.</p>	<p>The draft Local Plan recognises that the Coronavirus pandemic has already - and will continue to have - a significant impact on the borough's centres and parades. The Council takes the position that the longer term implications are not yet fully understood, and will continue to monitor vacancy rates and the mix of different uses (irrespective of the Use Class), which will inform future plan-making.</p> <p>That notwithstanding, the new Local Plan encourages greater flexibility of use within its centres, which accords with the Government's broader initiatives through the introduction of a more diverse 'Commercial, business and services uses' Use Class E , which has amalgamated various former distinct town centre uses. The Council intends to pursue an Article 4 Direction to limit the extent of permitted development rights enabling the change of use from E Class to residential dwellings (Class C3).</p> <p>The Local Plan also seeks to protect local shopping facilities that are outside of the borough's centres or parades, however it recognises that the flexibilities afforded by the introduction of the new Use Class E do, in turn, place limitations on the Council's ability to do so (e.g. to situations in which planning permission is required).</p> <p>Reflecting commentary from Regulation 18 respondents on the use of Webb's Road during the pandemic, and informed by a site visit, the Council intends to designate it as an Important Local Parade.</p>	<p>Webb's Road is to be designated as an Important Local Parade, inclusive of the following premises:</p> <p>1-2 Ashness Road 30-56 Webb's Road (evens) 65-71 Webb's Road (odds)</p> <p>Amend Policy LP 44 (Wandsworth's Centres and Parades) to reflect this, and all associated mapping.</p>
Dr David Curran	Lavender Hill for Me			1181	19.23	19.23 –We support the principle of retaining active frontages, but propose that the Local Plan should also note for the avoidance of doubt that this approach is welcomed with regard to 'other' frontages within town centres and Local Centres. The distribution of 'other' frontages is currently somewhat haphazard and does not always reflect reality on the ground –however the underlying principles of this approach are fully compatible, and these active 'office' uses could be quite beneficial to some of our retail parades, especially those in well connected local centres.	Agreed. The intention of the supporting text is to clarify that offices will only be appropriate in Core and Secondary Frontages where they present an active frontage (such as the types of provision identified). A broader category of office provision will continue to be permitted in Other Frontages (in keeping with the adopted policy approach). The supporting text should be amended to clarify this.	Amend paragraph 19.23 to clarify that offices with active frontages will be appropriate in all town centre locations, however only this type of provision will be appropriate in Core and Secondary Frontages.
Dr David Curran	Lavender Hill for Me			1182	19.26	19.26 –we strongly support the requirement that parades should maintain a parade-like appearance. We propose going slightly further by requiring that parades should maintain an activity to the street –which can be office, creative space, or indeed any Class E use. In cases where 'other' frontages are converted, we suggest that wherever practicable suitable Class E uses should be maintained on the street side of any units, with other non-Class E uses at the rear.	Part B of Policy LP 45 identifies that the designated frontages - including Core, Secondary and Other - accommodate town centre uses which are particularly important to the vibrancy of the centre. The Council's intention is that these frontages should retain such town centre uses (including those listed), with Part A stating that town centre uses are appropriate in centres and parades if they meet certain criteria. It is agreed that the policy as drafted does not clearly express, however, that non-town centre uses will not be allowed in the designated frontages and Important Local Parades, and the policy wording should therefore be amended to correct this. This reflects a continuation of the adopted Local Plan approach to Other Frontages and ILPs. In both Important Local Parades and Other Frontages, it is also appropriate to clarify that the use should present an active frontage to the street.	<p>Amend Policy LP 45, Parts B and C so that these are amalgamated (to reduce repetition) and to clearly state that only town centre uses will be acceptable and that proposals should maintain and promote the continuity of active frontages and / or provide a direct service to a visiting member of the public in all designated frontages and parades.</p> <p>Remove Part B.1.c, which becomes superfluous (and slightly contradictory) with the rearrangement of this policy.</p>
Mr Robert Arguile	Chair The Putney Society			384	Map 19.1	<p>We suggest the town centre boundary may need to be reviewed. The leg sticking out towards the Embankment contains no shops after the first 50m. Lack of footfall suggests that on the Upper Richmond Road the Town centre dies out after the Putney mead medical centre.</p> <p>The map also needs detailed review. Some busy shops (e.g. Co-op and Sainsbury's east of East Putney Station) don't appear on this map at all, whilst some coloured blocks (e.g. SW of Putney Cross) have no shops.</p> <p>Where does ASDA in Roehampton Vale fit in all of this?</p>	Map 19.1 shows the designated town and local centre boundaries within Wandsworth. It is recognised that such designations do not always reflect the reality of the use, and that certain areas of the centres will be occupied by other (policy-compliant) uses, such as pubs or hotels, rather than retail. The purpose of the designations is to direct such commercial activity to the appropriate locations within the centres on the basis of a hierarchical approach (Core, Secondary, and Other Frontages), helping to sustain a concentration of activity. The NPPF sets out that appropriate town centres uses should preferentially be located within the centre boundary, and if sufficient space is not available to accommodate that use then it should be directed to available out-of-centre locations (defined as being within 300m of the primary shopping area – the borough's designated frontages	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
							<p>and Important Local Parades – for retail uses, or within 300m of the town centre boundary for all other main town centre uses). Certain edge-of-centre locations, such as the Co-op and the Sainsbury's to the east of East Putney station, would therefore fall within these categories.</p> <p>There are also a number of isolated shops, such as the ASDA located within Roehampton Vale, which are not within 400m (considered to be easy walking distance) of a designated centre or an Important Local Parade. The Local Plan seeks to protect such provision of local goods and services, as set out in Policy LP 47 (Local Shops and Services).</p> <p>Furthermore, town centre uses have been subject to considerable change over the past year, both in response to the pandemic and through changes to the policy landscape. The latter includes the introduction of Class E (which combines previously distinct use classes into a broader 'commercial, business and service uses' class), as well as more recently the Government's introduction of new permitted development rights which would permit, subject to certain conditions, the change of use of E Class uses to become residential dwelling houses (C3). Given such change, the Council has been reluctant to undertake substantial amendments to the borough's centres, and has focused efforts instead on putting forward Article 4 designations in identified strategic locations which would prevent the application of permitted development rights in those locations (with applications instead subject to the policies as set out within the Local Plan).</p>	
Susie Morrow	Chair Wandsworth Living Streets			671	Map 19.1	Map 19.1 – Local Shopping Area needs to include Wandsworth Town/Old York Road	<p>Map 19.1 shows the town and local centre boundaries within Wandsworth, which have not previously included Old York Road. That notwithstanding, the Council recognises the important role that Old York Road plays for many residents, in particular over the past year, as well as for users of Wandsworth Town Station. The location of Old York Road remains distinct from the relatively concentrated Wandsworth Town Centre boundary, which is focused on Wandsworth High Street and the Southside Centre, and therefore the Council consider that Old York Road should be designated as an Important Local Parade.</p> <p>Relatedly, Map 19.1 should include Important Local Parades, recognising the important function and policy designation they hold, and for purposes of clarity, that map should be renamed 'Wandsworth's Centres and Important Local Parades'.</p>	<p>Old York Road is to be designated as an Important Local Parade, inclusive of the following premises:</p> <p>328-372 Old York Road (evens) 499-551 Old York Road (odds)</p> <p>Amend Policy LP 44 (Wandsworth's Centres and Parades) to reflect this, and all associated mapping.</p>
Mr Robert Arguile	Chair The Putney Society			385	Policy LP44	15 minute neighbourhoods encouraging walking to the shops makes Local Parades such as 349-393 Upper Richmond Road more important, but only where they are big enough to provide a balanced offer. We support the inclusion of those listed in Para A.4.	Support noted.	No changes required.
Mr Chris Brodie				471	Policy LP44	I note that the local plan has an image (Map 19.2, p347) that shows areas that are more than 400m from a Town or Local Centre. It includes a swathe of properties to the west of Clapham Common for whose occupiers, Webb's Road is convenient. With its range of services -dentist, physio, chiropractor, vets, cafes, greengrocers etc -Webb's Road functions in a different way from traditional retail parades, but demonstrates that the combination of an appropriate business plan, hard work, footfall, purchasing power and sustainable rents/rates can be successful and of huge benefit to the local area. Webb's Road isn't identified as an Important Local Parade in LP44 on p337, which doesn't reflect how useful the shop units have been over the past 12 months and I'm sure that there are plenty of other examples in the borough. Further thought needs to be given to understand how local shops can survive, indeed thrive, and in some instances be restored, to fit in with a strategy that promotes the 15 minute neighbourhood.	<p>Comment noted.</p> <p>It is recognised that the events of the past year have impacted shopping patterns within the borough. In response the identification by local residents of their use of Webb's Road, following advice from the Leader and the Local Plan Councillor Steering Group, and informed by a site visit, it is agreed that a number of premises on Webb's Road would benefit from designation as an Important Local Parade.</p>	<p>Webb's Road is to be designated as an Important Local Parade, inclusive of the following premises:</p> <p>1-2 Ashness Road 30-56 Webb's Road (evens) 65-71 Webb's Road (odds)</p> <p>Amend Policy LP 44 (Wandsworth's Centres and Parades) to reflect this, and all associated mapping.</p>
Dr David Curran	Lavender Hill for Me			1177	Policy LP44	<p>LP44 Wandsworth's Centres and Parades(Local Plan page 337 &amp; Policies map)</p> <ul style="list-style-type: none"> <li>We recognise the changes to economic use classes, and in particular the effect of Use Class E. In many ways this is a sensible development, as we had already seen a good deal of use class changes as the Lavender Hill / Queenstown Road area loses generalist retailers and instead accommodates a larger range of food and drink establishments, specialist retailers, and a rapidly increasing number of small offices and studios serving architectural, property, financial services and medical sectors. These new uses do continue to contribute to the overall health of the local centre and also</li> </ul>	Policy LP 45 seeks to incorporate the increased flexibility offered by Use Class E (Commercial, business and services uses). In addition, a number of other town centres uses, including offices, are promoted within the borough's centres and parades, where these are of a scale appropriate to the location. In the borough's protected shopping frontages and parades, the Local Plan set out that changes of use to residential uses will be resisted on the frontage facing the identified street. It is recognised that the introduction by the Government of new Permitted Development Rights (PDR) enabling the change of use from E Class to C3 will undermine this strategy (subject to certain limited prior approval criteria). The Council are considering proposals to take forward an Article 4 Direction to limit the extent of this PDR. It is noted, however, that the Government have consulted on proposed amendments in the NPPF for the use of Article 4 Directions, which	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>maintain an active streetscape (which is important for remaining retailers) and they also have the benefit of providing generally affordable workspace for smaller</p> <p>We propose that generally speaking, changes of ground floor retail to residential should be avoided along major roads. These units are better suited to other economic uses, and these other economic uses are better suited to these typically street-facing 'mid parade' locations, as they avoid creating gap-toothed parades, and it is in practice extremely difficult to deliver retail-to-residential conversions without creating unsightly ground floor frontages that damage the overall health of the town centres.</p>	would - if taken forward - seek to place greater restrictions on their implementation.	
Dr David Curran	Lavender Hill for Me			1178	Policy LP44	<p>LP44: Lavender Hill / Queenstown Road Local centre:(Local Plan page 337 &amp; Policies map)</p> <ul style="list-style-type: none"> <li>As noted –Class E changes the policy landscape quite significantly, but is broadly a potentially positive element of flexibility for our local centres, and reflects what was already a trend towards flexibility (including the integration of creative and workspace uses within retail parades, which has been successfully pioneered in several locations along Lavender Hill).</li> <li>We propose that –with a view to the slightly evolved function of frontage designations as a guide to future uses and as a means of discouraging ill-considered residential conversions from damaging the viability of otherwise promising clusters of Class E uses -the precise definition and extent of the Lavender Hill / Queenstown Road local centre needs updating, and indeed suspect that it may never have been fully accurate.</li> <li>In particular we believe 83-123Lavender Hill(odd) should be designated as secondary frontage, which would in effect slightly extend the scale of this local centre, and ensure it better reflects the current nature of this centre. This stretch (which is entirely on the south side of Lavender Hill, with a widened pavement) consists of a wide range of local services and convenience retail, including veterinary practices, pharmacy, cafe, a number of restaurants, two hairdresser, and a more traditional newsagent/corner shop. This in practice forms part of the centre, and links it to the significant economic centre of the adjacent Battersea Business Centre which generates significant traffic to and from, and trade within, the local centre. It has been strengthened by a slight 'westward shift' of the overall centre of gravity of this local centre in recent years, aided by major upgrade&amp; reconfiguration of smaller units at 47-57 Lavender Hill to support the arrival of a branch of the Cooperative supermarket and smaller chain multiples such as Pizza Hut, as well as on the opposite side of the road where 44-54 Lavender Hill have been extensively redeveloped to form larger and more modern interconnected retail units at ground level (currently a relatively large unit is occupied by a DIY and decoration retailer).</li> <li>It's worth also noting that there has been some development at the eastern end (in neighbouring Lambeth) to accommodate a branch of Tesco and a new Premier Inn hotel, all of which –coupled with continued residential densification –has led this secondary centre to grow somewhat since the previous plan was developed.</li> <li>As an alternative, these could be designated as an 'Important Local Parade' as they clearly also meet the definition of these (maybe, indeed, being rather more developed than that definition suggests), however in our view the former approach of extending the local centre seems to better reflect reality, because these units do form part of the local centre, and are closely integrated with the activity in the Battersea Business Centre they back on to.</li> <li>We appreciate that this may give a more elongated local centre (that may not look as tidy on maps)–however the reality on the ground is that this is the nature of this centre, and we believe it makes sense for planning policies to reflect this, and also to be able to give consideration to supporting the ongoing viability of this centre as a whole; and we do note that the overall illustration maps (for example</li> </ul>	<p>Support for the greater flexibility provided by Class E noted, which has been incorporated within the Local Plan. It is noted that the Council intends to pursue an Article 4 Direction to limit the extent of permitted development rights enabling the change of use from E Class to residential dwellings (Class C3), which would be applied to this local centre (as well as the nearby Battersea Business Centre).</p> <p>Recent changes to the NPPF, however, have clarified that the application of Article 4 Directions should be based on robust evidence and should be applied to the smallest geographical area possible (paragraph 53). As identified within the Retail Needs Assessment, in the Clapham Junction zone the retail and food and beverage projections suggest "there is no capacity for new Class A1 to A5 floorspace for the foreseeable future up to 2035". Given this, and in the context of changes to the NPPF, while it is recognised that the extent of commercial properties within Lavender Hill / Queenstown Road extends beyond the boundaries of the local centre as drawn within the Local Plan, it is difficult to justify the extension of policy protection / the local centre boundary (and correspondingly, the areas to which the Article 4 Direction would apply).</p> <p>That notwithstanding, it is noted that the areas identified within this representation (as suitable for further policy protection) are identified as 'edge of centre' and would therefore be sequentially preferable locations for the development of certain commercial uses as part of the approach set out in LP 46 (Out of Centre Development). As per the NPPF, for main town centre uses, edge-of-centre is defined as within 300m of a town or local centre boundary. Furthermore, as a result of the classification of existing retail uses as Class E, the change of use from extant premises to other Class E uses in 'out-of-centre' locations (including those identified) would not require planning permission to do so.</p> <p>With respect to 15-45 Lavender Hill, it is considered appropriate that these units should be redesignated as Secondary Frontage, reflecting the recent investment identified within the representation.</p>	Redesignate 15-45 Lavender Hill as Secondary Frontage, rather than Other Frontage.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>on page 32 of the draft Local Plan) do reflect this linked and elongated reality to some extent.</p> <p>We propose that 15-45 Lavender Hill should be reclassified from 'other' frontages to 'secondary' frontages. These are relatively large units (often with street-facing terraces) that act as an anchor to the local centre, and which have in most cases seen quite significant recent investment (for example 45 Lavender Hill has had a major upgrade to create a medical centre, and units further down have been upgraded, 312 Lavender Hill has been enlarged internally and converted to bakery, while 33, 39 and 43 have been partially redeveloped to serve as larger restaurants and bars, playing a much larger role in the focus of this centre than at the time of the previous Local Plan when these were rather obsolete units selling bric-a-brac and in some cases vacant).</p>		
Dr David Curran	Lavender Hill for Me			1179	Policy LP44	<p>LP44: Clapham Junction town centre: (Local Plan page 337 &amp; Policies map)</p> <ul style="list-style-type: none"> <li>We suggest 155-157 Falcon Road (a unit on the ground floor of the Travelodge Hotel, but separately tenanted, and currently occupied by a restaurant) be designated as 'other frontage'. We suspect the current non designation is because it has not been updated since it was an office building (with no frontage as such).</li> <li>We propose 299-313 Lavender Hill should be reclassified as 'core frontage': It is anchored by a unit that has been reconfigured and extended (with merger of neighbouring units) and which is now occupied by Whole Foods Market, a significant national retailer, and the other units are increasingly central to the shopping area (for example including Nando's, another national retailer). Falling between the St John's Road and the large Asda site, this stretch with its large and modern units is arguably now prime pitch territory.</li> </ul> <p>We propose 230-240 Lavender Hill should be reclassified as 'secondary frontage'. This is the Pizza Express &amp; HSBC units, with offices above; as two large modern units occupied by national multiples, and immediately adjacent to the major anchor of Asda, this short stretch seems to meet the definition of secondary rather more closely than 'other' frontage. We suspect the original 'other' designation may simply be an error in this case.</p>	<p>It is agreed that 155-157 Falcon Road should be appropriately designated as Other Frontages, which reflects the use as a restaurant. The Area Strategy for Clapham Junction sets out ambitions to improve permeability and access under the Falcon Road Bridge, and the presence of active frontages (required by the Other Frontage designation) would help to support this.</p> <p>It is agreed that 299-313 Lavender Hill should be reclassified as Core Frontage, which reflects the investment in this frontage as identified in the representation, including the location of an anchor tenant in Whole Foods Market.</p> <p>It is agreed that 230-240 Lavender Hill should be reclassified as Secondary Frontage, with the use of these premises reflecting the definition well. This would also bring consistency with the redesignation of the Asda, Boots and Lidl Store frontage from Core to Secondary, as identified within the Retail Needs Assessment.</p>	<p>Designate 155-157 Falcon Road as an Other Frontage.</p> <p>Redesignate 299-313 Lavender Hill as Core Frontage, rather than Secondary Frontage.</p> <p>Redesignate 230-240 Lavender Hill as Secondary Frontage, rather than Other Frontage.</p>
Axis Construction		Joseph Hickling	Planner Boyer Planning Ltd	1221	Policy LP44	<p><b>See comment 1217 for attachment of full representation</b></p> <p><u>Draft Policy LP44 - Wandsworth's Centres and Parades</u></p> <p>2.28 Part A4b of this draft policy identifies 141-185 Battersea High Street as an 'Important Local Parade'.</p> <p>2.29 George Potter House is located opposite these identified units. This means there is a positive opportunity to incorporate new ground floor retail floorspace, as part of the proposed redevelopment of George Potter House. This would enhance the economic viability and vibrancy of the high street.</p> <p>2.30 It is therefore suggested that the supporting text as paragraph 19.11, should allow for an element of flexibility at Important Local Parades. This would be particularly beneficial for sites located within or adjoining the parades, which could offer the potential to provide more services to local communities.</p> <p>2.31 It is therefore recommended that the following text is added to the end of paragraph 19.11: "Extensions and enhancements to Important Local Parades are encouraged where suitable".</p>	<p>The Local Plan recognises the key role that Important Local Parades (ILPs) play in contributing to sustainable development, providing access to day-to-day necessities (including food, newsagents, pharmacies and post offices). Paragraph 19.24 states that Policy LP 45 seeks to "protect and enhance" ILPs, noting that they are considered as 'primary shopping areas' for the purpose of the NPPF. This means that for retail developments within 300m of an ILP - such as that proposed as part of the redevelopment of George Potter House - would be considered as 'edge-of-centre' for the purposes of LP 46 (Out of Centre Development), and would be identified as sequentially preferable sites should none be available within the parade itself. This point is important, and should be clarified within the supporting text of LP 46. It is appropriate to add wording to paragraph 19.24 stating that extensions, where policy compliant, are supported.</p>	<p>Amend paragraph 19.24 to identify that extensions and enhancements to ILPs are encouraged, where suitable.</p>
Mr Robert Arguile	Chair The Putney Society			386	Policy LP45	<p>Generally supported</p> <p>LP45.C Fits better in Policy LP44.</p>	<p>Support noted. Agreed that reference to ILPs (and local centres) should be included in LP44.B, which already references appropriate development in the town centres. LP 45 has been reworked to simply the section relating to frontages, however as ILPs are, in effect, a form of frontage without a centre boundary, it is considered appropriate to retain reference to them in LP 45 alongside the policies on core, secondary and other frontages.</p>	<p>Amend LP44.B so that this reflects each of the categories within the hierarchy referenced above.</p> <p>Amend the supporting text between paragraphs 19.11 and 19.24 to reflect the</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
								above change, with more 'introductory' text on the nature of ILPs included in the earlier paragraph.
Dr David Curran	Lavender Hill for Me			1180	Policy LP45	<p>LP45 Development in Centre(Local Plan page 339 &amp; Policies map)</p> <ul style="list-style-type: none"> <li>We are concerned at the trend for conversion of retail space to residential, which tends to be a habit of somewhat dubious short-termist developers and can result in either low-quality flats crammed in shop spaces that give a poor overall impression and damage the integrity of commercial parades, or flats in back areas coupled with extremely small residual retail units, which threaten the overall viability of some local centres and shopping parades. The priority should be in ensuring that parades remain viable, and that they can accommodate creative and employment uses –and hence that gap-tooth development of poor quality residential conversions on streets should be avoided.</li> <li>While it is in principle quite reasonable for back areas to be converted to residential, Class E uses should be retained at the street side. We therefore generally support the proposals for projects that involve the sub-division or partial loss of a unit to accommodate an acceptable town centre use must ensure that the proposed unit is fit for purpose and is viable in the long term, including providing adequate width and depth, layout, street frontage and servicing.</li> </ul> <p>We propose that one element of policy B. I. b. (Proposals should maintain and promote the continuity of active frontages) should apply to all frontages, rather than just to core and secondary frontages; in other words an additional criterion be applied to B. 2. A. that "(Proposals should maintain and promote the continuity of active frontages)". The current designation of 'secondary' versus 'other' frontages is somewhat haphazard in some of the Borough's Local Centres (most notable the Queenstown Road / Lavender Hill local centre that is our primary interest), and we feel that this policy should be the default in order to maintain parade continuity, rather than supporting gap tooth development in the middle of parades. The new Class E has provided substantial flexibility already, and we consider that the provision of Class E use facing parades should be the default approach wherever practicable –given that it has proved to date to be quite achievable even in cases where rear parts of units see conversion to wider uses.</p>	<p>The borough's designated frontages (and Important Local Parades), and the policies associated with them, are intended to preserve active uses fronting the street, with which residents and visitors can engage and which help to sustain the vitality and viability of the centres and parades. It is agreed that the policy could more clearly state this intent, and that it is reasonable to extent requirements for the maintenance and promotion of the active element to all frontages. It should further be clarified that only town centre uses (a slightly larger category than simply E Class, which excludes uses such as pubs or community facilities) will be appropriate in these frontages.</p> <p>Support for the policies requiring the long-term viability of the frontages or commercial uses is noted.</p>	Amend Policy LP45, Parts B and C so that these are amalgamated (to reduce repetition) and to clearly state that only town centre uses will be acceptable and that proposals should maintain and promote the continuity of active frontages in all designated frontages and parades.
Ms Janet Kidner	Development Director Landsec	Guy Bransby	Jones Lang LaSalle Ltd	1216	Policy LP45	<p><b>Policy LP45 Development in Centre</b></p> <p><i>Policy LP45 defines the Borough's designated frontages which accommodate the town centre uses. These are also identified on the Policies Map.</i></p> <p><i>We are supportive of Southside's allocation as a Core frontage, whereby proposals for new retail uses will be supported. The recognition that Classes E, F1 &amp; F2 uses are also considered suitable uses in Core and Secondary Frontages is also supported. We believe in the long-term success of retail, however, where the Policy states that conditions may be applied to planning permissions to retain retail floorspace, it should be noted that this should be subject to demand and commercial viability.</i></p> <p>Policy LP45 states:</p> <p>"D. New retail development as part of large mixed-use scheme must provide a range of sizes of shop units, including those intended to accommodate small and independent retailers. Conditions may be applied to prevent the future amalgamation of the units, without requiring planning permission, in order to protect this provision (See also Part G).</p> <ol style="list-style-type: none"> <li>Residential uses will be permitted in designated centres, as follows: <ol style="list-style-type: none"> <li>High density mixed use development, including</li> </ol> </li> </ol>	<p>Support noted. It is noted that the policy has been amended to amalgamate parts of the policy, for simplicity. The reference to distinct use classes (E, F1 &amp; F2) has been removed and replaced with reference instead to 'an appropriate town centre uses'.</p> <p>The supporting text provides further justification for why the use of conditions to control use may be suitable, however it is considered acceptable that this should also refer to commercial viability.</p>	Amend the supporting text (paragraph 19.20) to stipulate that the use of conditions should be subject to commercial viability.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>residential, will be supported in appropriate locations, as identified within the relevant Area Strategy and associated Site Allocations, subject to compliance with other policies in this Plan. b. The conversion for residential purposes of the upper floors or the rear of ground floor occupied by a commercial or community use will be permitted, where this can be designed to provide a high level of residential amenity without compromising the existing or potential operation of uses on the ground floor (See Part F)</p> <p>2. All new development, including change of use and proposals that involve the sub-division or partial loss of a unit to accommodate an acceptable town centre use must ensure that the proposed unit is fit for purpose and is viable in the long term, including providing adequate width and depth, layout, street frontage and servicing. The applicant must demonstrate this criterion has been met as part of the application with each proposal considered on its merits.</p> <p><i>"We are broadly supportive of the above policy wording. In particular, we are supportive of part E which stipulates that high-density mixed-use development, including residential, will be supported in appropriate locations as identified within the associated Site Allocations. We are also supportive and agree that development in the Town Centre must ensure that the unit is fit for purpose and viable in the long-term."</i></p>		
Kin Development		Ben Ford	Director Quod	1052	Policy LP46	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Policy LP46 (Out of Centre Development) - OBJECT</b></p> <p>NPPF paragraph 89 states that 'when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment ...'. It is not therefore compliant with national policy to require an impact assessment where the land uses proposed are in accordance with the site allocation.</p> <p>There are limited circumstances in which the provision of certain new town centres uses in out-of centre locations are identified within the Local Plan in order to contribute to wider strategic initiatives. In these instances, the Sequential and <b>Impact Test</b> set out in Part A.1 <b>and 2</b>. will not apply:</p>	It is agreed that reference should be made to the impact assessment being exempt in circumstances where the relevant town centre uses are identified within a site allocation (and therefore form part of an 'up-to-date plan' in line with the NPPF paragraph 89).	Amend LP 46.B.1 to refer to impact assessments.
Robert East	Senior Planning Policy Officer LB Lambeth			1593	Policy LP46	<p>LP46 Out of Centre Development</p> <p>B. There are limited circumstances in which the provision of certain new town centres uses in out-of-centre locations are identified within the Local Plan in order to contribute to wider strategic initiatives. In these instances, the Sequential Test set out in Part A.1. will not apply:</p> <p>1. New town centre uses will be acceptable on sites identified for those uses within Site Allocations, and as set out in the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA) Framework, where the scheme is compliant with the requirements included within those documents.</p> <p>2. In Economic Use Protection and Intensification Areas (EUPAs and EUIAs) the provision of intensified office floorspace, as part of the mixed use redevelopment of the site, will be permitted where this complies with Policy LP 38 (Mixed Use Redevelopment). All other main town uses will be subject to a sequential test as set out in Part A.</p> <p>3. In the Focal Points of Activity and edge of centre locations, proposals for new visitor accommodation uses will be acceptable, and will not be subject to the sequential test, where they comply with the requirements of Policy LP 35</p>	See response to comment # 1591 (Nine Elms Area Strategy). The inclusion of these uses within site allocations is considered to be in conformity with the VNEB OAPF, and that changes in response to comment # 1591 will have suitability mitigated concerns.	See response to comment # 1591 (Nine Elms Area Strategy)

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>(Visitor Accommodation). Further information on Focal Points of Activity is included in the Area Strategy for Wandsworth's Riverside and in Policy LP 56 (Riverside Uses).</p> <p>With regards to exception 1, retail development is being supported in a number of site allocations in Nine Elms which lie in reasonably close proximity to Vauxhall (NE1, NE2, NE3, NE5, NE9, NE11, NE12). With this in mind, please see Lambeth's comments relating to part PM3 D and E.</p> <p>Regarding exception 3, please see our comments relating to LP35.</p>		
Legal and General Property Partners	Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited	Neil Wells	Quod	1553	Policy LP46	<p><b>See attachment in representation 1534 for context</b></p> <p>Policy LP46 (Out of Centre Development) - OBJECT</p> <p>NPPF paragraph 89 states that 'when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment ...'. It is not therefore compliant with national policy to require an impact assessment where the land uses proposed are in accordance with the site allocation.</p> <p>B. There are limited circumstances in which the provision of certain new town centres uses in out-of-centre locations are identified within the Local Plan in order to contribute to wider strategic initiatives. In these instances, the Sequential and <u>Impact Test</u> set out in Part A.1 <u>and 2</u>. will not apply:</p>	It is agreed that reference should be made to the impact assessment being exempt in circumstances where the relevant town centre uses are identified within a site allocation (and therefore form part of an 'up-to-date plan' in line with the NPPF paragraph 89).	Amend LP 46.B.1 to refer to impact assessments.
DTZ Investors		Neil Wells	Quod	1513	Policy LP46	<p>Chapter 18 Building A Strong Economy Policy</p> <p>LP46 (Out of Centre Development) - OBJECT</p> <p>NPPF paragraph 89 states that 'when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment ...'. It is not therefore compliant with national policy to require an impact assessment where the land uses proposed are in accordance with the site allocation.</p> <p>B. There are limited circumstances in which the provision of certain new town centres uses in out-of-centre locations are identified within the Local Plan in order to contribute to wider strategic initiatives. In these instances, the Sequential <u>and Impact</u> Test set out in Part A.1 <u>and 2</u>. will not apply:</p> <p>On behalf of DTZi, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or these is a change in policy at a local, regional or national level.</p>	It is agreed that reference should be made to the impact assessment being exempt in circumstances where the relevant town centre uses are identified within a site allocation (and therefore form part of an 'up-to-date plan' in line with the NPPF paragraph 89).	Amend LP 46.B.1 to refer to impact assessments.
Lockguard Ltd		Mr David Shields	Associate DP9	1648	Policy LP47	<p><b>Draft Policy LP47 - Local Shops and Services</b></p> <p>Draft Policy LP47 addresses the Council's position on local shops and services within the borough. The Draft Policy states that there are limited areas in the borough which are 'not within reasonable walking distance (400 metres) of an existing centre or an Important Local Parade'. Within such areas, there may be a deficiency of essential goods and services to meet local needs. As defined in Map 19.2 in the Draft Local Plan, the Site is partially located within an area 'not within reasonable walking distance (400 metres) of an existing centre or an Important Local Parade'.</p> <p>Draft Policy LP47 states that, in order to promote the sustainable distribution of local shops and services, uses providing essential goods and services will be promoted in these locations through the provision of new shopping and services, including as part of new residential or residential-led development, where the scale of the provision is justified and appropriate to meet a local</p>	<p>Support noted. Proposals in such locations should incorporate uses which can be demonstrated to serve a local population, such as convenience shopping, and it must be demonstrated as part of an application that this need is not already met locally or cannot be met through existing provision (in or outside of the borough's centres and parades). This is consistent with the Government's town centre first approach.</p> <p>Please note that Map 19.2 Areas not within 400m of a Town or Local Centre has caused some confusion (e.g. around existing provision in areas not identified by the boundaries) and it is therefore not included within the revised draft Local Plan. The policy wording alone is considered sufficient and the burden should be on the applicant to demonstrate its applicability as part of the planning application.</p>	No changes required. Clarification should however be made within the supporting text to specify that such development is only acceptable when it meets an unmet need.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>need, and it would not harm the vitality and viability of any of the borough's centres or Parades.</p> <p>This policy is strongly supported by our client, which would enable the provision of new shops or services as part of any future redevelopment of the Site, serving both the Site and the surrounding area.</p>		
Mr Tom MRTPI	National Planning Adviser Theatres Trust			241	Policy LP48	The Trust is also supportive of this policy, in particular part B which incorporates the 'Agent of Change' principle protecting the borough's valued venues and facilities from the negative impacts of incompatible neighbouring development.	Support noted.	No changes required.
Monica Tross	Sectary to planning committee Battersea Society			826	Policy LP48	<p><b>LP 48 Evening and Night-Time Economy</b></p> <p>The night-time economy is crucial to the resilience of many town centres, especially Clapham Junction; and it has been badly hit by the pandemic. We believe its importance is underplayed in the Plan, and we have particular concerns about the policy to support further developments for this use in the Focal Points of Activity along the River Thames. This puts the vitality of town centres at risk as they seek to recover from the pandemic.</p>	<p>The supporting text identifies the important contribution that the night-time economy makes, and such uses are now explicitly supported in the boroughs centres through the introduction of this policy. The strategic role of the different centres with respect to the night-time economy is recognised within the Area Strategies, in line with the London Plan's Night-Time Economy Classifications, and should be added to the supporting text (see comment 1116).</p> <p>The Council is scoping options to produce a Night Time Strategy (NTS) which will take a coordinated, multi-disciplinary approach to activities occurring between 6pm and 6am, with the aim to improve inclusion, safety and accessibility for all the borough's night time workers and users. The supporting text should make reference to this study, with which applications for night-time uses should comply.</p> <p>The supporting text of Policy LP48 clarifies that applications for town centre uses which serve the night-time economy and which are proposed within Focal Points of Activity must still meet the sequential test, as set out within the NPPF, to ensure that the viability of proximate town centres is not harmed. That notwithstanding, Part A.1 refers only to night-time economy uses which are also town centres uses (a more limited definition sought by this policy), and also therefore repeats the policy approach already outlined for such uses within LP 45 (Development in Centres). To avoid repetition, it should be removed, referring only to compliance with the London Plan's Night-Time Economy Classification. Cross-reference to Policy LP 45 should be included in the supporting text.</p>	<p>Amend LP 48 to remove locational requirements, which only pertain to town centre uses supporting the night time economy, and for which the policy position is already set out within LP 45.</p> <p>Amend the supporting text to include reference to the Borough's intentions to develop a Night-Time Economy Strategy.</p>
Hassan Ahmed	GLA			1116	Policy LP48	<p><b>Evening and night-time economy</b></p> <p>The Mayor welcomes reference to his Night-Time Economy Classifications in part A of draft Policy LP48. This reflects paragraph 7.6.3 of the PLP which defines the classification. Wandsworth should set out clearly that Vauxhall and Clapham Junction both have a night-time classification of NT2, as set out in Table A1.1 of the PLP, which means that these are recognised as being areas of regional or sub-regional importance. Putney, Tooting and Wandsworth all have the classification NT3 which means that these are areas with more than local significance. Each night-time area will have its own character, which should be recognised and supported to maintain and enhance the rich diversity of London's night-time economy.</p>	Support noted. The London Plan Night-Time Economy Classifications are identified within the relevant Area Strategies, but could also be included within the supporting text for further clarity.	Amend the supporting text to provide further detail on the London Plan Night-Time Economy Classification of each of the borough's centres, where appropriate.
Monica Tross	Sectary to planning committee Battersea Society			827	Policy LP49	<p><b>LP 49 Markets</b></p> <p>The markets in Northcote Road, Battersea High Street, Balham, Tooting and elsewhere in the borough play a vital role in supporting the vibrancy of local and town centres. But they have suffered acutely in the pandemic. Hence we are concerned by the suggestion here that new markets should be supported when the Council's priority should be to ensure that existing markets are sustained and enhanced.</p>	The NPPF requires that planning policies should retain and enhance existing markets and, where appropriate, consider the creation (or re-introduction) of new ones. In accordance with this, the Local Plan supports new markets, which could aid the recovery of high streets and parades within the borough, or serve new markets realised through development (for example, in areas such as the Wandle Delta or Nine Elms). It is agreed, however, that new markets could potentially compete with and negatively impact the operation of existing markets, and demonstration that this will not be the case should be a consideration in their approval. It is noted that the policy states that new markets will be supported "particularly where they will increase the variety of the market offer in the borough", which further seeks to promote diversification of the offer.	Amend Policy LP 49 to stipulate that permissions for new markets or extensions to existing markets will only be granted where it can be demonstrated that they will not negatively impact the operation of other markets. The Policy has been reordered to prioritise existing markets over new market provision.
Covent Garden Market Authority		Mr Philip Robin	Consultant Jones Lang Lasalle	1097	Policy LP49	<p>Policy LP49</p> <p>CGMA supports Policy LP49 that confirms proposals for new ancillary retail market pitches open to the general public will be permitted within NCGM, where these do not adversely impact the primary wholesale operation of the site and the recognition at paragraph 19.43 that NCGM contributes significantly to the economic, cultural and social life of the Borough. These policies should help</p>	Support noted.	No change required.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						support firstly, CGMA's ambition for NCGM to become one of London's food hubs, secondly, supporting other use of the market during non-core operating periods such as the Sunday Market, and thirdly to help create an important focus in the Nine Elms area.		
Monica Tross	Sectary to planning committee Battersea Society			828	Policy LP50	<b>LP 50 Meanwhile Uses</b>  We share the wide consensus that pop-up shops and other enterprises can play a key role both in bringing life to local and town centres and in acting as seedbeds for new enterprises. We therefore support measures to encourage landlords to sponsor and promote pop-ups; but we are disappointed that the Plan – despite repeated mentions of encouragement – offers little detail on the kinds of encouragement or support that will be provided by the Council. The policies set out here are inadequate.	The draft Local Plan sets out an overarching strategy for the use of land: this new policy outlines the locations, circumstances and types of meanwhile and pop-up uses will be supported, thereby providing greater certainty for developers and users of the space. It is not the position of the Local Plan to outline particular forms of support, such as financial contributions, that will be available for specific meanwhile uses. The Council would welcome the opportunity to work with potential users, who should contact the Economic Development Office.	No changes to the Local Plan are considered necessary.
Dr David Curran	Lavender Hill for Me			1185	Policy LP50	LP50 Meanwhile Uses  No comment other than to offer general support for this policy. Lavender Hill has seen numerous Meanwhile Uses (mostly following or prior to major developments and upgrades of retail units) and these have been beneficial to the health of the street as a whole.	Support noted.	No changes required.
VSM Estates	VSM Estates	Freya Turtle	Associate Director Turley Associates	1068	Policy LP50	<b>For full context, see the attachment with comment 1058</b>  Policy - LP50 Meanwhile Uses  London Plan conformity - VSM considers that LP50, which supports meanwhile uses, is consistent with London Plan Policy D8.  NPPF: positively prepared - No comment.  NPPF: justified -No comment.  NPPF: effective - No comment.  NPPF: consistent with national policy - No comment.  Suggested amendments to policy - No comment.	Support noted.	No changes required.
John Turner	Associate Ballymore Group	Tom Lawson	Senior Planner Rolfe Judd Ltd	1313	Policy LP50	<b>See attachment on comment 1294 for full representation and context</b>  <b>LP50 - Meanwhile Uses</b>  As discussed above Ballymore is also a keen supporter of meanwhile uses and strongly supports their introduction on development sites, to mitigate the impact of construction and boost the area in the interim period, will be supported.	Support noted.	No changes required.

## Chapter 20 - Sustainable Transport

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Caroline Norrie				19	General Sustainable Transport Comment	Roads - LTN - not working and need to be re-considered. Bike routes should be off main roads/across commons/up side streets. Current scheme opposes social justice - those who can afford to live on nice streets are now even more favoured.  Traffic around Springfield site needs monitoring. Appalling already.	Comment noted.	No changes to the Local Plan are considered necessary.
Caroline Hartnell				199	General Sustainable Transport Comment	Encouraging Wandsworth residents to use their cars less and instead use public transport, cycling and walking is absolutely vital. Given the rapid abandonment of LTNs when faced with pushback from car drivers, the Council should call a citizens assembly to work out how to achieve more sustainable transport in the borough - which is crucial both to reduce carbon emissions and to improve residents' health.	Comment noted.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			341	General Sustainable Transport Comment	Crossrail 2 is now effectively dead. <b>Nothing here does anything for Roehampton, the 'other regeneration area' conspicuously not mentioned.</b>  <u>Electric charging</u> – the Plan makes several references to electric charging facilities in certain circumstances. We would support this but emphasise that it is fundamental that for electric charging to be adopted more widely and for the charging facilities to be fully utilised and therefore economically viable for the provider, care must be given to ensure that the location and type of charge point is compatible with all or as many models of vehicle as possible. Rollout of charge points is currently hindered because certain vehicles are excluded by the quality/type of the charging facilities offered.  <u>Urban Logistics Hubs</u> – we support the wider use of these for 'last mile deliveries' by electric vans or cargo bikes which serve a limited spatial range. They should be located in sustainable urban locations, in areas that are connected to the wider road and rail networks, railway stations and town centres.  <u>Delivery Vehicles</u> - we understand and support the move to car free developments, which means no off street parking. Covid 19 has accelerated the trend to online shopping but it is here to stay. This has resulted in a huge increase in delivery vans stopped outside residential premises whilst the driver delivers, often blocking traffic. Major developments and others that can should be required to provide delivery bays for this.	PM7 Roehampton Regeneration Area references the Local Implementation Plan which will improve the transport environment in Roehampton.  Paragraph 20.31 provides more detail on where and how the borough expects provision of rapid electric vehicle charging facilities to come forward. London Plan Policy T6 provides additional guidance for the provision of electric vehicle charging infrastructure.  LP53 Parking, Servicing, and Car Free Development (e) supports developments where adequate off street servicing arrangements are made for commercial vehicles and general servicing.	Additional information on Urban Logistics Hubs has been added to the glossary and the supporting text to identify suitable locations and define what they are.
Lois Davis	Co-ordinator Wandsworth Green Party			460	General Sustainable Transport Comment	The Local Plan represents a spatial vision and strategy for the borough, and therefore our comments on the transport elements of the plan are predominantly from a spatial perspective. Generally, we support the comments on specific proposals presented by local campaign groups Wandsworth Living Streets and Wandsworth Cycling Campaign.  Our streets represent not only a transport network, but our most significant public space. That this public space has gradually come to be dominated by motor traffic has occurred, without plan or consultation, over a long period of time and has become very difficult to challenge. However, in the context of the Climate Emergency, challenge it we must. We strongly welcome the ambitions of the Local Plan to promote mode shift to sustainable travel, promote 15-minute neighbourhoods etc. However, these ambitions will not be achieved without a plan to reallocate valuable and limited public space away from vehicles (traffic and parked) and towards people and the environment. We do not see a plan or policies for doing this, especially on existing residential streets and neighbourhoods.	Comment noted.	No changes to the Local Plan are considered necessary.
Lois Davis	Co-ordinator Wandsworth Green Party			465	General Sustainable Transport Comment	Section 20: Sustainable Transport Section 20 should include the diagram of the sustainable transport hierarchy (WESS), with walking at the top and private motor vehicles at the bottom. We support the policies LP51 - LP54 as far as they go. However, these policies are focussed on setting criteria for new developments and do nothing to address use of public space in existing residential neighbourhoods (the majority of the borough). Existing residential neighbourhoods are significantly ignored in this Plan and associated policies.  For example, car parking is to a large extent wasted space, since most vehicles are stationary for the majority of the time (95%?). Restricting space for car	Chapter 15 Tackling Climate Change address the importance of the WESS as does paragraphs 2.35-2.40. The Wandsworth Local Implementation Plan and the Corporate Business Plan both set out how the existing transport environment can be adapted to meet the aims mentioned above.	No changes of the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						parking is an obvious way to free up space to achieve the Plan's other aims e.g. Placemaking and People First. While this is addressed for new developments and town centres, no attempt is made to address the same situation in existing residential neighbourhoods. We understand that there are plans to review parking charges within the borough, however we believe that the Local Plan is an opportunity to look at the issue from a spatial perspective and set policies and targets for an equitable allocation of public street space.		
Monica Tross	Sectary to planning committee Battersea Society			830	General Sustainable Transport Comment	<b>20 SUSTAINABLE TRANSPORT</b>  The draft fails to recognise the significance of transport links for those living and working in the borough. It does not address the major barriers there are for cyclists and pedestrians because of some overloaded junctions and through routes. This has been noticeable for some years as new developments have been approved and built with often poor provision of complementary public transport or safe pedestrian linkages. We are not convinced that the general nature of the policies set out in this chapter will address these issues any better in the future.	Comments noted.	No changes to the Local Plan are considered necessary.
Susie Morrow	Chair Wandsworth Living Streets			652	General Sustainable Transport Comment	Dear Sir/Madam,  Thank you for the opportunity to respond to the Draft Local Plan ("dLP"): Pre-Publication version consultation.  Wandsworth Living Streets ("WLS") is a local group of the UK charity, Living Streets. Our members include local residents, families with young children, active senior sand people who run local businesses, charities, and other community projects. Our members have a variety of specific place making expertise as well as general community interest.  We have a vision for the Borough to make it the best place to live, to work, to travel, to relax and to play. We are entirely focused on enabling the making of thoughtful, engaging, lively, human, bio-diverse and community-led spaces and places that enable social cohesion, community building, active play and healthy, fulfilling lives. We want all our places to achieve their potential, and we believe they can do so with the right policies and appropriate focus on inclusive engagement, and by adopting and implementing best practice from both London, across the United Kingdom and internationally.  Our streets, estates, town centres and open spaces should prioritise local people living, working and playing. Transport across and through the Borough should be prioritised according to the Sustainable Transport Hierarchy, and focus on enlivening, rather than diminishing our sense of place. Our streets should be free from road danger and be improved in a way that meets the objectives of the Climate Emergency and the Wandsworth Environment and Sustainability Strategy (WESS), which should act as a guide for all planning decisions and expenditure on maintenance and enhancements of the public realm. Our streets and public spaces should facilitate clean air, and improve tree and canopy cover, planting and wildlife whilst mitigating water run-off and flooding. Our children should be afforded to play outdoors with their friends in the spaces outside their homes without fear and our neighbours should be enabled to build strong local community networks and friendships.  We believe local people should be given "agency" over the space around their homes in furtherance of the public good, that everyone should be involved in placemaking across all demographics and income groups, and that consultations should be significantly improved to equitably address the aspirations of our diverse community.  The 2023 Local Plan should be forward looking, not just in terms of the physical design of our public spaces, but through the use of current and emerging	Comments noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>technology and data, and across design, decision making, streets, transport, energy production and waste management.</p> <p>We look forward to having our comments taken into account in the next iteration of the emerging Local Plan.</p> <p>Yours faithfully</p> <p>Wandsworth Living Streets 28 February 2021</p>		
Susie Morrow	Chair Wandsworth Living Streets			655	General Sustainable Transport Comment	<p>2. Legacy Streetscape</p> <p>In paragraph 1.9 we note that WBC intends "to be the greenest inner London Borough" and where businesses, town centres, people and neighbourhoods thrive. Whilst The dLP includes much detail on town centres and open spaces, we note that our legacy streetscape and neighbourhoods, built predominantly from circa mid-1800s to the present day, is the predominant land-use across the Borough and yet this is not formally recognised within the dLP. We would therefore like to see a new section specifically dedicated to our legacy streetscape, similar to section "21. Green and Blue Infrastructure and the Natural Environment", and aligned with the WESS and Walking &amp; Cycling Strategy.</p> <p>In this new section, we would expect it to cover, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>Garden strategy – ensure local residents are supported in maintaining and enhancing green space at the front and rear of their homes to support bio-diversity, noise suppression, and Summer heat and water run-off mitigation. For example we note a proliferation of the use of plastic "grass" in the Borough which is environmentally harmful, yet residents don't necessarily have the information to make informed decisions – WBC can play a leading role in ensuring all residents make informed choices that align with the WESS.</li> <li>Pavement strategy - Pavement space should be a protected public asset. The dLP policies should ensure total pavement space on each street is increased rather than diminished. We are opposed to measures which sacrifice this space to enable or encourage more driving, such as pavement-placed EV chargers and electronic advertising hoardings (e.g. BT InterLink)</li> <li>Kerbside strategy – we ask WBC to consider all potential uses of our kerbside for now and the future, aligned with the WESS (and other relevant strategies, notably the Walking and Cycling Strategy, and the Active Wandsworth Strategy) and which could include a much broader use of this valuable asset, including the potential for highly efficient, technology-enabled waste management and recycling, pocket parks, dwell spaces for adults and seniors, play spaces for children, energy generation, enhanced tree cover and re-greening, and better biodiversity. Residents should be given more agency and control over the space outside their homes – if they don't own a car, residents, individually and collectively should be granted permission for alternative, community and environment-enhancing uses.</li> </ul> <p>Parking strategy – we would like to see an update and expansion of CPZs better aligned to changing local transport needs, and which address significant weekend parking issues. We note the streets are often busier midday on a Sunday than during the week, and CPZs need to reflect this particularly in respect of new developments which change driving patterns, whilst ensuring WBC retains parking income. Too often, more relaxed parking controls at weekends often inhibit cycling in particular, making inclusive family cycling, whether for transport or recreation, extremely challenging and less safe. We continue to advocate for a review of Wandsworth's parking strategy with the aim of making charges better reflect the cost of car parking to wider society. In this context, we note that Wandsworth has the highest proportion of road space (nearly 20%) taken up by residents' on street car parking of any London borough; and the high value of land allocated to residents' on street parking.</p>	<p>LP5 Residential Extensions and Alterations A(9) resists the use of non permeable surfaces such as plastic grass for existing residential properties. Wandsworth's pavements are an important asset which may be flexibly altered to help meet the sustainable transport goals of increasing active travel journeys. LP51 Sustainable Transport supports the introduction of parklets to help make the most of these spaces. The Local Plan does not have authority to administer the types of changes to CPZs that have been described.</p>	<p>No changes to the Local Plan are considered necessary.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Cllr Graeme Henderson and Cllr Rigby	Earlsfield Labour Party			930	General Sustainable Transport Comment	<p>Transport and planning the streets to make them people friendly</p> <p>Earlsfield Ward straddles either side of Garratt Lane (GL). 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.</p> <p>We welcome the Plans for the north of the Ward, but are concerned that they may be delayed due to Covid 19. We believe that the need for Active Travel and a resident, pedestrian and child friendly environment requires these plans to be implemented as soon as possible.</p> <p>Air Quality is a particular problem. In 2019 we arranged for "Toxic Toby" a teddy bear with built in air quality measuring equipment, to sit by Earlsfield Station one day. The results showed heavy pollution in the air, three times over the World Health Organization recommended safe limits. This is particularly concerning given the location of schools, such as Floreat, Earlsfield and Garratt Park in close proximity to GL. Poor air quality has a particularly serious impact on the lung capacity and health of young people.</p> <p>We need a much more strategic approach to re-designing our streets, particularly the main and arterial roads, using funds from the Community Infrastructure Levy (CIL) to make them much more friendly to cyclists and pedestrians.</p> <p>Almost all of the major developments in Earlsfield since 2018 have cited the existence of Earlsfield Stn and its fast links to London as an example of a sustainable transport policy. Yet there are limits to the capacity of Earlsfield Stn. Prior to Covid the platforms were often overcrowded during rush hour. Any new development must be accompanied by an equivalent planned increase in environmentally sustainable public transport as well as measures to encourage Active Travel.</p>	<p>LP59 Urban Greening Factor and LP51 Sustainable Development will require new development along Garratt Lane to provide additional greening features and provide safety inline with the Vision Zero Action Plan. LP14 Air Quality, Pollution and Managing the Impacts of Development and the Air Quality Action Plan address the issues of air quality in the borough and suggest proposals to address these issues. The Wandsworth Corporate Business Plan 2020 outlines several transport projects that will improve sustainable transport in the borough including the introduction of cycling parking facilities at rail stations to facilitate intermodal transport. The Walking and Cycling Strategy also provides actions for how active travel can increase in the borough.</p>	No changes to the Local Plan are considered necessary.
	Wandsworth Cycling (London Cycling Campaign)			960	General Sustainable Transport Comment	<p><b>2.Feedback and detailed comments</b></p> <p>For many residents of Wandsworth, the choice of cycling as a mode of travel in the Borough continues to be severely restricted by the significant shortcomings in the quality and provision of the current infrastructure.</p> <p>Our detailed and specific feedback is provided in the comments on the yellow highlighted text in the attached pdf.</p> <ol style="list-style-type: none"> <li>Cycling space must be safe</li> </ol> <p>This means safe to people who are new to cycling in London, people less confident cycling, young families, and the more risk adverse. It must be safe throughout the journey – this must include the destination. If the redeveloped areas do not accommodate people cycling, it undermines cycling as a viable option for travel.</p> <ol style="list-style-type: none"> <li>Provision must be made for both cycling and walking</li> </ol> <p>Safe space is required to protect people cycling from vehicles, just as it is required to protect people walking from vehicles. Safe space means traffic free as far as possible. Where space is shared with vehicles, clear priority for people cycling is required.</p> <p>The current safe space for cycling in Wandsworth is extremely limited. Of the 440km of roads (2.22) only a very small minority provide any genuinely safe space for people cycling. The best examples are on the TFL implemented CS7 and CS8, however these are patchy. With regard to the observation:</p> <p>Although Tooting is located on the CS7 cycle superhighway, offering local people a faster and safer route into the City; certain sections of the bicycle link</p>	<p>Comments noted. Specific comments have been addressed throughout the document. The Council is committed to enhancing both walking and cycling throughout the borough and the Walking and Cycling Strategy explains this. The Local Implementation Plan and the Corporate Business Strategy identify several projects which the Council is undertaking to improve the active travel environment in Wandsworth.</p>	Reference London Cycling Design Standards has been added to the supporting text for LP53 Parking, Servicing, and Car Free Development (Now LP51).

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>are of poor-quality and require an upgrade, and issues of cars parking on this amenity are also prevalent. (p.142)</p> <p>we recommend that reference is made to the temporary improvements made by TFL in 2020, and that support will be given for permanent changes to separate people cycling from vehicles, and relocate parking</p> <p>We welcome the forthcoming improvements to for cycling on Queenstown Road and Garratt Lane, and we strongly urge the council to implement similar measures across the borough.</p> <p>We do not suggest cycling space should be prioritised over walking space – rather that adequate provision is required for both.</p> <p>3.Requirements not suggestions</p> <p>More of the improvements need to be required of Developers rather than recommendations or suggestions.</p> <p>In order to ensure that the cycling improvements are of a sufficient standard to achieve the vision, there must be an overarching reference to the relevant standards, specifically:</p> <p>(i)TfL's London Cycle Design Standards and Quality Criteria <a href="https://tfl.gov.uk/corporate/publications-and-reports/cycling">https://tfl.gov.uk/corporate/publications-and-reports/cycling</a></p> <p>(ii)The national Gear Change <a href="https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england">https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england</a></p> <p>(iii)LTN 1/20 policies <a href="https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120">https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120</a></p> <p>The vision for cycling in Wandsworth is bold, the prize of success is huge, but the ground to be covered is significant.</p> <p>We trust our feedback will be favourably received and incorporated into the final version of the local plan.</p>		
Susie Morrow	Chair Wandsworth Living Streets			667	General Sustainable Transport Comment	<p>PTAL – please include a PTAL map</p> <p>Sustainable Travel Hierarchy – please include an image of this in Section 20</p>	The PTAL map can be found at the following address: <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat">https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat</a> It is preferred that this is used as it is interactive and will be updated regularly.	No changes to the Local Plan are considered necessary.
Julie McPhillips				981	General Sustainable Transport Comment	<p>There are lots of references to walking and cycling and taking out parking spaces. There doesn't appear to be much thought for the elderly residents or those who drive for a living or necessity. I believe the roads should be kept open and of use to all forms of transport. Lets face it, the transport links in certain parts of the borough are not great. I can see the ideal is a green car free borough but I believe this will be detrimental and make certain areas unsafe. As we live under the flight path to Heathrow, I think you should speak to the head of Aviation and take the pollution created by the aircraft into account before penalizing car drivers and owners. As a woman I am not happy for myself or my young nieces to be travelling alone in a car ordered digitally. I say this as it would appear that is your preferred way forward and I am happier and feel much safer if I can drive myself and be available to pick up teenagers and the young women in my family. Without the use of a private car, there are many people who will be forced into social isolation</p> <p>I would also like to see certain areas to be designated bicycle and scooter free so that in many of the green and blue spaces suggested, pedestrians can feel safe to take a leisurely walk without the fear of being run over by one of these speeding menaces. I'd also like to see you add something about speeding</p>	The sustainable transport policies are intended to reduce the need for unnecessary non-active travel journeys but never remove them entirely. Car parking will always be available in the borough however we want to encourage individuals to use active travel if they can. It is the intention of the Local Plan and the supporting documents to create more cycling infrastructure to increase the safety of pedestrians. It is outside the remit of the Local Plan to enforce cyclists to stay on roads.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						cyclists who are using our borough as a Velodrome and ensure they stick to the roads and not take over footpaths in the green and blue areas.		
Hassan Ahmed Hassan Ahmed	GLA			1122	General Sustainable Transport Comment	<p><b>Transport</b></p> <p>We welcome application of Placemaking, Smart Growth and People First principles in developing the Area Strategies, in particular, the need to manage traffic and provide good public transport connectivity, support active travel and work towards the 15-minute neighbourhood. However, the Plan should include policies and measures to ensure that all development contributes towards achieving the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan as well as the Vision Zero road safety objective.</p> <p>Development principles in the site allocations should be applied consistently throughout the place policies in relation to transport and other matters. Only a few sites are identified as suitable for car free development, yet the London Plan requires all development in the Opportunity Areas covering Nine Elms and Clapham Junction as well as all areas of PTAL 4 – 6 in inner London to be car free. A more consistent approach should be taken for all sites where car free development applies. It would be helpful to provide the PTAL for each site allocation.</p> <p>We welcome the strong emphasis on applying the Healthy Streets Approach and the positive approach to encouraging active travel. We also welcome strong policies on safeguarding and retaining transport land including specific sites and support for improved bus services and infrastructure including waiting facilities and stands.</p>	Reference to the Mayor's Transport Strategy and the Wandsworth Local Implementation Plan can be found in paragraph 2.44 and 20.1.	References to the Mayor of London's Vision Zero Action Plan has been added to the supporting text of policy LP51 Sustainable Transport (LP49).  The reference to car free development in the Wandsworth Bridge Cluster Site Allocation has been removed.  LP53 Parking Servicing and Car Free Development (LP51) has been amended to be in line with the London Plan.
Dr Rosena Allin-Khan				1193	General Sustainable Transport Comment	<p>(ii) Active Travel:</p> <p>I embrace moves to promote active travel, which will bring Wandsworth in line with the Mayor of London's position on air pollution and Transport Strategy, as well as promoting healthier lifestyle choices through walking or cycling.</p> <p>I also welcome proposals that will reduce carbon emissions and have a positive impact on the environment.</p> <p>While there is a general consensus in Tooting that pedestrian access needs to be expanded, and most will be sympathetic with this, I believe that any developments that will seek to widen pedestrian areas should be done with the full consultation of residents, particularly in light of the recent trial of the Low Traffic Neighbourhoods (LTNs) in summer 2020. Full consultation will reduce the likelihood of widespread disruption and discontent seen previously.</p> <p>I also believe that the Council should promote expanded pedestrianisation through the positives of cleaner air in the wake of the coronavirus pandemic and the positive benefit this will have on residents' health.</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Riccardo Composto	Tooting Healthy Streets			1285	General Sustainable Transport Comment	<p>See attachment for representation</p> <p><b>Comments on 20 Sustainable Transport</b></p> <p>At some point in this section there should be reference to promoting and creating space for Cycle Hire schemes (the TfL scheme requires land for docking stations).</p>	The Corporate Business Plan and the Wandsworth Third Local Implementation Plan provide details with regards to the promotion of Cycle Hire Schemes	No changes to the Local Plan are considered necessary.
	Wandsworth Cycling (London Cycling Campaign)			231	20.4	The plan needs to specifically reference (i) TfL's London Cycle Design Standards and Quality Criteria; (ii) the national Gear Change and (iii) LTN 1/20 policies - this is to ensure new cycling schemes meet up-to-date standards and best practice. This quality standard needs to be applied as a requirement throughout	Comments noted.	Paragraph 20.7 has been updated in response to this comment.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>For ease of reference these may be found at (i) <a href="https://tfl.gov.uk/corporate/publications-and-reports/cycling">https://tfl.gov.uk/corporate/publications-and-reports/cycling</a></p> <p>(ii) <a href="https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england">https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england</a></p> <p>(iii) <a href="https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120">https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120</a></p>		
Dr Samuel Clifford				568	20.4	<p>WBC should embark on an ongoing series of consultations with residents and business owners around the conversion of street space from on-street parking to cycle parking, bike lanes (including contra-flow) and widened footpaths. Cyclists and pedestrians require space to be allocated to them which is free from encroachment from motor vehicles; as such, there should be no pavement parking allowed in WB. Where the shift from part-pavement to fully on-street parking results in an unsafe narrowing of the roadway, the aim should be to remove the bays altogether and redesign the road to make cycling and walking safer and to enforce a 20mph speed limit (rather than relying on signage only).</p> <p>Footpaths should be widened to meet DfT guidelines as well as guidelines about accessibility. This is important not just in terms of social distancing for COVID-19 but on the principles of livable streets prioritising people over vehicles. Where expansion of footpaths to meet legal obligations around access for disabled pedestrians and provision of bus stops, etc. would reduce in severe narrowing of the road, WBC should consider the removal of parking spaces as a priority and the conversion of the street to one-way operation if there is still insufficient road space left. If necessary, some streets may have to be converted from two-way general traffic with insufficient footpaths to two-way bike lanes with sufficient footpath space. There is no moral argument for taking what little space pedestrians have from them to provide for the storage of vehicles.</p>	The Corporate Business plan provides details with regards the projects the Council is currently undertaking to provide more active travel infrastructure.	The supporting text has been updated to include reference to the Wandsworth Walking and Cycling Strategy which details how Wandsworth will become more accessible and pedestrian friendly.
Dr Samuel Clifford				569	20.5	Developments supporting sustainable modes of transport needs to be bolstered by WBC ensuring connectivity between new local business hubs, mixed use developments, etc. for said sustainable transport.	Comments noted.	No changes to the Local Plan are considered necessary.
Robert East	Senior Planning Policy Officer LB Lambeth			1596	20.5	Emphasis on reducing the need to travel and potential for home / local working / living is particularly relevant post pandemic.	Comments noted.	No changes to the Local Plan are considered necessary.
Dr Samuel Clifford				570	20.7	<p>Said cycle lanes should be segregated where possible, either fully (esp on A and B roads) or lightly (in side streets). "Paint is not protection", and a cycle logo painted on the ground affords no protection to cyclists.</p> <p>Road surfaces should be raised to meet the footpath at junctions involving an A/B road and a side street. This provides a continuous surface that signals to motorists, pedestrians and cyclists that the footpath users have priority. All other crossings must feature drop kerbs that are kept in good condition.</p> <p>Zebra crossings should replace refuge islands in order to prioritise pedestrians over private cars. The time from pressing a pedestrian crossing button to the pedestrian green phase should be reduced in high foot traffic areas.</p> <p>All cycle lanes and designated quietways or local cycle routes and associated infrastructure should be inventoried and places for improvements identified. There are many lanes and pieces of infrastructure which were built decades ago and either no longer fulfil the needs of users or meet guidelines for their provision. The removal of chicaned gates should be prioritised, as these prevent non-traditional cycles from being used on many route as well as preventing access for disabled users. While it's good to use design to prevent motor vehicles from accessing bike paths, care must be taken to ensure that the intended users are not also excluded.</p>	Comments noted.	The supporting text has been updated to include reference to the Wandsworth Walking and Cycling Strategy which details how Wandsworth will become more accessible and pedestrian friendly.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						Also generally there's just a lot of badly built or maintained infrastructure, such as the Rectory Lane footpath bikeway, which is a faded bit of paint on an uneven paved surface. This section needs an entire redesign, making a properly surfaced bikeway that is obviously separate from the walkway (with a light kerb) and not continually narrowed by parking bays.		
Susie Morrow	Chair Wandsworth Living Streets			658	20.7	To highlight the need for a new section on Legacy Streetscape, paragraph 20.7 states, "Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. This should manifest itself in the form of active travel infrastructure such as clear and well-designed cycle lanes, cycle parking infrastructure, and improvements to the main pedestrian thoroughfares". But it is clear isolated active travel infrastructure is not, in of itself, sufficient and needs to be considered in the wider context/geographical area that enables congruous, cross-Borough networks to be established, rather than simply creating isolated, unconnected pockets of high-quality networks dispersed across the Borough that do not connect residential areas, our open spaces and town centres.  We believe this section is critical in enabling the delivering of the WESS, enabling Sustainable Transport and supporting the new Walking & Cycling Strategy.	Comments noted.	The supporting text has been updated to include a reference to how new cycle infrastructure should be joined up as part of the active travel network in the borough.
Mrs Ruth Marie Pates				6	20.9	Would support all of these ambitions, but Wandsworth needs to take action. Withdrawing of the LTNs in Tooting and West Putney sends a signal that the council is not serious about this. The borough town centres and surrounding residential areas would make a terrific platform for 15-minute cities, but the council seems unwilling to truly prioritise and enable active travel. Successful schemes in other boroughs have shown the big impact that measures to prioritise active travel can have e.g. LTNs, mini-Hollands and similar schemes (e.g. increases in active travel by >10%).	Comment noted. LP51 Sustainable Transport sets out that developments in Wandsworth will be people focused and be required to meet the healthy streets objectives which promote active travel and the reduction of journeys. Paras 2.89-2.95 highlight the Council's ambition to achieve 15 minute neighbourhoods. No changes to the Local Plan are considered necessary.	No changes to the Local Plan are considered necessary.
Mr Mark Poulter				145	20.9	"Unnecessary additional journeys", what are these? Who/how are they defined? Greta Thunberg? The political commissar for the area? Should this read "reduce the need for" or "minimise the need for" non-active?  Explains that sustainable transport includes low and ultra low emission vehicles but these are dismissed elsewhere in the plan as "cars".	The Council aims to reduce the need for use of unsustainable modes of transport by encouraging the use of active travel. Guidance on this comes from the Mayor's Transport Strategy.	The definition of sustainable transport has been updated to exclude ultra low emission vehicles.
Dr Samuel Clifford				572	20.9	In terms of the hierarchy of transport, private vehicles still remain the least sustainable method of transport even if they are low or ultra-low emissions. Sustainability is not just about fuel usage but also the physical footprint required for the transport network. Private vehicles are large, often operating at less than half capacity, and pose health risks to pedestrians, cyclists and other road users beyond their emissions. Car sharing is one way around this issue, but a shift out of cars and on to foot/bike or bus/train should not just be encouraged but supported by the way our transport networks are designed. Much road space is given over to the use of private cars, either through general traffic lanes that have priority over other road users at junctions or through the provision of on-street parking on just about every side street in the borough and many main roads. In order to cause a shift in transport mode chosen, cars should be deprioritised - whether privately owned or in a car share. The needs of blue badge holders must be taken into account here, though, as their needs are different to those of non-disabled road users.	Comments noted.	The definition of sustainable transport has been updated to exclude ultra low emission vehicles.
Mr Mark Poulter				146	20.10	How can reducing transport options combat social isolation? Being forced to ride a bike will increase social isolation for many who can't or won't do it.	The Council's aims are to provide greater active travel options while also providing the necessary infrastructure for people who must use private cars for transport.	No changes to the Local Plan are considered necessary.
Robert East	Senior Planning Policy Officer LB Lambeth			1597	20.10	Trip making was already reducing pre-pandemic and future demand for transport services is uncertain / may not follow previous projections.	Comment noted.	No changes to the Local Plan are considered necessary.
Mr Robert	Chair The Putney Society			343	20.11	20.11 'Sustainable transport... can be an important factor in combating social isolation.' All transport does this. Please don't confuse taking the bus with having somewhere to go.	Comment noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Arguile								
Mrs Ruth Marie Pates				7	20.12	To date the Active Wandsworth Strategy has focused more on sport and recreation and not really progressed enabling activity as part of daily life. Links very obviously to the cycling strategy and climate action plan - and would improve access to Wandsworth's lovely parks, river and leisure centres.	Policy LP 51 (Sustainable Transport) highlights the Council's commitment to encouraging active travel and healthier lifestyles for Wandsworth residents	No changes to the Local Plan are considered necessary.
Mr Mark Poulter				147	20.13	Encourages overall amount of travel? Illusory nonsense.	Comment noted.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			344	20.13	This is the first mention of a 'Healthy Streets Approach' which should be explained.  Please also explain in what way it can also encourage the overall amount of sustainable travel in the borough.  This whole chapter is short on rigorous thinking and justification.	The Healthy Streets approach is mention within Policy LP51 Sustainable Transport paragraph B.	No changes to the Local Plan are considered necessary.
Dr Samuel Clifford				573	20.14	Healthy Streets is a very good model to follow	Comment noted.	No changes to the Local Plan are considered necessary.
Mr Nick Symons				13	20.15	Healthy Streets has at its heart 'safety'. Older people need to be able to park their cars near their houses - albeit only using them to exit Putney. They do not feel safe if they cannot park near their houses. Civic spaces also create loiterers and unsafe areas for people to walk through. The recent spate of knife robberies in Norroy can easily spread to all local streets where there is 'safe' getaway routes for thieves.	LP1 Urban Design requires that developments must minimise opportunities for crime and antisocial behaviour including terrorist activities in a site-specific manner, based on an understanding of the locality and the potential for crime and safety issues.	No changes to the Local Plan are considered necessary.
Dr Samuel Clifford				574	20.18	Minimising the number of car parks provided in new developments should be prioritised, in favour of end of trip facilities for cycling to work, storage at home (on premises, preferably).	Comments noted.	No changes to the Local Plan are considered necessary.
Dr Samuel Clifford				584	20.24	Streets with excessive parking, e.g. pavement parking that still provides for cars to use the street in only one direction at a time (e.g. where passing is impossible) should be redesigned to remove pavement parking, ensure adequate space for pedestrians, ensure adequate opportunities for mid-block crossing, and ensure that traffic is not obstructed by parked cars while still providing for a design that enforces a 20mph limit without relying solely on ANPR and motorist goodwill).	Comment noted. The redesign of existing streets to benefit active travel and improve road safety is more of an issue for the LIP rather than the Local Plan.	No changes to the Local Plan are considered necessary.
Riccardo Composto	Tooting Healthy Streets			1288	20.25	See attachment for representation  <b>20.25</b>  Given the commendable reduction in vehicle ownership highlighted in 2.26 the council should have an explicit policy of repurposing surplus on-street car parking for other uses. These could include cycling and walking infrastructure, greening, parklets, electric vehicle charging, etc.  In reference to scooters and motorcycles, we would like to see these properly catered for in town centre planning. Tooting's restaurant scene attracts a huge amount of Deliveroo/Uber Eats activity, which is not catered for by the infrastructure. New developments (such as the markets in Tooting) should be expected to accommodate and plan for the servicing needs of takeaway delivery vehicles so that drivers are able to do their jobs and co-exist with residents and other town centre users.	LP51 Sustainable Transport requires development proposals to improve the public realm with features like parklets and improve placemaking. LP53 Parking, Servicing, and Car Free Development I(2) requires developers to show that parking provision for scooters and motorcycles is provided and not creating an overspill into other areas.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						-ENDS-		
Mr Nick Symons				14	20.26	Whilst you quite rightly mention provision for disabled people - there is no mention of the fact that many older people who do not necessarily use their cars for daily journeys within Putney still need to park their cars near their houses. Current car insurance stipulates this. Many have already gone electric or hybrid. But much more consideration should be given to the needs of the older people to feel safe. <i>Healthy Streets</i> focuses on the need to feel safe and not risk getting mugged by having to walk through unsafe civic spaces which attract loiterers and thieves. These spaces will not be policed any more than the area in Norroy Rd where muggings are rife.	LP1 Urban Design intends for development to minimise opportunities for crime and antisocial behaviour including terrorist activities in a site-specific manner, based on an understanding of the locality and the potential for crime and safety issues. For those elderly people who are disabled, the Local Plan ensures developments provided disabled parking through LP53 Car Parking, Servicing and Car Free Development. For elderly people who are not, the Local Plan parking standards are appropriate.	No changes to the Local Plan are considered necessary.
Kin Development		Ben Ford	Director Quod	1054	20.26	Background and Wandle Delta SPD comments are included in the attachment in comment 1025  <u>Underlined is text which should be removed. In bold is new suggested text</u> <b>Paragraph 20.26</b> states that development should seek to provide the minimum realistic amount of car parking for the site, without undue risk of overspill parking onto surround streets.  We consider that Policy 53(K) and supporting paragraph 20.26 should include support for on-site parking for family and retirement housing, which would itself negate the risk of overspill parking that could be created by these users who require access to a vehicle.  On behalf of Kin, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level, or circumstances affecting the Former Gasworks site.	London Plan Policy H13 Specialist older persons housing (B) (5) explains that specialist older persons housing should deliver pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances. The London Plan defines family-sized units as 3 bed + units and they will be car free if built in areas with a high PTAL.	No changes to the Local Plan are considered necessary.
Dr Samuel Clifford				585	20.28	I fully endorse the move from private car ownership to car club usage, as many cars are parked on street as long-term storage rather than being associated with any particular socially or economically beneficial activity.	Comment noted.	No changes to the Local Plan are considered necessary.
Dr Samuel Clifford				586	20.29	WBC needs to massively ramp up the installation of secure on-street parking for bicycles. The rollout of cycle hangars is embarrassingly slow and if a suitable private provider cannot take up the work to meet demand, council should embark on the public works project itself. Sheffield stands are useful for short-term storage, but overnight secure parking in hangars (or sheds, or similar) provides those who do not have storage at their residences (e.g. flats with narrow entryways leading to stairs, flats at second floor or above without elevators) an opportunity to engage in cycling more often.  As multiple bikes can fit in the storage space of one car, the provision of secure, on-street cycle parking will help drive a shift from cars to bikes for transport and clean up the streetscape, including sight lines for all road users.  Provision must also be made for non-traditional cycles such as cargo bikes, hand cycles, and adult tricycles.	The Wandsworth Local Plan, the Local Implementation Plan, and the Corporate Business Plan all set out ways that the Council is working to correct this by implementing more cycle parking provision. The Council is preparing a new Walking and Cycling Strategy that will address these concerns in more detail.	No changes to the Local Plan are considered necessary.
Dr John Fletcher				547	20.29	In residential areas of Wandsworth there is no cycle parking provision and we are expected to pay for a bike locker and this is a similar cost to a car parking permit.	The Wandsworth Local Plan, the Local Implementation Plan, and the Corporate Business Plan all set out ways that the Council is working to correct this by implementing more cycle parking provision. The Council is preparing a new Walking and Cycling Strategy that will address these concerns in more detail.	No changes to the Local Plan are considered necessary.
Mrs Ruth Marie Pates				8	20.30	Agree - Wandsworth could be much more ambitious in its implementation as there seems to be a large unmet demand.	The Wandsworth Local Plan, the Local Implementation Plan, and the Corporate Business Plan all set out ways that the Council is working to correct this by implementing more cycle parking provision. The Council is preparing a new Walking and Cycling Strategy that will address these concerns in more detail.	No changes to the Local Plan are considered necessary.
Robert East	Senior Planning Policy Officer			1600	20.33	20.33 There is ambiguity as to when permit free development will be required – a clearer statement is suggested.	The existing language is considered sufficient.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	LB Lambeth							
Robert East	Senior Planning Policy Officer LB Lambeth			1601	20.33	20.33 There is ambiguity as to when permit free development will be required – a clearer statement is suggested.	The existing language is considered sufficient.	No changes to the Local Plan are considered necessary.
Dr Asif Din				251	20.35	Cycling bridges should consider existing communities on the river	Comment noted. LP54 Public Transport and Infrastructure (A)(1)(a) requires consultation to have been undertaken with operators, owners, and stakeholders.	No changes to the Local Plan are considered necessary.
Alan Pates				31	Map 20.1	<p>The map 20.1 is a deceit. It claims to show a cycle network over the Borough. A number of roads indicated as cycle routes are one way only so do not form a network and many others are no more than cycles painted in the road on busy A roads. The map indicates a poor provision anyway and if you strip out the deceits then it is clear that what is left should be an embarrassment to the Council. Where are the definite proposals with a defined timescale for their implementation?</p> <p>There is a complete lack of safe cycling in many parts of the Borough and no wonder cycling numbers are low. A Borough that had a commitment to active travel would be prioritising active travel and not just writing what appear by what is visible on the ground to be hollow paragraphs about it.</p> <p>I would hope that the Council might reconsider its priorities and set out proper definite policies with a timescale for their implementation within the new Local Plan. I would love to be proud of my Borough, if it were to be the one to actually take the lead within London to address Climate Change, health and wellbeing by effective, implemented policies.</p>	<p>Comment noted.</p> <p>The Cycling Routes map contains all dedicated cycling routes regardless if they on roads or if they are one way.</p> <p>Wandsworth Third Local Implementation Plan and the Wandsworth Cycling Strategy provide more details as to how cycling will grow in the borough.</p> <p>The Corporate Plan includes several projects to implement new cycle lanes and create more cycle infrastructure in the borough.</p> <p>LP51 Sustainable Transport aims to create real change in the borough by encourage more cycling.</p>	No changes to the Local Plan are considered necessary.
	Wandsworth Cycling (London Cycling Campaign)			232	Map 20.1	<p>How does this map sit in relation to text and other maps? How are the proposed routes to be funded?</p> <p>We note that Putney High Street is included within the 'cycle route network'</p> <p>How will the quality of the infrastructure on these routes be made fit for purpose (i.e. safe and accessible for all)?</p>	This map provides a visual aid to understand the existing cycle network and some of the proposed improvements that will be made over the plan period. Routes will be funded through a variety of sources including S106 and LIP funding.	No changes to the Local Plan are considered necessary.
Dr Asif Din				249	Map 20.1	The proposed cycle route across the river does not consider the existing boat community in that location. Therefore, I object to the proposal of the bridge to this community which has had severe disruption in recent years from Riverlight and Thames Tunnel in the location.	The proposed cycle route is at very early stages and consideration for the existing boat communities will be factored into any decisions.	No changes to the Local Plan are considered necessary.
Riccardo Composto	Tooting Healthy Streets			1286	Map 20.1	<p>See attachment for representation</p> <p><b>Map 20.1</b> lacks useful detail such as:</p> <ul style="list-style-type: none"> <li>Which of the cycle routes meet current standards for quality - the map at face value suggests there is a quite comprehensive network for Wandsworth, which is not borne out by the experience on street</li> <li>The major WBC routes proposed (and currently being delivered in temporary versions) for Garratt Lane and Queenstown Road</li> </ul> <p>This map should be kept under review based on the cycle audit being conducted for the Walking and Cycling Strategy and updated to include more useful detail that enables greater understanding of what infrastructure is genuinely safe and suitable for a wide range of cyclists to meet Wandsworth's WESS objective of being 'an easy place to use, own and store and bicycle'.</p>	<p>Wandsworth Council do not have detailed information on the current standards of quality for each cycle route.</p> <p>Map 20.1 has been amended in response to this comment.</p>	Amend Map 20.1 to include Garratt Lane and Queenstown Road as cycle lanes.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Robert East	Senior Planning Policy Officer LB Lambeth			1595	Map 20.1	Map 20.1 (cycling routes) It would be useful to show how the existing and proposed Wandsworth network integrates with the Lambeth Healthy Routes Plan - <a href="https://www.lambeth.gov.uk/better-fairer-lambeth/lambeth-transport-strategy/lambeth-transport-strategy-healthy-routes-appendix">https://www.lambeth.gov.uk/better-fairer-lambeth/lambeth-transport-strategy/lambeth-transport-strategy-healthy-routes-appendix</a> .	Map 20.1 is intended to show all the routes which Wandsworth Council have remit over and to avoid confusion we will not be including this suggestion.	No changes to the Local Plan are considered necessary.
Mrs Sarah Rayfield				32	Policy LP51	Whilst the BHS supports the national initiative to encourage more cycling and walking as part of Active Travel Plans it is imperative that Councils recognise that Active Travel ALSO includes equestrians. The government's Cycling and Walking Investment Strategy Safety Review says: "1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits" (Jesse Norman, Minister for Transport p 4). Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders. And a final point by Jesse Norman in debate: "Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing."	Comment noted.	The glossary has been amended to clarify that active travel includes all modes of transport that involve physical exertion and can benefit individual health, primarily through walking and cycling.
Mr Mark Poulter				143	Policy LP51	Written by Green Zealots to bring our towns to a halt	Comment noted.	No change to the Local Plan is considered necessary.
Mr Mark Poulter				144	Policy LP51	Para B intro. Surely freedom to travel within and outside of your area should be the primary issue at the centre of transport planning. Not the restrictions imposed on the population by these draft policies to close down people's freedom.  B2 Refers to "cars" but 20.9 states that low and ultra low emission vehicles are "sustainable". B2 should then refer to vehicles that are not low emission, not "cars".  B4 How do you make freight movement safer?  B6 What has parklets to do with sustainable transport?	The Local Plan's objectives with regards to transport are to encourage the growth of sustainable transport and to reduce the need to travel. The supporting text is intended to build off what the policy has stated and explains in more detail the exceptions that may be considered such as ultra low emission vehicles. Freight movement can be made safer through the design of new roads and developments to ensure greater off-street servicing and fewer hazards for freight drivers. Parklets relate to the Local Plan's aim to improve placemaking in as many ways as it can and they improve the transport environment for its users.	No change to the Local Plan is considered necessary.
	Wandsworth Cycling (London Cycling Campaign)			233	Policy LP51	A. "The Council will <b>support</b> proposals" - this needs to be a requirement in order to achieve the vision for active travel  B. 9. on foot AND bicycle - not just one	Comments noted. The Council finds that the language used in paragraph A is sufficient to meet the vision for active travel while also providing flexibility.	Paragraph B point 9 has been changed to reflect the comment.
Dr Samuel Clifford				571	Policy LP51	I support all aims as stated here.	Comments noted.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			342	Policy LP51	LP51.B.4 How do you make freight movement safer?  LP51.B.5 & 6 These are good ambitions, but they are not transport policy.	Freight movement can be made safer through the design of new roads and developments to ensure greater off-street servicing and fewer hazards for freight drivers.	No changes to the Local Plan are considered necessary.
Lois Davis	Co-ordinator Wandsworth Green Party			466	Policy LP51	LP51 There is too much emphasis on electric vehicles and not enough on public transport, walking and cycling. Clearer policy around creating networks that connect open and natural blue green space is key to this aspiration. Cycling Mode share ambition of 7% by 2026 is far too low. If there are 302,400 potential short cycle trips that could be made where are the safe cycle lanes to support them coming from?	The Wandsworth Local Implementation Plan 2019 and the Corporate Business Plan provides more detailed guidance as to how the active travel network in Wandsworth will be connected.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Sectary to planning committee Battersea Society			831	Policy LP51	<p><b>LP51 Sustainable Transport.</b></p> <p>It is disappointing that there is no mention, despite the cross-reference in some of the Area Strategies, to the use of urban logistics hubs for last mile deliveries by electric vans and bikes. These could play a valuable role throughout the borough.</p> <p>B: The policies here are very weak in supporting walking as a form of active travel. Covid has highlighted the extent to which residents have increasingly adopted walking as a sensible means of reaching their destinations. There is reference to supporting 'Healthy Streets' policy without clarifying this is the Mayor's policy or in the area and subject strategies setting out explicit ways in which this will be taken forward. Acknowledging the importance of walking routes and ensuring there are safe, street level crossings at major junctions, and they are well lit, should be included in this policy.</p> <p>B.6: Does the term 'parklet' mean a miniature park using a car parking space on the roadway as advocated by London Living Streets or does it mean 'public open space'. The inappropriate use of the term to refer to shrubs in two or three planters is unhelpful.</p> <p>B.9: We are supportive of provision for both pedestrians and cyclists but it is essential that, where shared, this is properly managed, ideally with separate spaces for each user rather than a free-for-all. More should be done to stop cyclists using pavements.</p> <p>Santander bike racks and free-standing Lime and other cycles for hire should have respect for pedestrians. There are instances of free standing cycles left for days in the middle of a footway and Santander racks taking up much of a pavement.</p>	<p>A parklet does refer to a miniature park which can also be classified as a public open space.</p> <p>The Wandsworth Local Implementation Plan provides detailed information as to how the Council plans to improve the active travel environment.</p>	<p>LP51 Sustainable Transport has been amended in response to this comment.</p> <p>Additional information about the CIL projects which will improve the sustainable transport network have been added to the supporting text of LP51 Sustainable Transport (Now LP49).</p>
Josephine Vos	Transport for London			738	Policy LP51	<p>TfL broadly supports this policy including the emphasis on Healthy Streets, reducing car dominance and improving conditions for walking, cycling and public transport. It would be helpful to include a direct reference to the objective set out in the borough's LIP reflecting Mayoral targets to achieve a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041 and state that development proposals will be expected to contribute towards achieving the target. It would also be helpful to include a reference to Vision Zero, in the context of road safety.</p> <p>In 20.9 the definition of sustainable transport modes is too widely drawn because low and ultra-low emission vehicles and car sharing do not address issues of congestion, road danger, severance and making streets less attractive for walking, cycling and dwelling. The MTS makes clear that car-based modes (including taxis and private hire vehicles as well as those listed above) are not included in the mix of sustainable modes for the purposes of modal split targets and the text should be amended to reflect this.</p> <p>Map 21 –Cycling Routes is helpful in identifying gaps in the network. It would be useful to confirm that contributions from developments will be secured to extend and improve the network.</p>	Comment noted.	<p>Reference to Vision Zero has been included to the revised Local Plan.</p> <p>Additional information about the CIL projects which will improve the sustainable transport network have been added to the supporting text of LP51 Sustainable Transport (Now LP49).</p> <p>Paragraph 20.9 has been amended in response to this comment.</p>
Cllr Graeme Henderson and Cllr Rigby	Earlsfield Labour Party			929	Policy LP51	<p>Design for Active Travel</p> <p>From a public health perspective, we believe in enabling and encouraging active travel (as the most practical way to achieve Chief Medical Officer recommended levels of physical activity). The case for this is very well made in TfL's Health Action Plan and its more recent 'Healthy Streets for London' policy document - more info on this and the associated tools are at <a href="https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets">https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets</a></p> <p>Walking or cycling, is something we should be encouraging and is part of the Wandsworth Local Plan and both Wandsworth Council and Mayor of London policy such as Wandsworth Cycling Strategy, the Mayor of London's Transport</p>	Comment noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Strategy and Walking Action Plan. There should always be a presumption of "active travel" i.e. walking and cycling over underused car parking.</p> <p>Bollards rather than barriers should be used to reduce cycling speeds.</p> <p>In terms of Design and Access developers and planners should be aware that many people use cycles as a mobility aid, and more would do so if the physical environment enabled them to do so. We would strongly advocate as best practice in inclusive design; the excellent recent document 'Guide to Inclusive Cycling' produced by Wheels for Wellbeing, available at <a href="https://wheelsforwellbeing.org.uk/campaigning/guide/">https://wheelsforwellbeing.org.uk/campaigning/guide/</a></p> <p>Cycle sheds should be an integral part of any estate design.</p>		
Julie McPhillips				980	Policy LP51	<p>There is a mention of creating 'parklets'. I personally think we would benefit much more by planting more trees in the borough's streets. Trees should be native to, and grown in the UK, not imported trees that could be harmful and disease carrying. I feel parklets would have the potential to be taken over by drunks, junkies and gangs and end up as a dumping ground for rubbish. Put the money towards creating youth clubs instead.</p>	<p>Comments noted. LP58 Tree Management and Landscaping and LP59 Urban Greening Factor provide detailed information on how the Council will introduce new trees into the borough's streets.</p>	<p>No changes to the Local Plan are considered necessary.</p>
ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1004	Policy LP51	<p>Low Traffic Neighbourhoods There is no mention anywhere in the draft Plan of Low Traffic Neighbourhoods, even though they represent among the most significant evolutions of the Borough's transport policy in decades and continue to be trialled/implemented across the Borough. They offer significant potential for mitigating the impacts of traffic on residential streets, and in locations where it has already been decided that they should not be implemented, detail on replacement or substitute measures is needed to ensure the Plan's approach accords with London Plan Policy T2 Healthy Streets. Furthermore, given that a key objective of the LTNs is to boost active travel and to cut carbon emissions, they are again a prime example of policy highly relevant to the climate emergency declaration and the WESS, but mentioned in neither. It is clear from this and our other comments on strategic matters that there needs to be significant further thinking about joining up the Council's strategic land use priorities to demonstrate to the Plan Inspector that genuinely sustainable development is being achieved as required by national policy, as well as to respond to the London Plan's own ambitious low-carbon agenda as set out in its Policy GG6. For these reasons, LTNs, including appropriate signposts to evidence and data around their past and ongoing rollout, need to be referenced in relevant parts of the draft Plan, including transport, climate change, and place-specific policy (for locations where they have been trialled or continue to be implemented).</p>	<p>The Council has suspended Low Traffic Neighbourhoods however the implementation and management of Low Traffic Neighbourhoods is not within the remit of the Local Plan.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Riccardo Composto	Tooting Healthy Streets			1287	Policy LP51	<p>See attachment for representation</p> <p><b>Policy LP51</b></p> <p>We support this policy but suggest it includes specific reference to the sustainable transport hierarchy from the WESS (the diagram from page 12 of that document could be included in this section).</p>	<p>Chapter 15 Tackling Climate Change address the importance of the WESS as does paragraphs 2.35-2.40.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1346	Policy LP51	<p>- New developments should ensure walking and cycling are the most convenient means of access to/from the site. (LP51)</p>	<p>Comment noted.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Michael Atkins	Senior Planning Officer Port of London Authority			1474	Policy LP51	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>13. Sustainable Transport</p> <p>- Policy LP51: Sustainable Transport.</p> <p>In principle support policy LP51, which states that the Council will support proposals that reduce the need to travel and will work to promote safe, sustainable and accessible transport solutions for all users and part B4 which promotes safer, less polluting and more efficient freight movement.</p>	<p>Comment noted.</p>	<p>Supporting text has been amended in response to this comment.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						However as part of this it is considered that specific reference is given to the potential increased use of the river as part of the policy, both for passenger and freight transport.		
Robert East	Senior Planning Policy Officer LB Lambeth			1598	Policy LP51	LP51 Sustainable Transport  Lambeth would support greater emphasis on the need to improve physical accessibility of the transport networks, including streets, and inclusiveness generally.	The Wandsworth Local Implementation Plan 3 (2019) provides details as to how the borough will create greater accessibility and inclusivity within the transport network.	No changes to the Local Plan are considered necessary.
Mrs Sarah Rayfield				33	Policy LP52	<p><b>Newly constructed paths</b> The physical creation of new paths is to be welcomed (provided that equestrians are included, at least outside of town centres), as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting. The Society is happy to work with the Council to ensure that new paths are also integrated with public access areas within and outside the Borough(e.g. Metropolitan Commons such as Wimbledon and Putney Commons) and public rights of way network to achieve maximum benefit for ALL users.</p> <p><b>Use of existing public rights of way</b> Our concern is that any development should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. Where existing routes are impacted as part of the plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed, and, if necessary, alternative measures discussed.</p> <p>•Any newly constructed paths should be integrated / physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate.</p> <p>•Where proposed new or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided.</p> <p>•Consideration should be given to the use of 'Quiet Lanes' where the speed of traffic is reduced.</p>	Comment noted. For information on the creation of new paths please consult on the next Local Implementation Plan.	No changes to the Local Plan are considered necessary.
Mrs Sarah Rayfield				34	Policy LP52	<p>Commuting cycling is likely to take place at times other than when recreational use takes place. Thus a path used for commuting may well be used for recreational travel especially if it provides a circular route by connecting to other paths.</p> <p>Several categories of public right of way (bridleways, restricted byways and byways and minor public roads) are already shared by cyclists and other user groups. Thus, as a general principle, we believe that, for maximum public benefit &amp; fairness, the reciprocal should be implemented, i.e. that new cycle paths should be shared with other user groups unless there is a specific unresolvable reason not to do so.</p> <p>Finally, whilst Wandsworth is a London Borough where space is at a premium and, as with all Councils, budgetary constraints apply, we know that there are many horse riders both within and immediately outside the Borough and urge you to include them wherever it is possible to do so.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			345	Policy LP52	<p>LP52.A.1 &amp; 2 Let's be clear. This policy forbids the councils ambitions to redevelop the Alton Estate as at present transport in Roehampton does not meet these criteria.</p> <p>LP52.D This needs to encourage, not restrict.</p> <p>LP52.E. Almost all crossovers are potential hazards to pedestrian safety. Is this what this means?</p>	Comment noted.	LP52 Transport and Development (Now LP50) has been amended to reflect this comment.
Monica Tross	Secretary to planning committee			832	Policy LP52	<b>LP52 Transport and Development</b>	Comments noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society					<p>There is an underlying flaw in the basis of this policy in that it assumes that existing public transport and road capacity is adequate and working well. Certainly in the Battersea /Nine Elms area merely walking round during the evening peak hours will show this is clearly not the case. Experience suggests the overloading of public transport provision is similar elsewhere, for example in Wandsworth Town Centre and Putney.</p> <p>A.1 on good public transport access levels is in practice useless as a high PTAL does not mean that there is capacity. The effect of other planned and approved developments should be considered, not just many individual developments, all with the same PTAL and using the same transport infrastructure. Cumulative assessments should be made.</p> <p>A2 and 4: The Council and TfL need to demonstrate that the infrastructure is capable of supporting improvements within a realistic time-frame.</p>		
Josephine Vos	Transport for London			739	Policy LP52	<p>TfL welcomes the requirement for major trip generating development to be located where there is sufficient public transport access and capacity. The policy should also refer to the importance of connectivity by active travel modes.</p> <p>Although it is referred to elsewhere, the policy wording could be more explicit about the need for mitigation in the form of planning obligations or CIL contributions to remedy any deficiencies in access, capacity or connectivity.</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Michael Atkins	Senior Planning Officer Port of London Authority			1475	Policy LP52	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP52: Transport and Development,</p> <p>In principle support part D of the policy which states:</p> <p>"The River Thames is considered a major transport route for freight and construction and will be protected for these uses, any development that impacts these uses will need to be supported by Transport Assessments (TAs) to demonstrate how the impacts will be mitigated."</p> <p>To further strengthen this policy it is considered that there is support in this policy for development proposals in close proximity to navigable waterways in Wandsworth, must in supporting Transport Assessments include consideration of the maximisation of the use of the river for freight, including for the transportation of construction materials to, and waste from a development site either directly to/from the site or through the supply chain. This would strongly align with the opportunities and challenges of the Local Plan to reduce carbon emissions and improve air quality and is supported by the PLAs Thames Vision.</p>	Comment noted.	LP52 Transport and Development (Now LP50) has been updated in response to this comment.
	Wandsworth Cycling (London Cycling Campaign)			234	Policy LP53	<p>A. Additional requirement needed to encourage secure parking for existing developments and facilities for staff changing/showering in businesses or other establishments.</p>	LP40 Requirements for New Economic Development (A)(5) supports proposals for economic uses to provide adequate facilities that promote cycle usage, including workplace showers, changing rooms, and lockers.	No changes to the Local Plan are considered necessary.
Lois Davis	Co-ordinator Wandsworth Green Party			468	Policy LP53	<p>LP53 Parking, Servicing and Car Free Development</p> <p>We support criteria for new developments to include minimum levels of parking for cycles (A) and maximum levels of off-street parking for vehicles (B).</p> <p>We suggest that the same principle of minimum levels of cycle parking and maximum levels of car parking should apply to on-street parking for both new developments and in existing residential neighbourhoods. Currently, the reverse is true, with unlimited vehicle parking permits per household and tightly restricted availability of on-street cycle parking. The Council attributes its own success in reducing vehicle ownership in large part to planning policies favouring no-car and low-car development (LIP3 2.4.32). We call on the Council to apply this winning formula in residential neighbourhoods more widely.</p>	The administration of Controlled Parking Zones is outside the remit of the Local Plan.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Dr Samuel Clifford				583	Policy LP53	These are very good guidelines.	Comment noted.	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee Battersea Society			833	Policy LP53	<p><b>LP53 Parking, Servicing, and Car Free Development</b></p> <p>1. With the increasing number of deliveries it is essential that off-street space for set-down and pick-up be provided and that requirement E be fully complied with.</p> <p>We consider the omission of car-parking within a development can be counter-productive with the lack of off-road space for residents to 'stable' their cars for use on out-of-town trips a disadvantage.</p> <p>F and H 'Minimum' number of disabled car parking spaces should be realistic and off-road. We see large developments with disabled parking some way from the building and office development suggesting that one or two disabled parking bays be provided. What is considered best practice for the ratio of disabled parking spaces in relation to the number of office jobs proposed?</p> <p>2. On-street Parking: 2. The need for <i>any</i> on-street parking in relation to larger developments on main and/or heavily trafficked roads is unacceptable and 3, what does this mean?</p> <p>1. and L These policies on car-free and low-car developments are repetitive. See comments above regarding capacity, number of disabled parking spaces.</p> <p>1. The restriction against parking permits takes no account that in the evening and at weekends residents and their visitors should have priority for parking space and not have to compete with residents of notionally car free developments. We have been disappointed at instances where the Council has allowed the condition that residents not be eligible for parking permits to be waived after planning approval has been given. The Council should consider extending the hours of parking control where this is to the advantage of residents.</p> <p>N The Council should ensure that residents of affordable housing units are not priced out of parking spaces within a development.</p>	<p>The Council is committed to reducing the usage of cars in the borough by reducing the overall number of car parking spaces not just on street parking. Policy T6.5(B) of the London Plan states that disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with. Table 10.6 provides a detailed guidance as to how many non-residential disabled persons parking bays are required. Developments in Wandsworth are required to comply with the London Plan as well as the Local Plan.</p> <p>Part I (2) relates to all developments and allows for flexibility with regards to on street parking in parts of the borough that are not as well served by public transport. Part K does require car free developments in areas of the borough with high PTAL. I (3) relates to cycle parking, cycle hire stations or parklets among other sustainable transport alternative uses.</p> <p>The administration of Controlled Parking Zones is outside the remit of the Local Plan.</p> <p>The wording of Part N of Policy LP53 (now LP51) is considered appropriate.</p>	No changes to the Local Plan are considered necessary.
Josephine Vos	Transport for London			740	Policy LP53	<p>TfL welcomes the requirement to comply with London Plan standards for both cycle parking and car parking. We welcome the importance attached to the quality as well as the quantity of cycle parking in 20.29. This could usefully reference guidance on cycle parking in the London Cycling Design Standards.</p> <p>However, it is not appropriate as suggested here to substitute cycle hire provision for adequate cycle parking. The two serve different markets because cycle hire is designed for short trips when a personal cycle is not available e.g. for visitors, one leg of a complex multi modal trip or for leisure cycling, and does not provide the flexibility or certainty for the regular user that guaranteed access to cycle parking at the home, workplace or shopping destination does provide. Any requirement for contributions towards cycle hire provision should be additional to meeting minimum cycle parking standards and not in lieu of it.</p> <p>The wording of part B should make clear that by referencing Table 10.3 of the London Plan, it is only covering residential car parking. Part C should clarify that maximum retail parking standards in Table 10.5 of the London Plan would be applied and the text in 20.25 should remove mention of retail and leisure car parking being considered favourably where PTAL is high because all retail developments in PTAL 5 and 6 should be car free. Similarly, the text later in the same paragraph that states developments should provide 'adequate' car parking must be removed.</p>	<p>Paragraph 20.31 does not make reference to additional car trips to retail destinations to use the rapid charging facilities. Due to the current lack of charging infrastructure in the rest of the borough people may need to make additional trips in order to charge their cars.</p> <p>Changing residential conversion to all type of development would have a detrimental effect on neighbours who rely on on-street car parking and the development would be adding to parking pressure even if it didn't generate any trips. Office car parking will be in line with LP53 (H) which recommends standards for car parking in line with the London Plan.</p> <p>Extending CPZs or other parking controls to address potential concerns on street parking would be within the remit of the Local Implementation Plan and not the Local Plan.</p>	<p>LP53 Parking, Servicing and Car Free Development (Now LP51) has been updated in response to this comment.</p> <p>Supporting paragraphs have been amended in response to this comment.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>It should be noted that car clubs may play a role in reducing car dependency, but only if they are paired with measures to reduce private car ownership, rather than effectively widening access to car use. The London Plan counts car clubs towards the maximum parking standards for this reason and Policy T6.1 D makes it clear that they are not appropriate in the Central Activities Zone.</p> <p>TfL welcomes the requirement for electric vehicle charging points to be provided in line with London Plan requirements. In 20.31 caution should be exercised when encouraging rapid charging facilities at destinations such as retail developments because this risks encouraging additional car trips solely to visit the rapid charging points rather than using a charging facility at home.</p> <p>In Parts I and J TfL welcomes the encouragement given to conversion of car parking to other uses, but in part I it should be extended from just residential conversions to all forms of development. In Part J it should be noted that there are underlying trends towards a reduction in retail trips, particularly by car and so looking into the future, the requirement for car parking is likely to decrease over time.</p> <p>In part K car free residential development should be required for PTAL 4 and above while all office development should be car free. The wording of 20.32 needs to be updated to reflect this car free requirement for all office developments. The additional requirement for public transport interchanges to be close by is superfluous and should be deleted. A single station, interchange or stop serving a range of destinations may result in a high PTAL and would provide an appropriate location for car free development. Similarly, it should not be a requirement for a Transport Assessment to have to demonstrate the case for car free development where this is compliant with the London Plan parking standards.</p> <p>In Part L TfL welcomes encouragement of low car development although this should apply only to residential development in PTAL 3 and appropriate locations in a lower PTAL (e.g. where connectivity is good, active travel opportunities are available or where public transport improvements are planned). As noted above car free (rather than just low car) development is required in PTAL 4.</p> <p>TfL welcomes the continued commitment to no additional parking permits being issued to occupiers of new housing. For existing occupiers being rehoused as part of estate redevelopments, parking permits should be limited to residents who already have parking permits or who own and park a car on the estate.</p> <p>We would like to see an additional commitment to extend CPZs or other parking controls where these are considered necessary to address potential concerns about on street parking pressures. Funding from development can be used to carry out surveys and implementation. The absence of a CPZ should not be used as a justification for providing additional car parking. This should be referenced in the text in 20.26 and in 20.33.</p> <p>In 20.27 we welcome the requirement for Delivery and Servicing Plans and Construction Logistics Plans. These should be updated to reference London Plan Policy T7 rather than the London Freight Plan. The Local Plan should also provide general encouragement to the development of facilities to promote the sustainable movement or transfer of freight and to ensure opportunities are taken to minimise freight impacts of development on the transport network.</p>		
Kin Development		Ben Ford	Director Quod	1053	Policy LP53	<p>Background and Wandle Delta SPD comments are included in the attachment in comment 1025</p> <p><u>Underlined is text which should be removed. In bold is new suggested text</u></p> <p><b>Chapter 20 Sustainable Transport</b></p> <p><b>LP53 Parking, Servicing, and Car Free Development - OBJECT</b></p>	Comment noted. The Local Plan will continue to follow the guidance of the London Plan.	LP53 Parking, Servicing and Car Free Development (Now LP51) has been updated to be in line with the London Plan.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Policy LP53(K) confirms the Council's approach to car free development in locations with a PTAL</p> <p>score of 5 or higher. Whilst Kin are supportive of sustainable transport initiatives and the Council's</p> <p>ambition for car free development in high PTAL locations, Kin also recognises that there can be a</p> <p>practical requirement to deliver on-site car parking for family housing (two bed / four person and three+ bed homes) and for specialist Retirement Housing in such locations.</p>		
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1348	Policy LP53	We would like to see EV charging points in new development exceed the London plan. We would like clarification on: - What are the plans for EV charting points in existing centres/streets.	The Corporate Business Plan and the Local Implementation Plan provides detail on the Council's plans for EV charging points in existing centres/ streets.	No changes to the Local Plan are considered necessary.
Cyril Richert	Clapham Junction Action Group			1681	Policy LP53	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>LP53 Parking, Servicing, and Car Free Development page 357</p> <p>Car-free schemes are too often used by developers to avoid expensive developments and thus maximise profit to the expense of the existing area.</p> <p>Less car-parking always mean more congested adjoining streets especially at night time and weekend when visitors come or rented cars need to park. In the past, the Council has waived the condition that no parking permits for residents will be provided, after planning approval was granted.</p> <p>In the Clapham Junction area, it has been demonstrated also that, despite a magnificent PTAL, the congestion is a major issue and transports are over-stretched at some specific hours.</p> <p>CJAG comment above is supported by The Wandsworth Society and The Battersea Society's responses to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018</p> <p>We dispute the requirement for car-free and car-low developments.</p> <p>We suggest the following:</p> <p>K. Car-free development will be required considered where:</p> <p>L. Low Car development will be required considered where:</p>	Comment noted.	LP53 Parking, Servicing and Car Free Development (Now LP51) has been updated to be in line with the London Plan.
Robert East	Senior Planning Policy Officer LB Lambeth			1599	Policy LP53	<p>LP53 Parking, Servicing, and Car Free Development</p> <p>K and L</p> <p>Car Free and Low Car development should be defined to avoid confusion, particularly in relation to the London Plan parking standards from which they can appear to depart.</p> <p>More explicit policy on reducing and managing servicing trips would be welcome, including reference to consolidation and green freight.</p>	Comments noted. LP51 Sustainable Transport B has considered these issues.	LP53 Parking, Servicing and Car Free Development (Now LP51) has been updated to be in line with the London Plan.
Legal and General Property Partners	Legal & General Property Partners	Neil Wells	Quod	1554	Policy LP53	<b>See attachment in representation 1534 for context</b>	London Plan Policy H13 Specialist older persons housing (B) (5) explains that specialist older persons housing should deliver pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and	No changes to the Local Plan are considered necessary.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	(Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited					<p>Chapter 20 Sustainable Transport</p> <p>LP53 Parking, Servicing, and Car Free Development - OBJECT</p> <p>Policy LP53(K) confirms the Council's approach to car free development in locations with a PTAL score of 5 or higher. Whilst L&amp;G are supportive of sustainable transport initiatives and the Council's ambition for car free development in high PTAL locations, L&amp;G also recognises that there can be a practical requirement to deliver on-site car parking for family housing (two bed / four person and three+ bed homes) in such locations.</p> <p>Paragraph 20.26 states that development should seek to provide the minimum realistic amount of car parking for the site, without undue risk of overspill parking onto surround streets.</p> <p>We consider that Policy 53(K) and supporting paragraph 20.26 should include support for on-site parking for family housing, which would itself negate the risk of overspill parking that could be created by these users who require access to a vehicle.</p> <p>On behalf of L&amp;G, Quod reserves the right to add to or amend these representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level.</p> <p>Yours sincerely</p> <p>Neil Wells</p> <p>Senior Planner</p>	ambulances. The London Plan defines family-sized units as 3 bed + units and they will be car free if built in areas with a high PTAL.	
	Wandsworth Cycling (London Cycling Campaign)			235	Policy LP54	B. 3. Needs to be a requirement to accommodate cycling safely along with walking safely	Due to a variety of reason including topography and biodiversity, the riverside walks may require cyclists to dismount at sections to ensure complete safety for all users. The policy therefore includes the flexibility that cycling will be accommodated where possible.	No changes to the Local Plan are considered necessary.
Dr Asif Din				250	Policy LP54	Consideration for the existing residents on Nine Elms Pier is required for the proposed bridge so at this stage its proposed location is objectionable.	Comment noted. LP54 Public Transport and Infrastructure (A)(1)(a) requires consultation to have been undertaken with operators, owners, and stakeholders	No changes to the Local Plan are considered necessary.
Mr Christopher Buck				482	Policy LP54	<p>A footcycle bridge will not ease road congestions near Vauxhall. Road traffic levels (Cars etc) will remain at the same level.</p> <p>Cyclists riding across a foot bridge are liable at some point to run some one over.</p> <p>The proposed landing site in Pimilico Gardens contains listed trees. Building works would inevitable lead to environmental damage and pollution.</p> <p>For the millions this bridge will cut cycling journeys by..one minute? I object to the bridge.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee Battersea Society			834	Policy LP54	<p><b>LP54 Public Transport and Infrastructure</b></p> <p>1. 3 the requirement that riverside walks should, where possible, allow for provision of cycling, ensuring pedestrian safety needs modification. Where cycling takes place it should be within managed space rather than a free-for-all of shared space.</p> <p>2 the requirement that minicab offices will be allowed only where "at any time" parking restrictions are in place will be effective only if it is properly enforced. There needs to be practical action planned to avoid the</p>	<p>The guidance for riverside walks are covered in LP54 Public Transport and Infrastructure and LP61 Riverside Uses, Including River-dependent, River-related and River Adjacent Uses. They both capture important requirements for the riverside walks as they have transport and open space functions. It is considered appropriate to keep them in separate policies,</p> <p>Due to a variety of reason including topography and biodiversity, the riverside walks may require cyclists to dismount at sections to ensure complete safety for all users. The policy therefore includes the flexibility that will ensure the safety of all users.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						environmental harm and street congestion caused by Uber and other drivers lurking (often with engines running) to be called for a pick up.	Enforcement of idling drivers is not within the remit of the Local Plan.	
Josephine Vos	Transport for London			741	Policy LP54	<p>TfL welcomes the Council's support for, and commitment to, the major transport infrastructure projects listed in part A, including the Northern line extension to Battersea and Crossrail 2. The Local Plan should take account of the following project update for Crossrail 2:</p> <p><i>'The funding agreement with the Government of 31 October 2020 includes a commitment by TfL in relation to Crossrail 2 that TfL "prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project as required."</i></p> <p><i>We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme's latest proposed route from future developments. We are in discussion with DfT on the likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed.</i></p> <p><i>Given TfL's current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London's growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.'</i></p> <p>Crossrail 2 Safeguarding appears on various plans in the document and looks to reflect the 2015 Safeguarding Directions, including the route alignment and Areas of Surface Interest (AOSI) as set out in the plans accompanying the Direction. Where Crossrail 2 Safeguarding is mentioned it should be made clear that it is the Crossrail 2 2015 Directions and plans that are being referred to/</p> <p>Paragraph 20.6 provides in principle support for a further extension of the Northern line beyond Battersea to Clapham Junction. There are no current plans for an extension beyond the planned terminus at Battersea Power Station and it does not feature in the list of strategic transport schemes in Table 10.1 of the London Plan. As such it would be unlikely to go ahead within the Local Plan timeframe.</p> <p>The section on safeguarding and retention of transport land in part A 1 is welcomed, but the wording should more closely follow London Plan Policy T3. For clarity, it would be helpful to refer to TfL as well as other stakeholders. This includes bus garages and rail depots where TfL may not be the owner nor the operator.</p> <p>TfL also welcomes the intention to safeguard land for future transport functions. This should include both statutory safeguarding and transport projects or areas for expansion where there is a likelihood that land may be required within the Local Plan period. Land for freight uses, including: transfer, interchange, consolidation and last mile deliveries may also need to be identified. Although financial contributions may be appropriate and justified, they should not be an alternative to the provision of land where this has been identified as necessary to implement a project.</p> <p>TfL welcomes the reference to the Healthy Streets Approach in part B but the bullet points 1 –4 all seem to relate to provision of riverside walks mentioned under part A 3.</p>	<p>Comments noted. The language is considered sufficient and with regards to the provision of land for transport functions it is restrictive enough and only applies to special circumstances.</p> <p>The guidance for riverside walks are covered in LP54 Public Transport and Infrastructure and LP61 Riverside Uses, Including River-dependent, River-related and River Adjacent Uses. They both capture important requirements for the riverside walks as they have transport and open space functions. It is considered appropriate to keep them in separate policies,</p>	LP54 (Now LP52) has been amended in response to this comment.
Michael Atkins	Senior Planning Officer Port of London Authority			1476	Policy LP54	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP54: Public Transport and Infrastructure.</p> <p>Support part A3 of the policy which states that the Thames and Wandle riversides will be protected as they are key routes for walking and cycling in</p>	Comments noted.	Supporting text has been amended to include reference to safeguarded wharves.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Wandsworth and are also important natural resources, Parts B1 – B4 are also supported with regard to the riverside paths and accesses linking to riverside areas is also supported.</p> <p>Supporting paragraph 20.38 includes further detail with regard to the Thames Path, and states that in exceptional circumstances, where there are safety or operational considerations alternative safe and attractive routes around or through sites may be acceptable, providing they link with and do not prejudice the long term implementation of the continuous Thames Path. Whilst this reference is supported, it is considered that this should be specifically referred to in the context of the boroughs safeguarded wharves. Related to this It is noted the Battersea Heliport is given as an example where such an exceptional circumstance would be acceptable, but then the following paragraph 20.39 covers heliports specifically whereas wharves are not mentioned at all. This should be amended in the supporting text.</p>		
Robert East	Senior Planning Policy Officer LB Lambeth			1602	Policy LP54	<p>LP54 Public Transport and Infrastructure</p> <p>Support for improvements to suburban rail services ('metroisation') would be welcomed.</p> <p>References to major highway improvement schemes would be welcomed e.g. Vauxhall Gyrotory (also at Section 5 Nine Elms).</p>	Comments noted.	Policy has been amended to include reference to suburban rail services and highway improvement schemes.

## Chapter 21 - Green and Blue Infrastructure and the Natural Environment

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Caroline Hartnell				202	General Green and Blue Infrastructure and the Natural Environment Comments	<p>The last year has demonstrated just how important nature/green spaces are for people's health and wellbeing. The Council should adopt two general policies:</p> <ul style="list-style-type: none"> <li>- to preserve what we have, which means no cutting down of mature trees (unless for safety reasons) or loss of green spaces</li> <li>- to take all opportunities to plant more trees and create more green spaces, including rewilding of some areas</li> </ul> <p>These measures are essential to reduce carbon emissions and to increase residents' health and wellbeing and overall quality of life.</p>	LP55 Protection and Enhancement of Green and Blue Infrastructure sets out Wandsworth's position to protect and enhance open spaces in the borough. Any tree removals will be done in accordance with LP58 Tree Management and Landscaping and LP59 Urban Greening Factor provides more detail as to how new developments will provide new green features including additional trees to the borough.	No changes to the Local Plan are considered necessary.
Mr David Patterson	Agent Tooting Liberal Democrats			700	General Green and Blue Infrastructure and the Natural Environment Comments	The text talks about Wandsworth aiming to be the "greenest borough in inner-London". This is a strange aim as we do not know how green other inner-London boroughs will become. It could be a very low bar considering how much green space Wandsworth has to start with. A better aim would be to reach certain objectives.	The objective to become London's Greenest Inner London Borough is part of a series of actions outlined in the WESS that will help Wandsworth become a greener borough and benefit from all the benefits that come with that. These actions include: Build upon our successful tree planting programme by planting at least 400 new trees per year and looking at ways to increase this year on year; Increase green infrastructure assets for the city by creation or management of a green infrastructure asset register and maintenance plan; Develop core biodiversity areas.	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee Battersea Society			749	General Green and Blue Infrastructure and the Natural Environment Comments	Chapter 21, Green and Blue Infrastructure and the Natural Environment  A submission on this chapter will be made separately by the Open Spaces Committee of the Battersea Society.	Comments noted.	No changes to the Local Plan are considered necessary.
Monica Tross	Sectary to planning committee Battersea Society			835	General Green and Blue Infrastructure and the Natural Environment Comments	<b>21: GREEN AND BLUE INFRASTRUCTURE AND THE NATURAL ENVIRONMENT</b>  Being submitted separately by the Open Spaces Committee of the Battersea Society	Comments noted.	No changes to the Local Plan are considered necessary.
Jesse Honey				864	General Green and Blue Infrastructure and the Natural Environment Comments	<p>Approach to green infrastructure</p> <p>The emerging plans chapter and policy on green and blue infrastructure is generic and insufficiently place-specific.</p>	Chapter 21 Green and Blue Infrastructure and the Natural Environment is to be read in conjunction with the Area Spatial Strategies which provided detailed guidance for how each area is expected to develop in terms of open space and the natural environment..	No changes to the Local Plan are considered necessary.
Jesse Honey				867	General Green and Blue Infrastructure and the Natural Environment Comments	We note and welcome the preparation of a new Biodiversity Strategy for the Borough (published after the Local Plan consultation started) but again, there is no reference within the biodiversity strategy to any existing or emerging Green Infrastructure strategy when, clearly, the two should be closely related given the biodiversity importance of the Boroughs multifunctional green infrastructure and the opportunity offered by the WESS for more holistic thinking on the environment. Our views on the key locations and issues a more place-specific and joined-up approach to green infrastructure might consider for Tooting are set out in detail in our neighbourhood specific comments below.	Wandsworth Council has chosen to follow the guidance for the new Urban Greening Factor as set out in the new London Plan closely and will in future be required to prepare its own Urban Greening Factor which can identify different thresholds and requirements for different parts of the borough.	No changes to the Local Plan are considered necessary.
Steve Kersley	Spencer Cricket			634	General Green and Blue Infrastructure and the Natural Environment Comments	<p>8. We are pleased to see that they Draft Local Plan (WLP) is strong on policies resisting loss of open space. However whilst it expresses support for ideas, it could be more proactive about increasing the quantity and quality of sports facilities. See in particular:</p> <p>a. There should be a wider search for sites for sports facilities, including by way of examples in a rationalisation of space within housing estates, within</p>	<p>The Wandsworth Playing Pitch Strategy has conducted an extensive search for potential locations for new sports facilities.</p> <p>The Wandsworth Playing Pitch Strategy will take into account the suggested options as part of the scenario testing for new sites. Please review the Wandsworth PPS for more information.</p> <p>The Council is preparing a Walking and Cycling Strategy for the borough which</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>mixed use development, in railway arches (p321) and on roofs of new buildings. There might well be opportunities in town centres, notably Clapham Junction (p119) where there is excellent access.</p> <p>b. Greater mention should be made of sport in relation to community uses and health and wellbeing (P30).</p> <p>c. Looking specifically at policies for new facilities, the policy refers to enhancing facilities in accessible locations (p371). This is sound for indoor sports facilities (and should not be limited to sports that are always played indoors), but most outdoor sport is played in areas of the borough that are less accessible and the Council should work with sports providers to improve facilities for pedestrians and cyclists.</p> <p>d. The same policy also states that proposals for new or enhanced facilities should "maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities". Making more use of existing facilities and encouraging co-location is an excellent idea and given population increases, the known deficiency in sports facilities, the WLP should be more pro-active in asserting ways that existing facility use can be increased and ensuring that the feasibility of this is addressed as a wider part of planning and development policy.</p>	will outline how the active travel network for the borough will be improved and connect more people to open spaces for sport and recreation. It is not within the remit of the Local Plan to provide direction for how existing sports facilities should be managed.	
Mr Marc Newey	Chief Executive Roehampton Club Ltd	Sarah Temple		1070	General Green and Blue Infrastructure and the Natural Environment Comments	See attachments for form and representation	<p>The Council are not reviewing land designated as MOL or their boundaries as we are able to accommodate our development needs without encroaching onto protected open land.</p> <p>If the Roehampton Club wants to propose development or extensions within designated MOL, this should be assessed as part of a planning application; any such application would be assessed against MOL policies, including the NPPF policy on Green Belt, which allows for some exceptions to be made; if the proposals would not qualify for an exception to policy, an applicant would have to demonstrate that 'very special circumstances' exist that may justify this development in MOL. The Council would give substantial weight to any harm to MOL and 'very special circumstances' would not exist unless the potential harm is clearly outweighed by other considerations."</p>	No changes to the Local Plan are considered necessary.
Diana McCann	Boroughs Coordinator The Blue Green Economy			1435	General Green and Blue Infrastructure and the Natural Environment Comments	<p><b>21 Green &amp; Blue Infrastructure &amp; the Natural Environment Introduction</b></p> <p>The fully comprehensive approach to water and urban heat island management, maximising the benefit to green spaces and mitigating exposure to drought and surface water flooding in urban settings is Integrated Water Resource Management (IWRM) with blue green technologies (BGT).</p> <p>It is recognised as global best practice with many applications. For example, rainwater harvesting (RWH) designs for either immediate reuse or storage for use at a later time. There's a wide range of applications including domestic gardens and water supply, or for civic use in large public green spaces, parks, roofs and gardens, but also in smaller street spaces. The 'blue' element of blue greening can include water storage / attenuation elements in support of 'green' natural planted infrastructure. Natural watercourses are part of the blue infrastructure complemented by the other applications.</p> <p>In rural settings, blue-greening is the 'rewilding' of cultivated, controlled land and river systems back to their former, more attenuating natural states. This again protects and retains valuable water by mitigating flood and drought, as well as allowing native flora and fauna to flourish.</p> <p>There are examples of best practice from around the world, with one of the most well-known the US city of Philadelphia which is half-way into an extensive 15- year program to become a Blue-Green city.</p> <p>Currently no UK city or local authority is employing the full tool-kit of blue green technologies. SuDs (Sustainable Urban Drainage Systems), is an example of one blue green technique. However, in contrast, full blue-greening requires a total but gradual networked application across all civic</p>	<p>Paragraph 21.10 outlines of the benefits that green and blue infrastructure can produce.</p> <p>Paragraphs 21.29 and 21.36 identify the benefits of green and blue infrastructure to help combat the urban heat island effect while LP10 Responding to the Climate Crisis addresses the need for new buildings to help combat the urban heat island effect.</p> <p>Wandsworth Council has chosen to follow the guidance for the new Urban Greening Factor as set out in the new London Plan closely and will in future be required to prepare its own Urban Greening Factor which can identify different thresholds, guidance and requirements for different parts of the borough.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>and residential buildings, roads, pavements and green spaces. Although requiring a long-term vision and commitment to install the required blue-green infrastructure, environmental and financial benefits begin to accrue from the early stages, beginning with considerable job creation on all levels, revenue savings from reduced requirement for flood defences and emergency water supply in drought periods, reduced Urban Heat Island (UHI) effect in summer reducing overheating risks. This is an especially important consideration for vulnerable groups, such as the elderly and disabled, and other benefits include better mental health and reduced crime.</p> <p>Council should consider greater clarification between wide benefits gained from blue green infrastructure in open spaces (infrequent usage by an individual) and those integrated into our living and working places (frequent usage).</p> <p><b>General Note</b></p> <p>All Policy references in Place Making sections should include IWRM with BGT in clauses referencing Blue and Green Infrastructure.</p>		
Isabella Jack	Sustainable Development Advisor Natural England			1610	General Green and Blue Infrastructure and the Natural Environment Comments	<p><b>See attachment on comment 1608 for context and appendices</b></p> <p>1. Richmond Park SAC and Wimbledon Common SAC</p> <p>The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites<sup>1</sup>. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites<sup>2</sup> should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.</p> <p>The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. As both Richmond Park SAC and Wimbledon Common SAC fall either partly within, or adjacent to the borough, it may be necessary for strategic and cross-boundary approaches to ensure that there is no adverse effect on the integrity of internationally designated sites. Natural England has reviewed a draft HRA screening for the Wandsworth Local Plan, and was largely in agreement with the conclusions that were drawn.</p>	Comments noted. LP57 Biodiversity provides clear guidance that protects important species and habitats. The supporting text outlines all the necessary designations that should be considered as part of any proposal.	No changes to the Local Plan are considered necessary.
Isabella Jack	Sustainable Development Advisor Natural England			1612	General Green and Blue Infrastructure and the Natural Environment Comments	<p><b>See attachment on comment 1608 for context and appendices</b></p> <p>1. Green and Blue Infrastructure</p> <p>We welcome the inclusion of green and blue infrastructure in Section 21, which refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health &amp; well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands. We are pleased to see Wandsworth Council's commitment to protecting the existing green and blue infrastructure, as well as enhancements in the future in line with the Urban Greening Factor to improve green connectivity throughout the borough.</p> <p>A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area,</p>	Wandsworth Council has chosen to follow the guidance for the new Urban Greening Factor as set out in the new London Plan closely and will in future be required to prepare its own Urban Greening Factor which can identify different thresholds, guidance and requirements for different parts of the borough.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						supported by appropriate detailed policies and proposals to ensure effective provision and delivery.  Natural England welcomes the inclusion of the Urban Greening Factor, as outlined in the emerging London plan, and that all development proposals will be required to follow this.		
	Wandsworth Cycling (London Cycling Campaign)			236	21.5	Subsequent policies are mainly concerned with avoiding loss of open space etc, with less about quality and accessibility. A commitment is required to develop a cycle network linking open spaces and another to provide more cycle parking in or close to open spaces or specific facilities in them e.g. children's playgrounds?	Wandsworth Council is preparing a walking and cycling strategy which will aim to create a more comprehensive network for active travel that connects to open spaces. See LP53 Parking, Servicing, and Car Free Development for more information on cycle parking in Wandsworth.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee Battersea Society			492	21.5	Para 21.5."The existing green and blue infrastructure will be managed to ensure it is reaching its potential in terms of quality and accessibility." This is an extremely welcome comment, but in order to achieve this objective, specific actions and targets are required.	The WESS provides targets and actions for Wandsworth Council to help them become the greenest inner London Borough.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			346	21.7	The requirement for major new developments to provide green features does not include enough measures for improving habitats by seeking inclusion of such features as swift bricks and boxes as well as bat boxes (and possibly insect hotels).	LP59 Urban Greening Factor will require new developments to providing greening features which will have benefits to biodiversity. When Wandsworth prepares its own Urban Greening Factor consideration will be given to the impact a greening feature has on biodiversity and will create thresholds and guidance accordingly.  LP57 Biodiversity sets out the Council's position on Biodiversity Net Gain.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee Battersea Society			490	General Open Space Study Comment	<p>Remit of this document</p> <p>These comments focus specifically on the draft Local Plan as it affects Wandsworth's open spaces. It should be read in conjunction with the separate and more comprehensive submission made by the Battersea Society's Planning Committee within Wandsworth Council's public consultation procedure.</p> <p>The draft Local Plan is accompanied by a number of supporting documents which form its evidence base, including a draft Open Space Study. We note that there is no requirement to consult publicly at this stage on these documents, albeit the consultants who compiled them should have made contact with interested parties in their production.</p> <p>We feel that it is reasonable to make reference to this evidence base when commenting on the draft Plan, and to draw connections between the evidence as presented and the draft policy. We have therefore chosen to begin by commenting on the draft Open Space Study, suggesting some areas where that would benefit from correction or expansion.</p> <p>The draft Local Plan also makes reference to a separate Open Space Strategy. This has not yet been made available, however. We would like to see it, and trust that it will ultimately form part of the Local Plan.</p> <p>Within the draft Local Plan itself, we have commented on the chapter on Green and Blue Infrastructure. Like our colleagues on the Planning Committee we believe that as a draft policy this document needs clarifying and strengthening; we have attempted to suggest some specific measures and targets which could help Wandsworth achieve positive change and delivery in relation to open spaces.</p> <p>We have welcomed this opportunity, and hope that our suggestions for improvement will be taken in the constructive spirit in which they are intended. We will be happy to discuss any of them further, should that be helpful, and will in any case look forward to reviewing the next stages of the Study, Strategy and Plan's development.</p> <p>Open Space Study</p>	Open Space Study comments have been noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>General points:</p> <ul style="list-style-type: none"> <li>• The maps are not sufficiently legible. Clearer maps are required to ensure clarity and the delivery of policies.</li> <li>• Some spaces smaller than 0.2 hectares have been excluded. Whatever the requirements of an evidence base, in terms of placemaking a finer level of detail will be required. For example, Christchurch Gardens should not have been omitted. It includes a unique listed war memorial, has its own Friends' group and is moreover a link within a "green chain" of small parks (Latchmere Recreation Ground—Falcon and Shillington Parks—Christchurch Gardens—Fred Wells Gardens—Vicarage Gardens and the Thames Path). Their linking is undermined by its exclusion. We would wish to see all open spaces, however small, recorded in the Study. All have potential to deliver neighbourhood amenity and character; even forgotten and unloved spaces can become valuable local assets when nurtured and cared for.</li> <li>• We are not convinced that grouping spaces by Wards is useful, as connections and linkages cross ward boundaries. Analysis in distance/travel time, as on p80, is potentially more helpful.</li> <li>• Analysis should also include the examination of physical and perceived barriers to pedestrian and cycle movement e.g. safety, quality of environment, inclines.</li> <li>• In making assessments of quality, we remain unclear what methodology has been used. Air quality would be an example of a useful measure.</li> </ul> <p>P26. Fred Wells Gardens and Falcon Park have failed quality scores; the reasoning is covered on p32. The improvements to Fred Wells Gardens are now complete, so its score should be reassessed. Our own comments are quoted on Falcon Park; the problems we mention remain unaddressed.</p> <p>Map, p.38. Why is the Thames Path classed in its entirety as a natural or semi-natural green space? Why is only a small section of Wandsworth Common classed as such? In reality it's the other way round. This is also misleading when it comes to catchment areas, with swathes of north Battersea shown within reach of such space compared to, say, streets off Northcote Road. Again, in reality the area "between the Commons" currently has much better public access to green space than areas neighbouring the Thames Path, with a street pattern that feels both safer and easier to read. Good sightlines and high quality connections for pedestrians and cyclists are critical aspects of access for any local amenity.</p> <p>Table 6.2, p47 seems to include land in housing estates, where there might be public access but not public use; indeed, many estates are designed to dissuade non-</p> <p>Official residents from passing through. There should be some discussion about how green space in estates might be opened up and used more beneficially, for instance by encouraging community gardening initiatives, which could go some way to address the absence of allotments in Battersea, or providing additional play space. Also, there should be a presumption against gated developments. Privately owned open space has been omitted from the Study; as this does contribute to overall local biodiversity, we believe it should be taken into consideration too.</p> <p>P51. Harroway Road (correctly, Harroway Gardens) scores second highest for quality, but the draft Local Plan (RIV 7) suggests a need for substantial improvements. This leads us to question the validity of the scoring system used for this Study.</p> <p>P56. Discusses facilities for children and young people. It refers to play equipment, more robust equipment for older age ranges such as skate parks,</p>		



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>BMX, basketball courts and Multi Use Games Area (MUGAs) and youth shelters. This really should be more than one group.</p> <p>Properly equipped and maintained play areas for young children are good measures. Here a finer grain of distribution and safe access to play equipment would be even more useful as such equipment is not confined to larger open spaces.</p> <p>Similarly, the distribution of ball courts, basketball hoops, etc. should be assessed at a more detailed level, as should areas of deficiency. Skate parks and BMX tracks have wider catchment areas and as with ball courts form part of sporting provision, not just for young people, but people of all ages.</p> <p>We have doubts about the usefulness of youth shelters within open spaces; teenagers want safe places to meet, just like anyone else, and don't need a designated structure. Also, these facilities need to be read against indoor spaces where they can meet to attend clubs etc. We note too that there was no targeted consultation of young people.</p> <p>Table 9.3, p75. We again question the validity of the scoring system used when we see Battersea Rise Cemetery's poor result. Some work to the chapel building and headstones would doubtless improve public perceptions but given that it is no longer actively used for burials, we feel it is being well managed as a semi-natural space by Enable. It is a place of great character and charm, especially picturesque in spring and early summer, and providing a peaceful haven for both humans and wildlife at all times of the year.</p>		
Clare Graham	Chair of Open Spaces Committee Battersea Society			493	General Open Space Study Comment	<p>Para 21.8. "To support all this work, the Council has produced an Open Space Study which catalogues and assesses all the open and green space in Wandsworth. The study has identified all the areas that are deficient in open space in the borough and ways for them to be improved. The Open Space Study is accompanied by the Open Space Strategy which sets aims and targets for all underperforming green spaces in Wandsworth and helps guide the borough towards its goal of becoming the greenest inner London borough." That may have been its purpose, but much more detailed analysis is required to achieve this ambitious objective. When will the Open Space Strategy mentioned appear? How will the Open Space Study inform it? At present all that has been presented are a few "strategic recommendations" at the end of the Study. The Strategy should form part of the Plan, and it should provide a comprehensive policy for protecting, enhancing and increasing open space provision, including specific targets and actions.</p>	Open Space Study comments have been noted.	No changes to the Local Plan are considered necessary.
Mr Richard Fox				605	21.8	<p>Pleased to hear that CAVAT system is to be used and that a Tree Strategy is be approved. I hope this will take on board all the recommendations made in the Tree Wardens draft Tree strategy dated May 2017</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Steve Kersley	Spencer Cricket			633	General Open Space Study Comment	<p>2.It is also consistent with concerns we have with the Open Spaces Study (OSS), which has been completed but again with no reference to sports users or as far as we can tell, even information provided to those users so that they may contribute, unlike other community groups. This has led to a lack of input from the former.</p> <p>3.The OSS (p2) sets out typologies for different spaces. "Sportsground" is not one of the typologies.</p> <p>4.Therefore Springfield Hospital and Fishponds (wrongly) are classed as amenity greenspace (p10) and are identified as possible spaces that can address open space deficiencies in the Tooting Ward (see references on p28, 47, 87, 88, and 90). Nothing is said about the statutory protection of Fishponds as a sportsground; rather the report highlights the Forever Fishponds group's suggestion of redesignating the Fields as a Local Park and Open Space due to incorrect assertions about usage (p57). The OSS refers to protection for sports pitches and to the PPS generally but is unable</p>	Open Space Study comments have been noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>to properly highlight the borough's deficiency in pitches and facilities for the reasons above. This is a major flaw and concern.</p> <p>5.The designation for Springfield Hospital relates to the grassed and planted areas of the hospital, whereas the former golf course is omitted from the map on p10 of the OSS. The designation of Springfield Park should be as a Park or Garden and it should be noted that the new park is required to have sports facilities to replace the golf course in line with the appeal decision.</p> <p>Other points we would raise:</p> <p>6.All open space, including private open space, should be covered in the Study, noting the contribution that private spaces can make to biodiversity within a green network;</p> <p>7.Whether within an OSS or linking with a PPS, all smaller sports facilities (eg ball courts, MUGAs) should be mapped separately from children's play spaces. If in a PPS, there should be strong cross-references between it and the OSS;</p>		
Jesse Honey				865	General Open Space Study Comment	<p>Paragraph 21.8 refers to an Open Space Study and Open Space Strategy but these are not accessible on the Council website3 (despite the invitation to refer to the Study in 21.12), so it is not possible to determine their quality, relevance or the extent to which they have informed Policies LP55 and LP56. This makes it hard to establish if the draft Plan is in conformity with London Plan policy G1 Green Infrastructure Parts B and C. Additionally, it is not clear how, or if, the climate emergency declaration and the WESS have informed the Open Space Study and Strategys conclusions. Given the lack of mention of either the declaration or the WESS anywhere in Chapter 21, it seems that they have not, but, if so, this indicates another failure of joined-up planning. The WESS is directly relevant to green infrastructure policy in that it supports increasing biodiversity, involving local community groups in doing so, and promoting community climate action (whilst maintaining sports provision). Furthermore, Urban Greening and Open Spaces is one of seven major themes in the WESSs Climate Action Plan, recognising green infrastructure as playing a critical role in increasing Londons capacity to adapt to climate change</p>	Open Space Study comments have been noted.	No changes to the Local Plan are considered necessary.
ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1002	General Open Space Study Comment	<p>Approach to green infrastructure The emerging plan's chapter and policy on green and blue infrastructure is generic and insufficiently place-specific. Paragraph 21.8 refers to an Open Space Study and Open Space Strategy but these are not accessible on the Council website3 (despite the invitation to refer to the Study in 21.12), so it is not possible to determine their quality, relevance or the extent to which they have informed Policies LP55 and LP56. This makes it hard to establish if the draft Plan is in conformity with London Plan policy G1 Green Infrastructure Parts B and C. Additionally, it is not clear how, or if, the climate emergency declaration and the WESS have informed the Open Space Study and Strategy's conclusions. Given the lack of mention of either the declaration or the WESS anywhere in Chapter 21, it seems that they have not, but, if so, this indicates another failure of joined-up planning. The WESS is directly relevant to green infrastructure policy in that it supports increasing biodiversity, involving local community groups in doing so, and promoting community climate action (whilst maintaining sports provision). Furthermore, Urban Greening and Open Spaces is one of seven major themes in the WESS's Climate Action Plan, recognising green infrastructure as playing a critical role in increasing London's capacity to adapt to climate change.</p>	Open Space Study comments have been noted.	No changes to the Local Plan are considered necessary.
Mr Richard Fox				606	21.9	<p>Development does not have to be ON a greenspace to impact on it. Developments that are near to open spaces may affect its character, by blocking light, disrupting site lines increasing congestion etc</p>	Comments noted. LP55 (D) explains New development on or affecting public and private green and blue infrastructure will only be permitted where it does not harm the character, appearance or function of the green or blue infrastructure. In assessing proposals, any impacts of the cumulative effect of development will be taken into account.	No changes to the Local Plan are considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1578	21.9	<p>21.9 Definitions;</p> <p>For 'Green &amp; Blue Infrastructure: 'Comprises the network of parks, rivers, water spaces and green spaces,. . .' replace with 'Comprises the network of</p>	The existing wording is considering sufficient.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						parks, private front and rear gardens, rivers, water spaces and other green spaces.. . .		
Clare Graham	Chair of Open Spaces Committee  Battersea Society			496	21.10	Para 21.10 includes the line: "All types of green and open spaces including small sections of landscaping and front gardens all provide opportunities for biodiversity which benefit Wandsworth's wildlife." Therefore, the loss of front gardens is to be resisted for its negative impact on biodiversity, and also on water management. New measures should be included both to promote re-greening, and to educate about the damage caused by removing them or replacing them with hard surfacing or artificial turf.	LP5 Residential Extensions and Alterations supports development that includes hardstandings constructed from permeable materials.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee  Battersea Society			497	21.11	Para 21.11."Green and blue infrastructure often relate directly to place-making and enhancing local character. At a wider scale, they can contribute to local identity and landscape character. Wandsworth's green and blue infrastructure, in particular its street trees, soft landscaping, roof gardens, green/brown roofs and walls, and the Wandle Valley, form a green corridor performing a range of functions and delivering a wealth of benefits for the local population and wildlife." Please clarify what point is being made here. We welcome recognition of the value of green corridors, but they also need to be protected, improved and promoted through specific measures.	This paragraph highlights the importance of green and blue infrastructure to character and local identity. LP55 Protection and Enhancement of Green and Blue Infrastructure provides protection for these areas and types of infrastructure. Wandsworth intends to prepare its own Urban Greening Factor and supporting guidance for greening as is required by the London Plan that will outline specific measures that will enhance green corridors.	No changes to the Local Plan are considered necessary.
Steve Kersley	Spencer Cricket			636	21.14	10.In discussing the OSS on p368, para 21.14 states: "Given the limited potential for urban areas such as Wandsworth to provide new open spaces, the study assessed the potential for improvements and increased access to existing open spaces to better meet the needs of users. This has helped inform the Council's Parks Management Strategy and has informed the requirements for open space provision set out in the Planning Obligations SPD." How will a new PPS feed into these and does this not demonstrate the problem with not having the PPS available to this consultation?	The PPS will look at all available sites to help meet any deficiencies in playing pitches in the borough. It has been discussed with Local Clubs and the National Governing Bodies of all major sports have been consulted regularly throughout the process.	No changes to the Local Plan are considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1580	21.14	21.14 The 'Wandsworth Open Space Study' does not appear to be publicly accessible(?)	The Open Space Study was available for download on the Council's website and could have been made available upon request.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			349	21.15	As yet there is no Biodiversity Action Plan. Currently the Biodiversity Strategy is going through the approval process.	Comment noted.	The Local Plan has updated information about the current status of the Adopted Biodiversity Strategy and the Biodiversity Action Plan which is forthcoming.
Clare Graham	Chair of Open Spaces Committee  Battersea Society			498	General Open Space Study Comment	Para 21.15. It's not clear how GiGL (Greenspace Information for Greater London) correlates with the Open Space Study as it is not referred to within that Study. There is reference to local GiGL deficiency areas. If the GiGL is to form the basis of Open Space policy, then this should be explained.	Open Space Study comments have been noted.	No changes to the Local Plan are considered necessary.
Jon De Maria				961	21.16	<p>THE PROBLEM: There is a recognised lack of local youth sports pitches in the borough for winter sports use. For example, there are only 2x intermediate grass pitches catering for U14 to U17 youth football in the entire borough.</p> <p>I help run a local youth football club with estimated numbers reaching c150 players in the coming years. We currently have no real idea or comfort where the various age group teams from U12s up to U19s will be able to play.</p> <p>THE SOLUTION: Therefore our young players would very much appreciate if the new Local Plan would allow for the provision of new pitches, especially to the east of the borough (ie, in and around Battersea). Ideally these pitches would be a 3G or 4G type surface and floodlit to allow midweek winter training/playing. Any such new pitch venues to be private and/or public sector sourced/managed.</p> <p>THE BENEFITS: Local boys and girls will benefit from outdoor exercise doing something they enjoy.</p>	The Playing Pitch Strategy has identified local demand and need and proposes solutions for where new playing pitches could be located.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			351	21.17	We welcome the possibility of more designated quiet areas.	Comment noted.	No changes to the Local Plan are considered necessary.
Julie McPhillips				979	21.17	You speak of 'Quiet Areas' and I would like to see you add our cemeteries to that list. I find that far too many people have music blaring whilst visiting graves when there may be other people who just want a quiet moment. I would like to see noise pollution mentioned in this proposal and have a borough wide ban on loud music whether it is coming from cars or peoples homes.	Comment noted.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee Battersea Society			501	21.18	21.18. "This policy seeks to maintain, and where possible improve, the quality and provision of Public Open Space, sports fields and pitches and play areas in the borough, particularly in areas identified as deficient." As the quality of playing pitches has been in decline for many years, it would be helpful to include strategies and policies to reverse this trend. We urge the council to include clear measures for this transformation.	The Playing Pitch Strategy has reviewed with the assistance of local clubs and the National Governing Bodies of the major sports the quality and quantity of pitches in the borough and proposes solutions improvements.	No changes to the Local Plan are considered necessary.
Steve Kersley	Spencer Cricket			635	21.19	9.On p 372, the Plan notes that a PPS is being prepared and is due for completion in 2021. It could be argued that this will address some of the points above. It could do if the different areas of work are pulled together and the weight and relevance of each document is made clear. It's obviously a complex matter, but it does seem that sport and sports users are somewhat marginalised.	Comments noted. The Playing Pitch Strategy has involved the majority of sports clubs in the borough across all major sports and the National Government Bodies of all major sports have been frequently consulted with.	No changes to the Local Plan are considered necessary.
Steve Kersley	Spencer Cricket			632	21.21	On behalf of Spencer Cricket Club (with more than 1,500 local residents as members), I would make the following comments regarding the draft Wandsworth Local Plan (WLP):  1.Foremost is our concern is that the Playing Pitch Strategy (PPS) which feeds into the WLP has not been completed and will not be for potentially another year. It is disappointing that the information that all the local sports clubs and users have provided has not been used as part of the evidence base. Regrettably, this is consistent with other Council documents such as the Wandsworth Common Management & Maintenance plan which repeatedly failed to consult the sports users.	Comments noted. The Playing Pitch Strategy has involved the majority of sports clubs in the borough across all major sports and the National Government Bodies of all major sports have been frequently consulted with. Due to Lockdown restrictions in 2020 the PPS had to be postponed and was not ready in time for the Regulation 18 Local Plan Consultation.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee Battersea Society			502	21.24	21.24. "For all proposals affecting areas of open or used for sport or recreation the following will be important considerations with any application and the assessment of whether the proposed development is suitable." This paragraph seems to sit alone and remain incomplete. Does it refer to 21.25-27? Clarification is required.	Paragraph 21.24 related to paragraph 21.21-21.23 which are guidance from the NPPF.	No changes to the Local Plan are considered necessary.
H Monger	Director London Historic Parks and Gardens Trust			1248	21.24	Para 21.24  The list of criteria referred to in the paragraph is missing.	Paragraph 21.24 related to paragraph 21.21-21.23 which are guidance from the NPPF.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			352	21.25	We note that with nursery gardens there is a presumption against development (para 21.25) – regrettably that's too late for the destruction of the Adrian Hall nursery at the top of Erpingham Road, against enormous local opposition.	Comment noted.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			353	21.26	While encouraging use of the parks is to be welcomed, their use for festivals should be avoided. Parts of Clapham Common have been badly damaged through overuse – often by commercial events which limit access to a public open space. In addition they can result in disturbance to both wildlife and neighbours.	Any proposal for a temporary use on public open space would be considered individually by the development management team who would assess the proposal against town centre policies, industrial policies or housing protection policies where relevant.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee			503	21.26	21.26.Covers, very briefly, the use of outdoor space for cultural events. Does the Council have a policy for this, and if so, what measures are being proposed?	Any proposal for a temporary use on public open space would be considered individually by the development management team who would assess the proposal against town centre policies, industrial policies or housing protection policies where relevant.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Battersea Society							
Terence Brown	Coordinator Wandsworth Friends of the Earth			1581	21.26	21.26 Use of outdoor spaces for 'cultural activities' needs to be seen in the light of biodiversity needs; 'cultural uses' of significant impact should require temporary planning permission.	Any proposal for a temporary use on public open space would be considered individually by the development management team who would assess the proposal against town centre policies, industrial policies or housing protection policies where relevant.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			355	21.28	Hedgehogs should be added to the list of notable wildlife. They are officially now vulnerable to extinction and this, the most westerly part of Wandsworth (Putney Lower Common, Dover House Estate and going towards Barnes Common) is one of the few areas in London where they are found. The council have recently acknowledged their presence here as significant by agreeing to put up road signs. Including them in this Plan could potentially strengthen support and protection for them.	Hedgehogs are included as priority species in the Biodiversity Strategy	No changes to the Local Plan are considered necessary.
Mr Michael Priaulx	Swifts Local Network: Swifts & Planning Group			279	21.29	<p>The reference in paragraph 21.29 to biodiversity features is welcome, but at present this doesn't reflect national and London guidance to make reference to artificial nesting features such as swift bricks. This is important because the national biodiversity net gain methodology does not give any value to existing populations of birds using buildings, nor to provision of nesting sites to cavity-nesting birds, both especially crucial in urban areas with many species such as swifts, sparrows and starlings now endangered.</p> <p>Therefore please amend the first sentence of paragraph 21.29 as follows:</p> <p><i>"In addition, protecting and enhancing biodiversity, including the provision of new habitats and features <b>such as swift bricks, bat boxes, and hedgehog highways</b>, increases the resilience of our ecosystems and helps the physical environment to change and adapt to different stresses."</i></p> <p>This is based on the following policies (the same as for my comment on LP57 Biodiversity clause B2):</p> <p>National Planning Policy Guidance (NPPG, 2019) states: "...relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat" (Natural Environment, Paragraph 023, Reference ID: 8-023-20190721).</p> <p>Integral nest bricks are preferable to external boxes as they last the lifetime of the building, have no maintenance requirements, have better temperature regulation with future climate change in mind, and are aesthetically integrated with the building design.</p> <p>Note that swift bricks are used by a wide range of small birds including red-listed house sparrows, as set out in the CIEEM In Practice article (June 2019): <a href="https://cieem.net/resource/the-swift-a-bird-you-need-to-help/">https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</a></p> <p>London Plan (Publication issue, December 2020) states: "Policy G6 Biodiversity and access to nature... B: Boroughs, in developing Development Plans, should: ... 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context" (page 362).</p> <p>We highlight that recent updates to Local Plans by Bexley, Islington, Merton, and other London boroughs, have made specific references to swift bricks in this context.</p> <p>In addition, the Living With Beauty report by the government's Building Better Building Beautiful Commission (30/01/20) recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110).</p> <p>Therefore reference to bee bricks could also be added.</p>	<p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p> <p>The forthcoming Biodiversity Action Plan will provide guidance for protected species.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Robert Arguile	Chair The Putney Society			356	21.30	Needs to cite the Council's Biodiversity Strategy and, when it has been produced, the Biodiversity Action Plan.	The Biodiversity Strategy has been adopted and a Biodiversity Action Plan is forthcoming.	Supporting text amended to reference Biodiversity Strategy and Biodiversity Action Plan
Emma Broadbent	London Rivers Officer South East Rivers Trust			263	21.31	Section 21.31 mentions external lighting taking account of existing biodiversity but this policy would be strengthened by inclusion of a specific reference to the impact of artificial lighting on wildlife within the policy LP57 Biodiversity. This should include a requirement for no new light to be cast upon the river and the vegetation along its banks. Lighting should be motion sensitive where possible and of a type and quality that does not impact wildlife.	This is considered to be too restrictive and the current policies are sufficient for appropriate developments to come forward.	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			357	21.31	Protection and enhancement of biodiversity should be integral to any new development scheme, not just an "add-on". We also welcome the concept of the protection of green corridors during construction work.	Comments noted.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee Battersea Society			505	21.31	21.31. We recommend strengthening the wording. Rather than new development "should include..." this should read: "enhancement to biodiversity should be embedded in the design process at an early stage and be an integral part of any approved scheme."	The existing wording is considering sufficient for appropriate developments to come forward.	No changes to the Local Plan are considered necessary.
Isabella Jack	Sustainable Development Advisor Natural England			1611	21.32	<p><b>See attachment on comment 1608 for context and appendices</b></p> <p>1. Biodiversity Net Gain</p> <p>Development proposals should protect and enhance the nature conservation, or geological interest, of nationally important wildlife sites. This will be achieved by refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations.</p> <p>There is a strong likelihood that mandatory net gain will come forward soon. This would mean that all development would need to provide net gain. It is up to the Council to decide whether they want to futureproof their Local Plan to incorporate mandatory net gain for all developments now, or update as appropriate when mandatory net gain officially comes through. We note that this is mentioned in paragraph 21.32, but we would advise that this could go further to allow provision for the development of a specific SPD on net gain that will outline in detail, Council expectations of developers and mechanisms for delivery. Natural England would be happy to engage with the Council on implementing net gain into local policy.</p> <p>Biodiversity Net Gain is strongly supported by the National Planning Policy Framework (NPPF) and features prominently in the government's 25 Year Environment Plan. We therefore recommend policy inclusion of biodiversity net gain and the use of an approach based on the Defra biodiversity metric. Natural England has released the Defra Biodiversity Metric 2.0, while Metric 3.0 is due to be published in April 2021. Development should seek to use the most up to date version of the metric available. The new metric is accompanied with detailed guidance and a tool to apply the metric. Natural England encourages the incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain.</p> <p>The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. We support the production of a Green Infrastructure Strategy that would plan for GI on a more strategic level. Planning policies and decisions should contribute and enhance the natural</p>	<p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p> <p>The Biodiversity Strategy has been adopted and a Biodiversity Action Plan is forthcoming.</p> <p>Wandsworth intends to prepare its own Urban Greening Strategy to support Urban Greening Factor and will provide guidance on green infrastructure in the borough.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.  Natural England would like to draw your attention to Annex A which contains useful resources as well as advice and benefits of embedding biodiversity net gain into the Local Plan.		
Mr Richard Fox				608	21.33	More accurate information should be given about the loss of trees. The Council is good at saying how many new trees are planted but largely silent about how many are lost each year. The tree canopy may be in long term decline for all we know. Figures for both planting and losses should be published	The Council is preparing a Tree Strategy which will provide more detail around the planting of trees in the borough.  The Council is committed to planting more trees in the borough and has successfully increased the net number of trees in the borough over the past years. No changes to the Local plan are considered necessary,	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			359	21.35	Trees on council owned land including housing estates and schools need protection too. TPOs are not used in these locations - what other protection is in place?	Trees within Conservation Areas are also protected by the same requirements placed on TPOs. All other trees are required to be retained and protected in line with LP58 Tree Management and Landscaping.	No changes to the Local Plan are considered necessary.
Mr Richard Fox				609	21.37	How can this be when major redevelopment plans actively cut down huge numbers of trees. And what does the last sentence mean.? Developer contributions towards trees may be required where appropriate. Who decides what is appropriate?	All other trees are required to be retained and protected in line with LP58 Tree Management and Landscaping. Developers may be required to provide a financial contribution toward the management and maintenance of trees in the public realm that are not within their proposed site boundary.	No changes to the Local Plan are considered necessary.
H Monger	Director London Historic Parks and Gardens Trust			1247	21.38	Omissions  Views  This is possibly an omission  We are looking for detailed policies which apply to development within and adjacent to designed landscapes to ensure there is no adverse impact on designed views into, as well as from, the landscape. This is partially covered in the tall buildings policy LP3 in relation to protected views but should apply to all development. The impact on the experience of being within a park or open space is also important for mental healthy and perceptions of tranquillity.	LP3 The Historic Environment part C explains that development proposals should protect, and whenever possible enhance strategic and locally important views. Development proposals should provide appropriate supporting evidence to demonstrate acceptable visual impact on protected views. Additionally the Local View SPD provided additional information about important local views.	No changes to the Local Plan are considered necessary.
Mr Richard Fox				613	21.41	First priority should be to preserve existing trees. This makes economic as well as environmental sense as to replace one mature tree under CAVAT requires the planting of multiple new trees	LP58 Tree Management and Landscaping requires the retention and protection of existing trees and any tree that is required to be felled will require a financial contribution in line with CAVAT.	No changes to the Local Plan are considered necessary.
Lucinda Robinson	Marine Management Organisation			487	21.46	Dear Sir/Madam,  <b>MMO Marine Planning and Marine Licensing response to Wandsworth Draft local Plan</b>  Thank you for giving us the opportunity to comment on the Local Plan. The comments provided within this letter refer to the document entitled Wandsworth Draft local Plan  As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.  Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are	Safeguarded landing facilities: Policy LP 43 of the draft Local Plan identifies that the borough's five wharves will be safeguarded, and is considered to be consistent with the requirements of SF-INF-2.  Seascapes: Wandsworth does not have any seascapes however landscapes are considered in LP58 Tree Management and Landscaping and the Council find that the policy will sufficiently protect landscapes and provide flexibility for appropriate developments to come forward.  Access: LP60 River Corridors (A) explains that the natural, historic and built environment of the River Thames corridor and watercourses within the borough will be protected and, where appropriate, enhanced to ensure the achievement of a high quality and accessible environment including through the provision of connections to existing and new communities and to maximise biodiversity benefits. LP61 Riverside Uses, Including River Dependent, River-related, and River Adjacent Uses will be updated to support proposals which include appropriate enhanced and inclusive public access to and within the marine area  Heritage:	Amend LP61 A to include "Provides appropriate enhanced and inclusive public access to and within the marine area"  Amend the supporting text of Policy LP60 to include reference to the South East Marine Plan and the Coastal Concordat.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>included. In the case of the document stated above, the draft South East Marine Plan is of relevance. The draft plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the draft South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.</p> <p><b>Marine Licensing</b></p> <p>The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area.</p> <p>The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.</p> <p>The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.</p> <p>Summary notes</p> <p>Please see below suggested policies from the Draft South East Inshore Marine Plans that we feel are most relevant to your local plan.</p> <p>These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:</p> <p>SE-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. •SE-INF-2:</p> <p>(1) Proposals for alternative development at existing safeguarded landing facilities will not be supported.</p> <p>(2) Proposals adjacent and opposite existing safeguarded landing facilities must demonstrate that they avoid significant adverse impacts on existing safeguarded landing facilities.</p> <p>(3) Proposals for alternative development at existing landing facilities (excluding safeguarded sites) should not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport.</p> <p>(4) Proposals adjacent and opposite existing landing facilities (excluding safeguarded sites) should demonstrate that they will in order of preference:</p> <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> </ol>	<p>Policy LP3 sets out the Council's approach to managing heritage.</p> <p>Biodiversity: LP57 Biodiversity A outlines that the Council will protect and, where appropriate, secure the enhancement of the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites.</p> <p>Wandsworth has no coastal environment and therefore SE-BIO-3 does not apply.</p> <p>Climate change: LP10 Climate changes sets out the Council's approach to minimising and mitigating against the effects of Climate change.</p> <p>Water Quality and flood risk: LP12 Flood risk outlines what is expected of development to ensure flood risk and water quality has been understood and managed effectively. Development which is built during the Local Plan period will be expected to have a life to the end of the century and beyond, and therefore it must be designed and built to accommodate potential future flooding events.</p> <p>LP14 Air quality, pollution and LP10 Climate Change: This policy sets out how proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increase greenhouse gas emissions, they must demonstrate that they will minimise and mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives.</p> <p>Changes regarding the South East Marine Plan and the Coastal Concordat will be added.</p>	



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>3. c) mitigate significant adverse impacts on existing landing facilities</p> <ul style="list-style-type: none"> <li>• SE-AGG-1: Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised, unless it is demonstrated that the other development or activity is compatible with aggregate extraction.</li> <li>• SE-AGG-2: Proposals within an area subject to an Exploration and Option Agreement with The Crown Estate should not be supported unless it is demonstrated that the other development or activity is compatible with aggregate extraction.</li> <li>• SE-AGG-3: Proposals in areas where high potential aggregate resource occurs should demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate significant adverse impacts on aggregate extraction</li> <li>4. d) if it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.</li> </ol> </li> <li>• SE-HER-1: Proposals that demonstrate they will conserve and enhance elements contributing to the significance of heritage assets will be supported. Proposals unable to conserve and enhance elements contributing to the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> </ol> </li> </ul> <p>c)mitigate harm to those elements contributing to the significance of heritage assets</p> <ol style="list-style-type: none"> <li>1. d) if it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage</li> </ol> <ul style="list-style-type: none"> <li>• SE-SCP-1: Proposals that may have a significant adverse impact upon the seascapes and landscapes of an area should only be supported if they demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate</li> <li>4. d) if it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascapes and landscapes of an area. Where possible, proposals should demonstrate that they have considered how highly the seascapes and landscapes of an area is valued, its quality, and the areas potential for change. In addition, the scale and design of the proposal should be compatible with its surroundings, and not have a significant adverse impact on the seascapes and landscapes of an area.*</li> </ol> </li> </ul> <p>SE-EMP-1: Proposals that result in a net increase to marine related employment will be supported, particularly where they meet one or more of the following:</p> <ol style="list-style-type: none"> <li>1. i) create employment in areas identified as the most deprived, or</li> </ol>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2. ii) support and are aligned with local skillsstrategies and the skills available in and adjacent to the south east inshore marine plan area, or</p> <p>iii) create a diversity of opportunities, or iv) implement new technologies. •</p> <p>SE-CC-1: Proposals which enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts, or, as a last resort, d) compensate and deliver environmental net gains in line with and where required in current legislation.</p> <ul style="list-style-type: none"> <li>• SE-CC-2: Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.</li> <li>• SE-CC-3: Proposals in the south east marine plan area and adjacent marine plan areas that are likely to have significant adverse impacts on coastal change should not be supported. Proposals that may have significant adverse impacts on climate change adaptation measures outside of the proposed project area must demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate the significant adverse impacts upon these climate change adaptation measures.</li> </ol> </li> <li>• SE-AIR-1: Proposals must assess their direct and indirect impacts upon air quality and emissions of greenhouse gases and air pollutants. Where proposals are likely to result in air pollution or increased greenhouse gas emissions, they must demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate air pollution and or greenhouse gas emissions in line with current national and local air quality objectives and legal</li> </ol> </li> <li>• SE-WQ-1: Proposals that enhance and restore water quality will be supported. Proposals that cause deterioration of water quality must demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate deterioration of water quality in the marine environment.</li> </ol> </li> <li>• SE-ACC-1: Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, and also demonstrate the future provision of services for tourism and recreation activities, will be supported. Where appropriate and inclusive enhanced public access cannot be provided, proposals should demonstrate that they will, in order of preference:               <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate significant adverse impacts on public</li> </ol> </li> </ul>		

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ul style="list-style-type: none"> <li>• SE-TR-1: Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order of preference:                             <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate that</li> </ol> </li>   <li>• SE-BIO-1: Proposals that enhance the distribution of priority habitats and priority species will be supported. Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:                             <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate</li> <li>4. d) compensate for significant adverse impacts.</li> </ol> </li>   <li>• SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference:                             <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate significant adverse impacts</li> <li>4. d) compensate for significant adverse impacts.</li> </ol> </li>   <li>• SE-BIO-3: Proposals that deliver environmental net gain for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services will be supported. Proposals must take account of the space required for coastal habitats where important in their own right and/or for ecosystem functioning and provision of ecosystem services, and demonstrate that they will in order of preference:                             <ol style="list-style-type: none"> <li>1. a) avoid</li> <li>2. b) minimise</li> <li>3. c) mitigate</li> </ol> </li> </ul> <p>d) compensate for net habitat loss and deliver environmental net gain.</p>		
Lucinda Robinson	Marine Management Organisation			488	21.46	<p>Further points to note</p> <p>Page 379 (Section 21.46) : You refer to the MMO and the Marine Policy Statement, We would also recommend you mention the draft South East Marine Plan here. The SE marine plan is due to be adopted in Spring 2021, so the plan will go from its current state of "material for consideration" to having the full weight of an adopted plan. Under the Marine and Coastal Access Act, any authorisation or enforcement decisions must be made in accordance with the marine plan. Any other decisions which may impact the marine area must have regard to the marine plan.</p> <p>Page 379: You also refer to the need for Marine Licences, please ensure that the coastal concordat is mentioned here. The</p>	Comments noted	The supporting text has been updated to reflect the importance of the South East Marine Plan and the Coastal Concordat for applicants to consider the policies mentioned in this representation

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Coastal Concordat, requires each council to be signed up by 2021. This is mentioned in the 25 Year Environment Plan, for further information please see:</p> <p>"The government's 25 Year Environment Plan includes a commitment for all local authorities with a coastal interest in England to be signed up to the coastal concordat by 2021. The concordat will be periodically reviewed, as was done in 2018 and 2019 to monitor the progress of this commitment."</p> <p>The East Inshore and East Offshore Marine Plans were adopted in 2014, and the South Inshore and Offshore Marine Plan was adopted in 2018, which cover the adjacent areas. Please ensure correct reference to the South East, South, and East marine plan areas where included.</p> <p>A South East Marine Plan Implementation Training session was held in March 2020. This provided an introduction to marine planning, and I would suggest re-visiting the material in our recorded webinar which supported the Consultation of the draft South East Marine Plan. Please let me know if you have any questions regarding implementation of the marine plan.</p> <p>As previously stated, these are recommendations and we suggest that your own interpretation of the South East Marine Plan is completed. We would also recommend you consult the following references for further information: Draft South East Marine Plan and Explore Marine Plans.</p>		
Mr Robert Arguile	Chair The Putney Society			391	21.49	<p><i>'Moorings and other river infrastructure can create interest and encourage activity on the Thames riverside, particularly at riverside focal points of activity. Short-stay moorings can provide important recreational facilities and support greater leisure uses on the Thames.'</i> Agreed.</p> <p><i>'However, permanently moored vessels can also potentially form a barrier between the river and people on the banks and can affect the open nature of the riverside and harm neighbouring residents' amenity; particularly large floating homes, buildings or structures which are significantly different in terms of mass and character to typical houseboats. The cumulative impact of development in the river will be taken into account to ensure that the character and open nature of the river is not harmed.'</i> Supported</p> <p>Short-stay moorings are to be encouraged, although along some parts of the river they can be difficult to find. Thames Tideway are to be commended in making provision for short-stay moorings on the promontory on Putney Embankment. Much has been made in the Strategy for Putney of the need to provide access to the river. Conversely river users should be able to gain easy access to Putney.</p> <p>Traditional houseboats add character and atmosphere to the river - for example the long established moorings at Hammersmith Mall and Cheyne Walk. In the past PLA regulations required such vessels to be able to manoeuvre under their own power. However this requirement seems to have been forgotten which has led to a proliferation of permanently moored 'floating houses', sometimes of significant height, which block views of the river. An example of this sort of development can be seen at Point Pleasant in the Riverside quarter. The West London River Group, of which the Putney Society is a member, has stated: "<u>The public have a right to expect that the impact the presence of residential craft will have on sight lines, local landscape and character is thoroughly assessed before approval is given. We believe that riparian boroughs should include in their local plans, guidance and regulations which address the siting, construction, size and detailing of any vessel moored permanently or semi-permanently and used as a residence</u>".</p> <p>At one point, Livetts Launches wanted to put a load of houseboat moorings at Putney Pier. They should be discouraged from attempting that again.</p>	Comments noted. The Local does wish to encourage short stay moorings and discourage a proliferation of permanently moored vessels due to the reasons outlined in paragraph 21.49.	No changes to the Local Plan are considered necessary.
Mr Robert	Chair			347	Map 21.1	<p>It is interesting to note that despite Putney being seen as a locale full of green spaces, the areas of Thamesfield and East Putney on each side of the District Line have very little green space once past Wandsworth Park. This</p>	Comment noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Arguile	The Putney Society					stresses the importance of the green corridor provided by the embankments of the District Line.		
Clare Graham	Chair of Open Spaces Committee  Battersea Society			494	Map 21.1	Map 21.1 shows open spaces in the borough and describes them as a network. The notion is very welcome, but needs a clear strategy if it is to become a reality. Places will only become a network through connection. There will be different requirements for people and for biodiversity, but joining open spaces together can hugely benefit both safe walking and cycling, and ecological potential and habitat creation. Measures for creating such linkages should be included within the Local Plan; ideally all open spaces should be linked, and maps should identify how those connections are made. Local strategies should be put in place to create and upgrade links. We recommend that such a strategy is included in future versions of the Local Plan. It should include an assessment of entrances to spaces. Improving connections and access to spaces can have as much benefit as the provision of a brand-new space; if places can be conveniently accessed, they are likely to be well used.	Wandsworth is preparing an Open Space Strategy that will help guide the existing open spaces forward in line with the targets and objectives set out in the WESS and in the Local Plan.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee  Battersea Society			499	Map 21.2	Map 21.2 on p370 shows access to various types of open space, taken from evidence in the Open Space Study. Again, with only a small part of Wandsworth Common classified as natural and semi-natural space, its catchment area is consequently reduced; proximity to Wimbledon Common/Putney Heath, the River Wandle and River Thames is currently shown as much more significant. Thus the Arndale and Winstanley Estates are deemed within catchment areas, while the area between Wandsworth and Clapham Commons is outside. This reads strangely, or is the implication perhaps that the management regimes of the Commons require reworking, to enhance their biodiversity?	Wandsworth Common has been classified based on the most predominant typology. The typologies will have different implications for the management and maintenance of each open space.	No changes to the Local Plan are considered necessary.
H Monger	Director  London Historic Parks and Gardens Trust			1246	Map 21.2	Map 21.2 open space accessibility  We question the 480m distance when 400m is generally used as a maximum walkable distance to facilities.  Too many layers obscure policy priority areas. Which areas are more than 400m from a publicly accessible open space?	The 480m distance is based on Field in Trust guidelines which have been followed through the Open Space Study.	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee  Battersea Society			506	Map 21.3	Map 21.3. There is no real mention of SINC (Sites of Importance to Nature Conservation) in the text. Further detail is required to make it a network. The Council should create a policy to make all green spaces SINC over a given period of time, and provide a strategy for achieving this.	Comment noted. The Council intends to update the existing SINC register in the coming years.	LP57 Biodiversity (Now LP55) has been updated to reference Sites of Importance to Nature Conservation at the beginning of the Policy.
Mr Robert Arguile	Chair  The Putney Society			348	Policy LP55	Generally supported.  LP55.E Not surprisingly the Local Plan concentrates on major developments but the plan also needs to acknowledge the loss of green garden space as gardens continue to be paved over, often with impermeable paving.	LP5 Residential Extensions and Alterations provides guidance as to how gardens can be altered including with regards to impermeable paving.	No changes to the Local Plan are considered necessary.
Lois Davis	Co-ordinator  Wandsworth Green Party			470	Policy LP55	<b>URBAN GREENING, NATURAL ENVIRONMENT AND BIODIVERSITY</b>  The Strategic Context, Vision and Objectives state that roughly 25% of the borough is open space. This is, in fact, low compared to the average across all of London, which is 47% . This would suggest that the borough should seek to increase the amount of open space, through development opportunities, not simply to protect the existing or to replace it elsewhere. If 'parklets', which essentially seem to be a couple of benches and a planter on a pavement, are counted as part of open spaces, they should not be. SS1 Spatial Development Strategy should include the presumption that new development must contribute to the overall net open space in the borough and this should be reflected in LP 55 D. "New development on or affecting public and private green and blue infrastructure will only be permitted where it does not harm the character, appearance or function of the green or blue infrastructure. In assessing proposals, any impacts of the cumulative effect of development will be taken into account." This should be strengthened to say that new development is required to add to the quality of	Wandsworth does want to increase the amount of open space in the borough and to become the greenest inner London borough.  Parklets can provide many of the benefits of open spaces that are outlined in the supporting text of LP55 Protection and  Enhancement of Green and Blue Infrastructure and will be considered open spaces.  LP20 New Open Space provides details as to how new open space will be brought forward from new developments.  LP55 Protection and Enhancement of Green and Blue Infrastructure provides sufficient protection and flexibility to help Wandsworth develop as the Council feels is appropriate.  Wandsworth's forthcoming Walking and Cycling Strategy will help create a more connected active travel network that is connected to open spaces. LP59 Urban Greening Factor provides guidance as to the benefit of trees and other greening features with regards to sequestering carbon. LP58 Tree Management and	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>the existing space, by various means such as enlarging and improving the space and the access to it.</p> <p>We welcome the provision in LP 55E "Any development which results in a reduction of green or blue infrastructure assets including protected open space as set out in (B) and (C) above will not be supported. However we find the caveat " unless adequate replacement is provided for" unacceptable; there should be no loss of green and blue assets as a result of development and locating "replacement" elsewhere is equally unacceptable. as this would degrade existing local amenity.</p> <p>We feel that overall accessibility to open/green spaces has not been fully addressed, particularly issues around safe walking and cycling and the crossing of major barriers such as main roads. It is disappointing to see no mention of the carbon capture potential of trees. Wandsworth has lost many trees of amenity value to development and the Council needs to be more ambitious in its requirements to design around mature trees rather than over them. We note in LP58 that the council will 'resist the loss of trees' but strongly feel that the first principle should be a presumption that no trees will be removed and that the council will "rigorously resist" rather than simply "resist" the loss of trees.</p>	Landscaping provides protections for trees and requires replacements to be in line with the CAVAT system.	
Clare Graham	Chair of Open Spaces Committee Battersea Society			495	Policy LP55	<p>Bullet point A of LP55 takes up this theme: "The Council will protect the natural environment, enhance its quality and extend access to it. In considering proposals for development the Council aims to create a comprehensive network of green and blue corridors and places, appropriate to the specific context. In doing so, it seeks to connect and enrich biodiversity through habitat improvement and protection at all scales, including priority habitats and extend access to, and maximise the recreation opportunities of, our urban open spaces." More detail on how this is to be achieved should be included.</p>	The Open Space Strategy will provide details as to how open spaces in Wandsworth can be enhanced and make more accessible.	No changes to the Local Plan are considered necessary.
Ms Bridget Fox	Regional External Affairs Officer (South East) The Woodland Trust			595	Policy LP55	<p>The Woodland Trust welcomes the commitment to protect the natural environment and create a network of green and blue infrastructure. However we would like to see this policy strengthened. Before seeking net gain for biodiversity, planning policies must ensure that any proposed development minimises loss, and avoids damage to any existing high-quality habitats.</p> <p>We suggest rewording E as follows:</p> <p>E. Any development which results in a reduction of green or blue infrastructure assets including protected open space as set out in (B) and (C) above will not be supported other than in exceptional circumstances. Where there is unavoidable loss or harm to green or blue infrastructure, compensatory provision must be made. In determining the amount, form and accessibility of open space provided for within a new development scheme account will not be taken of the proximity and adequacy of existing open space.</p>	LP57 Biodiversity sets out the Council's requirements for Biodiversity Net Gain.	<p>The supporting text of LP57 has been updated to include reference to the Environment Bill.</p> <p>Policy LP55 (e) has been amended to provided clearer and stronger protections for open space.</p>
Ms Bridget Fox	Regional External Affairs Officer (South East) The Woodland Trust			596	Policy LP55	<p>The Woodland Trust welcomes the commitment to protect the natural environment and create a network of green and blue infrastructure. However we would like to see this policy strengthened. Before seeking net gain for biodiversity, planning policies must ensure that any proposed development minimises loss, and avoids damage to any existing high-quality habitats.</p> <p>We suggest rewording E as follows:</p> <p>E. Any development which results in a reduction of green or blue infrastructure assets including protected open space as set out in (B) and (C) above will not be supported other than in exceptional circumstances. Where there is unavoidable loss or harm to green or blue infrastructure, compensatory provision must be made. In determining the amount, form and accessibility of open space provided for within a new development scheme account will not be taken of the proximity and adequacy of existing open space.</p>	LP57 Biodiversity sets out the Council's requirements for Biodiversity Net Gain.	<p>The supporting text of LP57 has been updated to include reference to the Environment Bill.</p> <p>Policy LP55 (e) has been amended to provide clearer and stronger protections for open space.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
H Monger	Director London Historic Parks and Gardens Trust			1243	Policy LP55	LP55 Protection and Enhancement of Green and Blue Infrastructure  In particular Clause D and the recognition of cumulative effects of development.	Comment noted.	No changes to the Local Plan are considered necessary.
Dr David Curran	Lavender Hill for Me			1186	Policy LP55	LP55 Protection and Enhancement of Green and Blue Infrastructure  Support the general policy that smaller areas not identified on the Policies Map will be protected, enhanced and made more accessible. In view of the challenges associated with the previous loss of non recorded open spaces (junction of Taybridge Road / Gowrie Road), we propose that the relatively large Council-owned green space at the junction of the A3220 Elspeth Road and Lavender Hill (not currently on the Policies map) should be added as an Open	The Open Space Study is used to catalogue and assess all the open spaces in Wandsworth and is important for capturing large open spaces on the Policies Map. The OSS uses a threshold of 0.2ha to be included as amenity greenspace or natural and semi-natural greenspace which the land at A3220 Elspeth Road and Lavender Hill does not meet. It will be protected as green space as is mentioned in the policy.	No changes to the Local Plan are considered necessary.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1349	Policy LP55	We would like to make the following suggestions: - The Romany Scout Hut at Lyford Road in Wandsworth Common be added to the list of natural habitats that be protected.	Protections and designations for natural habitats can be reviewed as part of the forthcoming Biodiversity Action Plan.	No changes to the Local Plan are considered necessary.
	Natural England			1357	Policy LP55	Green and Blue Infrastructure  We welcome the inclusion of green and blue infrastructure in Section 21, which refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands. We are pleased to see Wandsworth Councils commitment to protecting the existing green and blue infrastructure, as well as enhancements in the future in line with the Urban Greening Factor to improve green connectivity throughout the borough. A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Natural England welcomes the inclusion of the Urban Greening Factor, as outlined in the emerging London plan, and that all development proposals will be required to follow this	Wandsworth intends to prepare its own Urban Greening Factor and supporting guidance for greening as is required by the London Plan.	No changes to the Local Plan are considered necessary.
Michael Atkins	Senior Planning Officer Port of London Authority			1477	Policy LP55	<b>See the attachment on comment 1441 the representation for context</b>  14. Green and Blue Infrastructure and the Natural Environment  - Policy LP 55: Protection and Enhancement of Green and Blue Infrastructure.  Support policy LP55 particularly part B which states that the Council will protect and extend access to existing public and private green and blue infrastructure in the borough and where appropriate secure its enhancement, including to riverside areas.	Comment noted.	No changes to the Local Plan are considered necessary.
Stephen Knowles				1416	Policy LP55	LP55 E - an adequate replacement must be defined as a greater area with increased biodiversity. Adequate is too vague and unambitious.	LP57 Biodiversity sets out the Council's requirements for Biodiversity Net Gain.	The supporting text of LP57 has been updated to include reference to the Environment Bill.  Policy LP55 (e) has been amended to provided clearer and stronger protections for open space.
Diana McCann	Boroughs Coordinator The Blue			1436	Policy LP55	<b>LP55 Protection and Enhancement of Green and Blue Infrastructure</b>	Wandsworth is required by the London Plan to prepare its own Urban Greening Factor and supporting guidance for greening in the future, however for this Local Plan they are able to follow the London Plan guidance.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
	Green Economy					<p>Suggest addition of new item,</p> <p>Point F. The council will embark on developing and implementing an Integrated Water Resource Management (IWRM) Plan encompassing Rainwater Harvesting (RWH) and all available blue green Technologies (BGT) to complement the natural rivers, streams, other watercourses and bodies of water in order to generate a scaled expansion of green spaces and a program of planting within and on the existing built (grey) infrastructure.</p>		
Mr Robert Arguile	Chair The Putney Society			1685	Policy LP55	<p>Dear Sirs</p> <p>Late Comment Wandsworth Draft Local Plan</p> <p>LP55 Protection and Enhancement of Green and Blue Infrastructure</p> <p>In addition to our previous comments of the Draft Local Plan, The Putney Society would like to make a further comment regarding the planting of Community Gardens and Community Orchards.</p> <p>This reflects the new London Plan Policy G8 Food Growing:</p> <p>"1) protect existing allotments and encourage space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites.</p> <p>2) identify potential sites that could be used for food production." We therefore propose that LP55 includes an additional paragraph:</p> <p>"The Council will protect existing and encourage the development of new community gardens and orchards."</p> <p>Or that paragraph B is amended as shown below:</p> <p>"The Council will protect and extend access to existing public and private green and blue infrastructure in the borough and where appropriate secure its enhancement, including Metropolitan Open Land, major commons, wetlands, rivers, ponds, parks, allotments, community gardens, community orchards, trees and playing fields as well as smaller spaces, including play spaces."</p> <p>We apologise for the late submission of this comment and hope that it can be accepted.</p> <p>Yours sincerely</p> <p>Robert Arguile - Chair</p>	<p>LP21 Allotments and Food Growing Spaces already meets the requested changes expressed above. Additionally the Open Space Strategy has helped identify open and green spaces that could be better utilised as a different open space typology such as community gardens or community orchards. The current wording in the policy does cover allotments and community orchards.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Terence Brown	Coordinator Wandsworth Friends of the Earth			1577	Policy LP55	<p><b>Section 21 Green and Blue Infrastructure and the Natural Environment</b></p> <p><b>LP55 protection and Enhancement of Green and Blue Infrastructure</b></p> <p>1. This clause makes a broad statement of ambition. It is not clear what is meant by 'a comprehensive network of green and blue corridors and spaces, appropriate to specific context'. Further ambitions are included, to 'enrich biodiversity through habitat improvement and protection at all Scales', but also to 'maximise . . .recreation opportunities. . .'. there will be instances where these ambitions are not entirely compatible. There should be some mention here of a resistance to paving over open space and in particular a requirement to use permeable paving in all open spaces. Surface water should be absorbed locally rather than channelled into the borough's combined drainage system.</p>	<p>Wandsworth wants to connect where possible the rivers and parks that are currently separated to create an expansive network of green and blue infrastructure. The policy outlines ambitions the Council has for open space and it feels that it will be required of developers to try and make these ambitions compatible. LP59 Urban Greening Factor requires development proposals will incorporate as much soft landscaping and permeable surfaces as possible.</p> <p>The current clause does require the developer to provide evidence that the proposal will not harm the character, appearance or function of the green or blue infrastructure.</p>	<p>Policy LP55 (e) has been amended to provided clearer and stronger protections for open space.</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>2. Seems basically to amplify the proposal to increase access and improve biodiversity as set out in A and includes private as well as public open space.</p> <p>3. A welcome policy, referring to the 'All London Green Grid Area Framework' in which three area plans affect Wandsworth. These, Wandle Valley, Arcadian Thames and Central London would helpfully be identified here. They each contain extensive local policies.</p> <p>4. This clause should be more strongly worded to emphasise the protection of green and blue infrastructure, suggest: 'New development on, or affecting, public and private green and blue infrastructure will not be permitted unless the developer can prove that it does not harm the character, appearance, <b>ecology</b> or function of the green or blue infrastructure.'</p> <p>This clause effectively waters down clauses (B) and (C). <i>Mature and historic</i> green and blue assets cannot be simply 'replaced' and need to be preserved and conserved in situ.</p>		
Caroline Norrie				20	Policy LP56	GOLF - Wandsworth <b>NEEDS A DRIVING RANGE</b> on tooting common or Springfield. There is nothing to replace the former golf course on the Springfield site.	The inclusion of a driving range on either of those sites would be harmful to the use of Tooting Common and/ or Springfield and contrary to the draft policies. The development of Springfield hospital has included appropriate replacement open space due to the loss of the golf course.	No changes to the Local Plan are considered necessary.
Caroline Norrie				21	Policy LP56	Schools sports - Graveney school needs more space - use of Furzedown rec appropriate (see Bollingbrook academy's use of Wandsworth common.	The Playing Pitch Strategy has identified local demand and need and proposes solutions for where new playing pitches could be located.	No changes to the Local Plan are considered necessary.
Laura Hutson	Sport England			134	Policy LP56	<p>Playing Pitch Strategy</p> <p>The Local Plan should be informed by a robust and up to date assessment such as the Playing Pitch Strategy which I am aware is in the process of being completed for Wandsworth and due to be completed by the end of 2021. Once completed and adopted, Sport England would consider this to be a robust part of the evidence base for sport; this is welcomed.</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Laura Hutson	Sport England			135	Policy LP56	<p>Protecting playing fields and sport facilities – LP56 Open Space, Sport and Recreation</p> <p>Currently the NPPF states: Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li>•an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements</li> <li>•the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location</li> <li>•the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> <p>Sport England notes the inclusion of this text in the Local Plan as supporting text for this policy and is supportive of this inclusion.</p> <p>However, Sport England feels that the text of policy LP56 itself potentially contradicts this NPPF paragraph. It states:</p> <p>A. Any proposal that would result in a loss of sports pitches, playing fields, or land last used for outdoor sport, or which would prejudice the land's future use for sport in terms of quality or quantity of facilities, will not be permitted unless it can be clearly demonstrated that:</p> <ol style="list-style-type: none"> <li>1. it would provide open space and/or secure public access to private facilities in areas identified as deficient in open space, play space or sport and recreation facilities; and</li> <li>2. it would meet the priorities identified in the Council's Playing Pitch Strategy, Open Space Study, Active Wandsworth Strategy, Parks Management Strategy or the relevant All London Green Grid (ALGG) Area</li> </ol>	Comments noted.	LP56 (Now LP54)has been amended in response to this comment.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Framework. Lost playing field generally cannot be replaced by playing field that already exists – there must be additionality in order for the NPPF exceptions to be met.</p> <p>Lost playing field can also only potentially be justified as surplus to requirements by the Wandsworth Playing Pitch strategy, and not any of the other studies mentioned in this policy. For the avoidance of doubt, Sport England would strongly suggest that this policy is reworded in order to make this clear and in line with the NPPF requirements.</p> <p>This policy also states:</p> <p>B. Any proposal involving the loss of indoor sports facilities and recreation facilities will not be permitted unless it can be clearly demonstrated that:</p> <ol style="list-style-type: none"> <li>1. there is no current or future need or demand for the facility, either in its current use or for any alternative sports or recreation use; or</li> <li>2. replacement provision of an equivalent or better quantity and quality which supports any identified current and future need will be provided in an appropriate location.</li> </ol> <p>I am unclear as to the status of a current Built Facilities Strategy for Wandsworth Council, which would be required in order to assess point B1 of this policy. Without a robust and up to date assessment of indoor sports facilities, it is not possible to make a judgement as to current or future need or demand for the facility. I would be grateful if this could be clarified.</p> <p>With regard to paragraph C of LP56, I would suggest that the provision of new sports facilities should also be justified by either the Playing Pitch Strategy or a Built Facilities Strategy, as appropriate, in order to ensure that facilities are located appropriately in areas of strategic need. This will also help ensure that such facilities are sustainable. Sport England is supportive of the desire to maximise the multiple use of facilities and encourage co-location of services between sports providers. Sport England also welcomes the support for the provision of sports lighting where appropriate.</p>		
Mr Robert Arguile	Chair The Putney Society			350	Policy LP56	<p>LP56.A &amp; B Loss of indoor and outdoor sports pitches etc. It should be made clear that replacement after a new development has been completed is not acceptable. This could leave a community without a sports pitch for several years.</p>	<p>The conditions with regards when playing pitches will come forward as part of a development will be outlined in a site allocation if it is considered to be necessary or it will be for development management to assess with any proposal they consider. No changes to the Local Plan are considered necessary</p>	<p>No changes to the Local Plan are considered necessary.</p>
Clare Graham	Chair of Open Spaces Committee Battersea Society			500	Policy LP56	<p>Policy LP56 discusses Open Space, Sport and Recreation. The policies are clear in resisting the loss of facilities, but should say more about the route to improvements and even the unlocking of existing facilities. For example, C2 states the new facilities should: "maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities". This is an excellent objective. Shared use of school facilities has long been talked about, but measures need to be put in place to ensure that it happens.</p> <p>Similarly, point D says: "Public access to open space and sports and recreation facilities on private land will be supported, particularly in areas with an identified deficiency in open space." How? What measures are proposed to deliver such a change?</p> <p>More is required on new proposals (see point about mapping of sites for "sports cages" and basketball hoops etc.) Can land in housing estates (say expanses of parking or grassland, often with "no ball games" signs) be rationalised and intensified so allow more areas for play, as well as greater naturalisation and/or food production?</p> <p>Further measures to increase areas for Open Space, Sport and Recreation should be identified, e.g. by simplifying road infrastructure (removal of roundabouts, covering of underpasses), or exploring the use of roofs of buildings for recreation/school use/ public access gardens on tall buildings, as has been done in the City of London and other London boroughs.</p>	<p>The Council will support any proposals to increase public access to open space and sports and recreation facilities on private land. This policy is not proposing any such changes itself.</p> <p>The Playing Pitch Strategy will identify all provision in the borough including MUGAs and basketball courts and will look to identify where additional playing pitches can be created. The Open Space Study and Strategy will similarly identify areas for greater naturalisation and or food production.</p>	<p>No changes to the Local Plan are considered necessary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Julie McPhillips				973	Policy LP56	<p>Just to let you know I was born and lived in Wandsworth all my life. I am now 54 years old and have seen the changes, some good and some bad. I have lived through continued gentrification of our borough and have first hand evidence of people living in social housing moved out of the Winstanley estate on Falcon road. they were moved out of the run down and neglected buildings due to asbestos, or so they were told. They were assured they would be able to move back in but in fact these flats were turned into a private gated community. The families that lived there were sent away, never to return. I have concerns that this could happen again, as most of this reads as creating a middle class utopia.</p> <p>I am concerned that any piece of green space that is in the hands of the council at the moment will be covered in concrete and built on.</p> <p>On page 374 you say no to closing any open sport / recreation spaces and then at 21:24 you state that proposed developments on these sites will be assessed to see if they're suitable. All sounds a bit contradictory.</p>	It is unclear what section of page 374 if being referred to as it relates to biodiversity and not the protection of open spaces. Paragraph 21.24 relates to guidance from the NPPF and while the loss of open spaces and playing pitches are restricted and not within the objectives of the Local Plan there are methods that can be used in exceptional circumstances.	No changes to the Local Plan are considered necessary.
ms claire baldwin				1123	Policy LP56	When deliberating your 'Future Wandsworth' plans, please consider improving the provision of outdoor activities & grassroots sporting facilities as we have all been made acutely aware by the pandemic that outdoor exercise is crucial to the wellbeing of all members of our communities.	The Wandsworth Open Space Study/ Strategy, the Playing Pitch Strategy, and the Active Wandsworth Strategy all seek to identify and create more provision and encourage active and healthy lifestyles.	No changes to the Local Plan are considered necessary.
Michael Atkins	Senior Planning Officer Port of London Authority			1478	Policy LP56	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP 56: Open Space, Sport and Recreation.</p> <p>Support policy LP56 on the protection of existing facilities and encouragement of new, or improvements to existing sports facilities including for the maximisation of the multiple use of facilities, including for riverside sites.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
Stephen Knowles				1417	Policy LP56	LP56 There should be a requirement to maintain or increase the number of sports/pitches/facilities per head of population. Limiting the reduction is not enough	The Playing Pitch Strategy identifies if areas have a surplus or deficiency of playing pitches in the borough and provides a strategy to ensure the demand is being met.	No changes to the Local Plan are considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1579	Policy LP56	<p><b>LP56 Open Space, Sport and Recreation</b></p> <p>1. The conditions for allowing 'a proposal that would result in a loss of sports pitches' etc. in subclauses 1 and 2 seems to allow conversion of public facilities into private facilities with public access, which is actually a loss of 'commons' and should not be allowed. It is not clear whether these clauses are intended to allow the shifting of sports facilities from one location to another.</p> <p>B/C. The conversion of public open space or sports facilities into limited access paid entry and often paved sports facilities should be dealt with in one of these clauses and should be resisted.</p>	Paragraph 21.20 sets out the conditions, according to national policy and guidance, where existing open spaces, sports and recreational buildings and land, including playing fields can be built on.	No changes to the Local Plan are considered necessary.
Mr Michael Priaulx	Swifts Local Network: Swifts & Planning Group			278	Policy LP57	<p>The reference in LP57 Biodiversity clause B2 to biodiversity features is welcome, but at present this doesn't reflect national and London guidance to make reference to artificial nesting features such as swift bricks. This is important because the national biodiversity net gain methodology does not give any value to existing populations of birds using buildings, nor to provision of nesting sites to cavity-nesting birds, both especially crucial in urban areas with many species such as swifts, sparrows and starlings now endangered.</p> <p>Therefore please amend the first sentence of LP57 Biodiversity clause B2 as follows:</p> <p><i>"The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings <b>such as swift</b></i></p>	<p>Swifts are protected in the Wandsworth Biodiversity Strategy.</p> <p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p> <p>Details about this would be captured in the Biodiversity Strategy for Wandsworth which has been adopted or the Biodiversity Action Plan for the borough is forthcoming.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p><b>bricks, bat boxes, hedgehog highways, and use of Sustainable Drainage Systems where appropriate."</b></p> <p>This is based on the following policies:</p> <p>National Planning Policy Guidance (NPPG, 2019) states: "...relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat" (Natural Environment, Paragraph 023, Reference ID: 8-023-20190721).</p> <p>Integral nest bricks are preferable to external boxes as they last the lifetime of the building, have no maintenance requirements, have better temperature regulation with future climate change in mind, and are aesthetically integrated with the building design.</p> <p>Note that swift bricks are used by a wide range of small birds including red-listed house sparrows, as set out in the CIEEM In Practice article (June 2019): <a href="https://cieem.net/resource/the-swift-a-bird-you-need-to-help/">https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</a></p> <p>London Plan (Publication issue, December 2020) states: "Policy G6 Biodiversity and access to nature... B: Boroughs, in developing Development Plans, should: ... 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context" (page 362).</p> <p>We highlight that recent updates to Local Plans by Bexley, Islington, Merton, and other London boroughs, have made specific references to swift bricks in this context.</p> <p>In addition, the Living With Beauty report by the government's Building Better Building Beautiful Commission (30/01/20) recommends: "Bricks for bees and birds in new build homes" (Policy Proposition 33, page 110).</p> <p>Therefore reference to bee bricks could also be added.</p>		
Ms Susan Jones				239	Policy LP57	When new buildings are being erected, a Council policy that swift nesting boxes should be included as a matter of course, would be a great step in helping to stop the dramatic decline in swift numbers. The Friends of Wandsworth Park are currently buying and installing swift nesting boxes in certain areas of SW15, having been successful in their application to the Wandsworth Grant Fund.	Comments noted. Details about this would be captured in the Biodiversity Strategy for Wandsworth which has been adopted or the Biodiversity Action Plan for the borough is forthcoming.	No changes to the Local Plan are considered necessary.
Mrs Louise Cole	Representative Wimbledon Swift Group			270	Policy LP57	<p>Please include:</p> <p>The built environment presents opportunities to create new habitat through inclusion of appropriately located integrated universal swift bricks into the fabric of new builds. This intervention will provide nesting and roosting habitat for a range of urban specialist birds, including swifts and sparrows, and also garden birds. This practice will be required and expected, so as to maximise biodiversity net gain in construction work. Existing swift nest sites should be protected from destruction and building work should be restricted to swifts' non-breeding months at sites where swifts already nest.</p> <p><u>Justification:</u></p> <p>Swift numbers are in severe decline across the UK, and are in need of urgent conservation action. Swifts depend on buildings for their nest sites, ie, small cavities in roofs and walls. Swifts return to their chosen nest site each breeding season and have great difficulty adapting to the disappearance of their own nest site. Swifts are losing nest sites due to renovation work, demolition and swift-unfriendly modern building practices. Loss of nest sites is thought to be a major reason for swifts' decline. To survive in the UK, swifts need new nest spaces to be built into new buildings on a widespread and routine basis. Existing swifts' nests need to be fully protected from</p>	<p>Swifts are protected in the Wandsworth Biodiversity Strategy.</p> <p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p> <p>Details about this would be captured in the Biodiversity Strategy for Wandsworth which has been adopted or the Biodiversity Action Plan for the borough is forthcoming.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>interference and destruction. They should be registered on the RSPB Swift Mapper.</p> <p>Provision of new nest sites in buildings complies with:</p> <p><b>NPPG:</b> <a href="https://www.gov.uk/guidance/natural-environment">https://www.gov.uk/guidance/natural-environment</a> Paragraph: 023 Reference ID: 8-023-20190721</p> <p><b>Publication London Plan</b>, December 2020, Policy G6 <u>Biodiversity and Access to Nature</u>:</p> <p>B: Boroughs, in developing Development Plans, should: ... (4) 'Seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context'(page 362).</p> <p><a href="https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/publication-london-plan">https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/publication-london-plan</a></p>		
Mr Robert Arguile	Chair The Putney Society			354	Policy LP57	<p>There's no reference here to the Biodiversity Strategy (and later Action Plan) surely it is relevant?</p> <p>LP57.B.2 We welcome encouraging the use of Sustainable Drainage Systems (SuDS)</p> <p>LP57.B.5 How will they ensure that soft landscaping is encouraged in private gardens?</p> <p>LP57.C This is a fudge - a gift to developers and their "expert" arboriculturalists and other advisors who have more resources than the Council's (or Enable's) tree officers and environmentalists. <u>Species are either protected or they are not.</u></p>	<p>LP5 Residential Extensions and Alterations supports the use of hardstanding to be constructed from permeable materials for any alteration or extension of front gardens.</p>	<p>Reference to the Biodiversity Strategy and the forthcoming Biodiversity Action Plan have been added to the supporting text.</p> <p>Part C has been amended to provide greater protection.</p>
Lois Davis	Co-ordinator Wandsworth Green Party			474	Policy LP57	<p>There seems to be little mention of, or policy to deal with, urban rewilding such as a commitment to maintaining existing green edges. LP57 seriously weakens ambitions to support biodiversity in point C by allowing development which does not meet the boroughs Biodiversity conditions "where it has been demonstrated that there is no alternative site layout" and where "the benefits of the development outweigh the harm". Further the permitting of off-site to mitigate biodiversity harm should not be allowed. LP57 also pays insufficient attention to wildlife corridors which exist on pavements.</p> <p>We also note that the Council's own street lighting is a major source of light pollution and needs consideration with respect to urban wildlife and human comfort. The replacement of low pressure sodium lighting by LED lighting has raised the brightness of streets at night time from a perfectly adequate level to one that seems unnecessarily high. Other boroughs (e.g. Merton) have installed LED lights which can be reduced or dimmed during certain night time hours.</p>	<p>The Local Plan promotes greater biodiversity through LP57 Biodiversity and requires new developments to enhance biodiversity but does not stipulate that should take the form of rewilding. The Biodiversity Strategy and Biodiversity Action Plan will provide greater guidance as to where and how this would be viable.</p> <p>As part of the Council's ambitions to tackle climate change LED lighting has begun to be installed in areas such as Roehampton. The impact on biodiversity has been considered as part of these changes.</p>	<p>Part C has been amended to provide greater protection.</p>
Wilkinson				431	Policy LP57	<p>I am concerned by the declining number of swifts in the area with nesting site loss being the key reason and am working with others to install nest boxes. I would like to see the inclusion of swift bricks (nesting sites) included in new developments.</p>	<p>Details about this would be captured in the Biodiversity Strategy for Wandsworth which has been adopted or the Biodiversity Action Plan for the borough is forthcoming.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Clare Graham	Chair of Open Spaces Committee Battersea Society			504	Policy LP57	<p>LP57. Biodiversity policy,</p> <p>B2. We recommend the removal of the words "where appropriate." It is not clear to which clause "where appropriate" applies, but all development sites should attempt to incorporate the principles that are mentioned.</p>	<p>The clause "where appropriate" applies to Sustainable Urban Drainage systems. The policy requires developers to explain as part of an application that the development will not have an adverse impact.</p>	<p>No changes to the Local Plan are considered necessary.</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						C. We recommend that there should be a presumption against any development with the potential for adverse impact, requiring the developer to make the case.		
Ms Bridget Fox	Regional External Affairs Officer (South East)  The Woodland Trust			597	Policy LP57	<p>The Woodland Trust welcomes policy to protect and enhance biodiversity, but would like to see this policy wording strengthened if it is to fit with the Council's aspiration to be the greenest inner London borough.</p> <p>We support setting a greater than 10% target for net gain. By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice.</p> <p>We propose the following changes:</p> <p>A: remove the words "where appropriate"</p> <p>B.2: after the words "net gain" add "of at least 10 per cent".</p> <p>C: delete and replace with "Development resulting in the loss or deterioration of irreplaceable habitats will not be permitted, unless there are wholly exceptional reasons. Where it is deemed that there is going to be unavoidable residual damage or loss, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat."</p>	<p>The current wording for Clause A is important as otherwise it would require all developments to secure the enhancement of the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites.</p> <p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p>	Part C has been amended to provide greater protection.
ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1003	Policy LP57	<p>We note and welcome the preparation of a new Biodiversity Strategy for the Borough (published after the Local Plan consultation started) but again, there is no reference within the biodiversity strategy to any existing or emerging Green Infrastructure strategy when, clearly, the two should be closely related given the biodiversity importance of the Borough's multifunctional green infrastructure and the opportunity offered by the WESS for more holistic thinking on the environment.</p> <p>Our views on the key locations and issues a more place-specific and joined-up approach to green infrastructure might consider for Tooting are set out in detail in our neighbourhood[1]specific comments below.</p>	<p>The Biodiversity Strategy has been adopted and a Biodiversity Action Plan is forthcoming.</p> <p>Wandsworth intends to prepare its own Urban Greening Strategy to support Urban Greening Factor and will provide guidance on green infrastructure in the borough.</p>	No changes to the Local Plan are considered necessary.
	Natural England			1356	Policy LP57	<p>Please see attachment Biodiversity Net Gain Development proposals should protect and enhance the nature conservation, or geological interest, of nationally important wildlife sites. This will be achieved by refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations. There is a strong likelihood that mandatory net gain will come forward soon. This would mean that all development would need to provide net gain. It is up to the Council to decide whether they want to futureproof their Local Plan to incorporate mandatory net gain for all developments now, or update as appropriate when mandatory net gain officially comes through. We note that this is mentioned in paragraph 21.32, but we would advise that this could go further to allow provision for the development of a specific SPD on net gain that will outline in detail, Council expectations of developers and mechanisms for delivery. Natural England would be happy to engage with the Council on implementing net gain into local policy. Biodiversity Net Gain is strongly supported by the National Planning Policy Framework (NPPF) and features prominently in the governments 25 Year Environment Plan. We therefore recommend policy inclusion of biodiversity net gain and the use of an approach based on the Defra biodiversity metric. Natural England has released the Defra Biodiversity Metric 2.0, while Metric 3.0 is due to be published in April 2021. Development should seek to use the most up to date version of the metric available. The new metric is accompanied with detailed guidance and a tool to apply the metric. Natural England encourages the incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain. The Plan should set out a strategic approach, planning positively for the creation,</p>	<p>The Biodiversity Strategy has been adopted and a Biodiversity Action Plan is forthcoming.</p> <p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p> <p>Wandsworth intends to prepare its own Urban Greening Strategy to support Urban Greening Factor and will provide guidance on green infrastructure in the borough.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure. We support the production of a Green Infrastructure Strategy that would plan for GI on a more strategic level. Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. Plans should set out the approach to delivering net gains for 2 The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure. Natural England would like to draw your attention to Annex A which contains useful resources as well as advice and benefits of embedding biodiversity net gain into the Local Plan.		
	Natural England			1357	Policy LP57	Richmond Park SAC and Wimbledon Common SAC  The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites <sup>1</sup> . Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites <sup>1</sup> International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites <sup>1</sup> . National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites). (Special Areas of Conservation and Special Protect Areas) and Ramsar sites <sup>2</sup> should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced. The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. As both Richmond Park SAC and Wimbledon Common SAC fall either partly within, or adjacent to the borough, it may be necessary for strategic and cross-boundary approaches to ensure that there is no adverse effect on the integrity of internationally designated sites. Natural England has reviewed a draft HRA screening for the Wandsworth Local Plan, and was largely in agreement with the conclusions that were drawn. Natural England is pleased to see that Richmond Park SAC and Wimbledon Common SAC have been considered in the Local Plan. We welcome that Natural Englands services have been highlighted for site allocations in close proximity to the SACs and look forward to working alongside the LPA and developers to ensure that appropriate consideration is given to stag beetle habitats during the development process. However, we note that for site allocation Roehampton Vale (OUT3), that while the proximity to Richmond Park SAC is considered, Wimbledon Common SAC, which is adjacent to the site, was not mentioned. We believe it would be pertinent to adjust the wording to reflect that both designated sites will be considered.	Comments noted. LP57 Biodiversity provides protection and seeks enhancement for the borough's priority species, priority habitats and protected sites as well as the connectivity between such sites. This includes but is not limited to Special Areas of Conservation, Sites of Special Scientific Interest, Local Nature Reserves, Local Wildlife Sites.	OUT3 Roehampton Vale has been removed from the Local Plan as a site allocation.
Michael Atkins	Senior Planning Officer Port of London Authority			1479	Policy LP57	<b>See the attachment on comment 1441 the representation for context</b>  - Policy LP 57: Biodiversity.  In principle support policy LP 57, specifically parts B3 and B4 on the need for development proposals to ensure that new biodiversity features or habitats connect to the existing ecological and green and blue infrastructure networks and complement surrounding habitats.	Comments noted.	No changes to the Local Plan are considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1582	Policy LP57	<b>LP57 Biodiversity</b>  1. To make it absolutely clear, 'Development proposals. . .' should read 'All development proposals. . .'; the clause otherwise sets out admirable aspirations. Will the Council Planning Department	The Biodiversity Strategy has been adopted and a Biodiversity Action Plan is forthcoming.	Part C has been amended to provide greater protection.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>employ sufficient specialist expertise to deal with these issues effectively?</p> <p>Having stated admirable aspirations in clause B, this clause provides a strong let-out opportunity for developers. Ecological requirements should not be tradable and development that has an adverse impact on priority spaces or priority habitat(s) should simply not be allowed.</p>		
Rachel Holmes	Planning Advisor Environment Agency			1624	Policy LP57	<p>See attachments on 1615 for more detail</p> <p>Biodiversity and place based policy</p> <p>Whilst Biodiversity and river related policies have been included we believe that some of the place based policy should feature specific requirements to make it clear what the expectations are for redevelopment. This is because Biodiversity Net Gain requirements and set back requirements may mean a significant change to the current space for the river at the site.</p>	<p>The Biodiversity Strategy has been adopted and a Biodiversity Action Plan is forthcoming.</p> <p>LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements.</p>	No changes to the Local Plan are considered necessary.
Mr Robert Arguile	Chair The Putney Society			358	Policy LP58	<p>This whole policy, while welcome, needs strengthening.</p> <p>The default position should be the retention and protection of existing trees with planning applications providing for new trees and greenery. New trees should be suitable for the location in terms of height and root spread (as too many trees have been planted where there is insufficient space for their roots to grow. For example, above underground car parks.</p> <p>We have tried to understand "Capital Asset Value for Amenity Trees" and as far as we can see it does not include any metrics for carbon capture. If trees really have to be removed then they should be replaced by a totality of trees that provide the same potential for carbon capture.</p> <p>The Trees and Woodland section is dependent on "judgements". Who makes these judgements – the developer's highly resourced arboriculturalists or the overstretched Enable tree officers?</p> <p>Who defines whether or not a tree has an "amenity value". Who defines whether a tree is dying or dangerous? Under very similar wording all the relatively young trees bordering the old Homebase and B&amp;Q sites were designated as of poor quality and thus removal was permitted.</p>	<p>The Policy does require the retention and protection of existing trees and landscape features and planning applications are expected where appropriate to provide new trees, shrubs and other vegetation of landscape significance. CAVAT was developed by the London Tree Officers Association and is the method of assessment the Council have chosen for calculating the monetary value of an existing tree.</p> <p>The Tree Officers will be required to make judgements on whether a tree has amenity value and whether it is dying or dangerous.</p> <p>The CAVAT system does not consider carbon capture.</p> <p>No changes to the Local Plan are considered necessary.</p>	No changes to the Local Plan are considered necessary.
Clare Graham	Chair of Open Spaces Committee Battersea Society			507	Policy LP58	<p>LP58. Tree management. This section could be shortened by setting out clear objectives and referring to measures in a separate Tree Management Strategy.</p> <p>1. Recommend removal of "Where appropriate". There is a requirement for net gain to biodiversity.</p> <p>C8. Again, "where appropriate" should be deleted and replaced with "species that are robust against climate change and pollution could also be appropriate and those that mitigate against poor air quality will also be supported".</p> <p>E is particularly weak; there should be reference to GLA guidance, native planting, value of hedges/hedgerow, water, etc. Full explanations of landscaping strategies should be included in design and access statements within any design process. Presentations to the Design Review Panels on major schemes should include landscape strategies.</p>	<p>The Council is preparing a Tree Strategy that will provide further guidance alongside the new Biodiversity Strategy.</p> <p>The requirement for Biodiversity Net Gain is set out in LP57 Biodiversity and is not required to be repeated here.</p> <p>The Council finds that the policy is sufficiently robust and flexible to protect and enhance trees while also allowing for development to come forward.</p>	Supporting text has been amended to provide guidance about replacement trees and to allow for site specific circumstances
Ms Bridget Fox	Regional External Affairs Officer (South East) The Woodland Trust			593	Policy LP58	<p>The Woodland Trust welcomes this policy. In particular, we strongly support the requirement for retention and protection of existing trees and landscape features, including veteran trees; the incorporation of new trees, shrubs and other vegetation of landscape significance; and ensuring that development protects, respects, contributes to and enhances trees and landscapes.</p> <p>We welcome the policy that existing trees, green spaces, and hedges, should be integrated, protected and enhanced in new developments. Integrating</p>	<p>The Council finds that the policy is sufficiently robust and flexible to protect and enhance trees while also allowing for development to come forward.</p>	Supporting text has been amended to provide guidance about replacement trees and to allow for site specific circumstances



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019).</p> <p>We recommend strengthening the policy further as follows.</p> <p>B We recommend setting a target for canopy cover in new developments of a least 30%, to be delivered by a mixture of tree retention, tree replacement and new planting.</p> <p>C.5 We recommend a robust policy requiring greater than 1:1 replacement where trees are unavoidably lost, setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on <i>Local Authority Tree Strategies</i> (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>C.6 We would recommend adding a minimum 50m buffer for ancient woodland.</p> <p>C.8 We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience.</p>		
Mr Richard Fox				607	Policy LP58	<p>A 'The Council will require the retention and protection of existing trees'. ABSOLUTELY IT SHOULD. In May 2017, Wandsworth Tree Wardens submitted a document asking that the council's new Tree Strategy include 'a presumption that all trees on a development site remain'. Developers should work from this position as a starting point.</p> <p>WE look forward to the new Tree Strategy to be approved in June including these provisions and enshrining them in planning law</p> <p>B absolutely agree</p> <p>C1 'resist the loss of trees' - ABSOLUTELY. The presumption should be that NO trees should be felled without VERY good cause and that replacements should be not just one for one which is inadequate. Encouraged to see the CAVAT system being introduced</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Frank Burgess				840	Policy LP58	<p>Also I note in the July issue of Brighside that leader Ravi Govindia has pledged to make this this the greenest borough. How is felling mature trees (as is happening now on Winstanley estate) consistent with that vision? And can we be expected to believe that these latest protestations of worthy intent are anything more than empty pr rhetoric?</p>	The Council's aim to become London's greenest inner borough will be met with new tree planting and appropriate replacement of any tree that is felled such as those in Winstanley. The Council is also producing a Tree Strategy that will include an extensive tree planting programme to help achieve the vision.	No changes to the Local Plan are considered necessary.
Julie McPhillips				977	Policy LP58	<p>Tree retention and protection. Here the proposal claims to protect trees in the borough but at the moment there is a 200 year old tree about to be cut down in the York road estate as it is in the way of electrical cabling. Could the electrical cables not be put underground. 50 mature Horse Chestnut trees were cut down on Chestnut avenue in Tooting a few years ago even though more than one independent surveyor stated that most were completely safe. It worries me that Wandsworth council say they want to keep trees but instead think nothing of cutting them down if they are in their way.</p>	The Wandsworth Tree Officers are responsible for these assessments.	No changes to the Local Plan are considered necessary.
H Monger	Director London Historic Parks and Gardens Trust			1244	Policy LP58	<p>LP58 Tree management and Landscaping</p> <p>In particular Clause E.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1327	Policy LP58	<p>Trees should be preserved wherever possible and if they need to be felled then they should be replaced.</p>	Comment noted.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Julia Raeburn	Sutherland Grove Conservation Area Residents Association			1406	Policy LP58	<p><b>LP58 Tree management &amp; Landscaping</b></p> <p>There needs to be a policy of not granting PP for the felling of trees in our CA unless there is an over-riding reason, or the tree is seriously-diseased. PAs to fell trees should be subject to neighbour-consultation as well as Planning Dept. At present neighbours are not consulted. The needs of bio-diversity are paramount and new 'replacement' trees take years to build up the species supported by an old tree.</p> <p>There are a number of fruit trees in our rear gardens that have existed since the building of these houses.</p> <p>Replacement street trees should reflect the traditional trees of that street, eg Skeena Hill&amp; elsewhere always had pink flowering cherries. They now appear to be replaced with whatever is available &amp; there is no consistency.</p> <p>The Sutherland Grove plane trees were a noted feature of the CA, &amp; replacement plane trees should have always been planted to retain its integrity. This has not always been the case unfortunately, but SGCARA strongly expects that the integrity of the plane-tree avenue will be respected in future &amp; that they will not be over-pruned as at present.</p>	<p>All trees within a conversation area are granted the same protections are TPOs.</p> <p>The Development Management team would typically consult adjoining neighbours if a tree was to be felled and they would consider consulting more residents depending on the size of the tree. A site and a press notice would be displayed if the proposal was in a conservation area or a TPO was to be felled.</p> <p>The forthcoming Tree Strategy and Biodiversity Strategy will provide guidance on the proper replacement of trees with regards to biodiversity.</p>	Supporting text has been amended to provide guidance about replacement trees and to allow for site specific circumstances
Stephen Knowles				1419	Policy LP58	LP58 B - New trees in major development must include large native trees that will become the veteran trees of the future	The forthcoming Tree Strategy will provide further guidance on the appropriate new trees.	No changes to the Local Plan are considered necessary.
Diana McCann	Boroughs Coordinator The Blue Green Economy			1437	Policy LP58	<p>LP58 Tree Management and Landscaping – Point 8</p> <p>There must be consideration of the tree pit design and potential water supply (e.g. direct drainage off street) to promote healthy trees. It should be noted that poor design leads to stunted trees that may require replacement should they fail and negative carbon impact as a result.</p> <p>Another key consideration for developments is for the use of trees to shade and, as a result, reduce cooling / energy requirements. Consideration of the wind environment is also required, such as reducing windiness in the pedestrian zone for comfort and safety as well as increasing windiness for pollution dispersion purposes.</p>	The forthcoming Tree Strategy will provide further guidance on the appropriate new trees.	No changes to the Local Plan are considered necessary.
Cyril Richert	Clapham Junction Action Group			1683	Policy LP58	<p><b>See attachment on comment 1649 for associated graphs, pictures, tables and footnotes.</b></p> <p>LP58 Tree Management and Landscaping</p> <p>consent for works to protected trees (TPOs and trees in Conservation Areas) will only be granted where; a. proposed works of pruning are in accordance with good arboricultural practice, or b. proposals for felling are properly justified through a detailed arboricultural and/or structural engineer's report; and c. adequate replacement planting is proposed.</p> <p>A 2018 planning application<sup>54</sup> made a mockery of the Tree Protected Orders issued by Wandsworth Council. The Council's tree service wrote: "The loss of the majority of the TPO London planes (16 of 21) would result in a substantial loss of public amenity." It was ignored by the planners and justification given such as:</p> <p>"Whilst it is regrettable that the proposal would result in a loss of trees including trees covered by a TPO, an appropriate landscaping scheme for the site as well as adequate tree planting will be secured by conditions and the S106."</p> <p>In the Local Engagement event organised by the Council, opinions were largely shared such as:</p>	<p>Issues relating to existing or previous planning applications are outside the remit of the Local Plan consultation.</p> <p>The consultation event in question was considered as part of the preparation of the policies for the Local Plan. Wandsworth is preparing a Tree Strategy to help guide how trees should be replaced. The Council does in this policy require the retention and protection of existing trees and landscape features.</p> <p>LP20 New Open Space and LP59 Urban Greening Factor set out how Wandsworth intends to create new green and open spaces as well as green features. LP51 Sustainable Transport encourages the provision of parklets.</p> <p>Providing developers with the option to provide a financial contribution in lieu of providing environmental benefits on site is deemed necessary by the Council to ensure there is enough flexibility for applicants and the best possible environmental outcome is created rather than creating environmental assets in inappropriate areas.</p> <p>It is not within the remit of the Local Plan to consider the planning judgements of the Development Management Team and the Councillors.</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<ol style="list-style-type: none"> <li>1. There should be a real tree strategy so the value of trees is properly assessed, rather than allowing mature trees to be replaced with token saplings (i.e., a mature tree could be worth 5 smaller trees).</li> <li>2. There should be a presumption that no tree should be cut down and it should be up to the developers to challenge the decision and replace with the same value if necessary.</li> <li>3. The plan should favour refurbishment instead of knocking down and rebuilding (even if the latter is cheaper).</li> <li>4. A preference for environmental compensation or larger new developments to be on site, or failing that as close by as possible – there was good support for creation of ‘pocket parks’ and small local green spaces</li> <li>5. ‘Offset’ of environmental impact – the option paying money for something to be done elsewhere, far away – must be avoided as this is seen as too easy a get out for developers. There were fears that some of the measures offered by developers were just ‘greenwash’, and weren’t necessarily followed through with.</li> <li>6. Concerns about the tendency to accept that “wider benefits” outweigh harm</li> <li>7. Construction on local authority land – where the Council has more direct control – should be seen as an example for all other developments</li> </ol> <p>We fail to see those concerns expressed in the Local plan. For example, LP58 says “adequate replacement planting is proposed” or “require, where practicable, an appropriate replacement” which fall short of supporting any strong views expressed during the Local Engagement event.</p> <p>Current event in York Gardens where developers (including the Council) are adamant to fell a 100-years-old tree for the purpose of avoiding the redirection of electric cables necessary to their development is the latest illustration of the issue.</p>		
Terence Brown	Coordinator Wandsworth Friends of the Earth			1583	Policy LP58	<p><b>LP58 Tree Management and Landscaping</b></p> <ol style="list-style-type: none"> <li>1. A strong opening requirement that seems to get watered down in subsequent clauses.</li> <li>2. This clause should be for all development proposals and so ‘Where appropriate’ should be deleted.</li> <li>3. This is a long clause that qualifies or amplifies the aspirations in A and B: the frequently used term ‘resist’ seems somehow to suggest an openness to persuasion, perhaps ‘oppose’ would be more appropriate?</li> <li>4. Built in open-ended let out clause ‘. . . or the tree has little or no amenity value and it is not possible to retain the tree as part of the development. . .’ should be omitted. All trees have amenity value and especially mature ones and in any development proposal, the onus should be on the developer to demonstrate that (for a development that is in principle acceptable on a given site) there is no possibility of retaining all existing landscape features and to demonstrate that any that have to be removed from particular locations are replaced on site with equivalent features.</li> <li>5. This clause seems to make contradictory requirements. The term ‘where practicable’ weakens the requirement and shouldn’t be necessary if clause C1 has been effectively worded.</li> </ol> <ol style="list-style-type: none"> <li>1. If the main thrust of this section is that all trees are presumed to be protected, then the inclusion of this clause seems redundant and opens up the opportunity for a developer to fell trees before a planning submission has been made on the basis that they are not</li> </ol>	<p>Not all planning applications require new trees which is why “where applicable” has been included in part A.</p> <p>The use of resist is considered sufficiently strong for the Council. The Council’s Tree Officers will assess whether a tree has amenity value. It is the responsibility of the applicant to demonstrate that the tree or landscape feature has to be removed and then the responsibility of the development management officer and the tree officers to assess this claim. Part C(5) does require appropriate replacement of any tree loss.</p> <p>The use of “where practical” in part C(5) is to ensure that trees are not forced onto sites where it would not be best for the tree’s health.</p> <p>Part C(4) explains where TPOs or trees within conservation areas can be worked on or felled and this differs from how other trees are considered.</p> <p>LP5 Residential Extensions and Alterations part A(9) requires hardstanding to be constructed from permeable materials for front gardens. LP59 Urban Greening Factor include permeable surfaces as a greening feature</p>	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>subject to a TPO. This needs to be clarified by a stronger statement about the conservation of all trees as the starting point.</p> <p><b>LP58 Landscape</b></p> <p>Add in a requirement here, that any paved areas are to be permeable. Also, developers need to be required to indicate what landscape maintenance provisions will be made and these to be capable of enforcement.</p>		
Mr Robert Arguile	Chair The Putney Society			360	Policy LP59	<p>All development proposals should contribute to the greening of Wandsworth and include permeable surfaces as much as possible. This is as important for plans at a domestic level as it is for major developments because of the high proportion of land already in residential use.</p> <p>LP59.B.3 Planting needs to be chosen to specifically encourage biodiversity, especially in terms of attracting a range of insects amongst other factors. Hawthorn, blackthorn, Rowan and others are known to support wide range of insects.</p>	Permeable paving is a greening feature that can be used by applicants. LP5 Residential Extensions and Alterations requires hardstanding in front gardens to be constructed of permeable materials for any extensions and alterations. Greening features are outlined in the London Plan and they have considered climate change and biodiversity when providing each feature with a score.	No changes to the Local Plan are considered necessary.
Lois Davis	Co-ordinator Wandsworth Green Party			472	Policy LP59	<p>LP59A should go further by including urban blue-greening Integrated Water Resource Management with Rain Water Harvesting and Blue Green Technologies as a part of the fundamental element of site and building design.</p> <p>LP59 B. 2. should also include a requirement for permeable pavements, porous roads surfaces and permeable tracks for cars. Stricter controls on pavement cross-overs would also be welcome.</p>	<p>The supporting text explains that the UGF in use by Wandsworth is based on the London Plan guidance and that a specific Wandsworth UGF will be created.</p> <p>The guidance from the London Plan is considered sufficient in this instance. The policy does require developments to include as much permeable surfacing as possible.</p>	No changes to the Local Plan are considered necessary.
Mr Richard Fox				611	Policy LP59	C is a cop out. It means rich developers can evade the regulations. They should be forced to comply like everyone else. If meeting the thresholds isn't feasible the development should be thrown out	Only in exceptional circumstances could a development avoid having to include an urban greening factor and with the numerous greening features that can be used the Council is content with the wording which allows for some flexibility.	No changes to the Local Plan are considered necessary.
Mr Richard Fox				612	Policy LP59	C is a cop out. It means rich developers can evade the regulations. They should be forced to comply like everyone else. If meeting the thresholds isn't feasible the development should be thrown out	Only in exceptional circumstances could a development avoid having to include an urban greening factor and with the numerous greening features that can be used the Council is content with the wording which allows for some flexibility.	No changes to the Local Plan are considered necessary.
Hassan Ahmed Hassan Ahmed	GLA			1120	Policy LP59	<p><b>Urban greening</b></p> <p>The Mayor welcomes that Wandsworth are proposing to follow the urban greening factor approach as set out in Policy G5 of the PLP. The borough should note that the urban greening factors set out in Policy G5 should only be used in the interim until urban greening factors, tailored to local circumstances have been established and this should be made clear in draft</p> <p>Policy LP59.</p>	The supporting text explains that the UGF in use by Wandsworth is based on the London Plan guidance and that a specific Wandsworth UGF will be created.	No changes to the Local Plan are considered necessary.
Stephen Knowles				1418	Policy LP59	<p>LP59 C - For all development over a 1/4 acre there should be no exception.</p> <p>As you can see most of my comments concern ensuring that all residents have access to high quality open spaces and natural environments, that such environments enhance biodiversity and that the area of such environment</p>	Only in exceptional circumstances could a development avoid having to include an urban greening factor and with the numerous greening features that can be used the Council is content with the wording which allows for some flexibility.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>increases as the population if the borough increases and the hidden habitat loss continues and gardens and become paved and astro-turfed and small pieces of industrial and scrub land are developed.</p> <p>Targets for greening, large trees, biodiversity and public space should be looking to increase the area on a per capita basis. Trees, green space and open space has been lost in recent decades and the population has grown by over 20% in the last 20 years alone.</p> <p>The pandemic has shown us all the value of nature as well as highlighting just how many people use the boroughs public spaces. It is important we look to improve the quality of peoples lives and help the environment recover rather than simply limiting the destruction or ding the bare minimum.</p>		
Diana McCann	Boroughs Coordinator The Blue Green Economy			1438	Policy LP59	<p>LP59 Urban Greening Factor</p> <p>Point A. All development proposals should contribute to the greening of Wandsworth borough by including urban greening (Integrated Water Resource Management with Blue Green Technologies) as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.</p> <p>and</p> <p>Point B2. incorporate as much soft landscaping and porous / permeable pavement and road surfaces as possible. In consideration of their wider benefits, these can be included at a reduced cost to traditional surfaces.</p>	<p>The supporting text explains that the UGF in use by Wandsworth is based on the London Plan guidance and that a specific Wandsworth UGF will be created.</p> <p>The Council is not in a position to reduce the cost of permeable surfaces for new developments.</p>	No changes to the Local Plan are considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1584	Policy LP59	<p><b>LP59 Urban Greening Factor</b></p> <p>1. Does 'should' imply 'shall', i.e. an imperative rather than an aspiration? It should.</p> <p>The placing of the rider 'in exceptional circumstances' is ambiguous here and we would recommend rewording the clause as follows: 'In exceptional circumstances, if it can be clearly demonstrated that meeting the thresholds would not be feasible, a financial contribution may be acceptable. . .'</p>	Comments noted.	Clause C has been amended in response to this comment.
Emma Broadbent	London Rivers Officer South East Rivers Trust			265	Policy LP60	<p>This comment may also be of relevance to the <b>Policy LP60: River Corridors.</b></p> <p>1. We welcome aims to protect and enhance watercourses within the borough. As mentioned in our response to the Site Allocations section of the Local Plan, this policy could be further strengthened by the inclusion of a requirement for developments along the Wandle to support the delivery of the Wandle Catchment Plan.</p> <p>The Wandle Catchment Plan has been compiled to provide a holistic strategy for restoring south London's River Wandle to its former glory as one of the world's most famous chalk streams. Chalk streams like the Wandle are a globally-rare and precious part of our cultural heritage, but many now suffer from human modification and other pressures including over-abstraction of water, sources of pollution including roads and sewage treatment works, and the spread of industry and urban areas.</p> <p>In recognition of these pressures on the Wandle, a wide-ranging partnership including the Environment Agency, local councils, the South East Rivers</p>	<p>Proposals for development on the riverside will be subject to LP12 Water and Flooding that expects applicants to consider river frontages. Which is considered to be in general accordance with the Wandle Catchment Plan.</p>	Policy LP60 (Now LP58) has been amended to reiterate the requirements for set backs from LP12 Water and Flooding

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Trust/Wandle Trust, London Wildlife Trust, local anglers, residents and Wandle Valley stakeholders have come together to create the Wandle Catchment Plan which outlines targets and actions that are required to realise improvements to the ecological function of the river.</p> <p>Including a requirement for developers to support the delivery of the Wandle Catchment plan will ensure that maximum benefit for the river is achieved and that developments consider the whole water environment, including potential improvements to water quality, flood risk, resilience to drought, biodiversity and community engagement.</p> <p>We recommend that this policy includes a minimum distance required between any development and the riverbank. Ideally this should be 30m but where this is not feasible a distance of at least 10m should be required. This should also apply to the creation or improvement of riverside walks, taking into account the importance of the zone of land bordering the River Wandle (the riparian zone), without which the biodiversity potential of the river will be limited.</p>		
Mr Robert Arguile	Chair The Putney Society			389	Policy LP60	<p>A. <i>'The natural, historic and built environment of the River Thames corridor and watercourses within the borough will be protected and, where appropriate, enhanced to ensure the achievement of a high quality and accessible environment including through the provision of connections to existing and new communities and to maximise biodiversity benefits.'</i> Supported.</p> <p>B. <i>'The biodiversity value of the borough's blue infrastructure assets will be protected and enhanced including that of the River Thames, River Wandle and Beverley Brook'.</i> Supported. Development needs to leave space needs for natural banks.</p> <p>C. <i>'Measures to protect and enhance rivers as a valuable resource for wildlife and biodiversity, including wildlife corridors and green chains, will be supported.'</i> Supported. Add 'Beverley Brook'. More attention should be paid to the short section of Beverly Brook that runs by Putney Common and emerges into the Thames (noting that it is the borough boundary). The barrier (weir?) at the mouth of the river should be modified to allow the passage of fish and other wildlife. This is an important water habitat and seems to have been overlooked in the plan. Kingfishers have been observed along this short stretch.</p> <p>D. <i>'Existing river infrastructure that provides access to the river and the foreshore, such as piers, jetties, drawdocks, slipways, steps and stairs will be protected. New and enhanced infrastructure, including piers for riverbuses and the provision of enhanced services, will be supported.'</i> Piers need to be kept free of permanently moored vessels which obstruct views of the river - see comment on LP 62 below</p> <p>E. <i>'Development which encroaches onto the river foreshore will not be supported. Opportunities will be taken .. to create new habitats and reduce flood risk in accordance with the requirements of the Thames Estuary 2100 Plan.'</i> Supported.</p>	Comments noted. It is not within the remit of the Local Plan to modify existing infrastructure like weirs.	The policy has been amended to apply to all rivers and waterways in the borough.
Lois Davis	Co-ordinator Wandsworth Green Party			473	Policy LP60	We commend LP60 E "Development which encroaches onto the river foreshore will not be supported" and LP62, Moorings and Floating Structures especially the naturalisation element.	Comment noted.	No changes to the Local Plan are considered necessary.
Michael Atkins	Senior Planning Officer Port of London Authority			1480	Policy LP60	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP 60: River Corridors.</p> <p>Support part A with regard to the protection of the natural, historic and built environment of the River Thames corridor and watercourses within the borough.</p>	Comment noted.	<p>LP60 (Now LP58) has been updated to mention Estuary Edges as a consideration for any development along the River Thames.</p> <p>The supporting text has been updated to reflect the importance of the South East Marine Plan and the Coastal Concordat for applicants to consider the policies mentioned in this representation</p>

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Support parts B &amp; C on the protection and enhancement of the biodiversity value of the borough's blue infrastructure assets. As part of this is considered that the policy is made stronger by making a specific reference to the Estuary Edges guidance co-ordinated by the Thames Estuary Partnership.</p> <p>In principle support part D with regard to the protection of existing river infrastructure, and the support for new and enhanced infrastructure, including piers for riverbus services and the provision of enhanced services. This is supported by the PLA's Thames Vision goal to see double the number of people travelling by river – reaching 20 million commuter and tourist trips every year by 2035 – this should be promoted within the Local Plan.</p> <p>In principle support part E which states that development onto the river foreshore will not be supported, and the reference to the need to discuss proposals on the creation of new habitats with Natural England, The Environment Agency and the PLA.</p> <p>In addition, given the number of river access points along the river in the borough, the PLA considers that regard must be given to the use of existing piers as part of the delivery of small scale freight as well as for the maximisation of use for passengers. If viable, the dual use of these facilities could further help to achieve the Borough's sustainable travel goals with regard to improving air quality and decreasing road congestion for the boroughs local communities and this should be referenced in the supporting text.</p> <p>Support the reference to the Marine Management Organisation (MMO) in supporting paragraph 21.46 and the need to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of tidal river. However this requires an update with regard to the work the MMO have completed on the South East Marine Plan which is due to be adopted in 2021. This should be specifically referred to here as an important consideration.</p>		Paragraph 21.44 has been updated to stress the Council's ambition to maximise the use of the piers and infrastructure for public transport and the delivery of small scale freight in line with LP51 Sustainable Transport (Now LP 49) and LP54 Public Transport and Infrastructure (Now LP52)
Diana McCann	Boroughs Coordinator The Blue Green Economy			1439	Policy LP60	<p>LP60 River Corridors</p> <p>1. The natural, historic and built environment of the River Thames corridor and watercourses within the borough will be protected and, where appropriate, enhanced by rewilding to ensure the achievement of a high quality and accessible environment including through the provision of connections to existing and new communities and to maximise biodiversity benefits.</p> <p><b>[NB good to see Thames development being disallowed:</b></p> <p>Development which encroaches onto the river foreshore will not be supported. Opportunities will be taken, in consultation with partner agencies including Natural England, the Port of London Authority and the Environment Agency, to create new habitats and reduce flood risk in accordance with the requirements of the Thames Estuary 2100 Plan.]</p>	Comment noted.	<p>LP60 (Now LP58) has ben amended to mention Estuary Edges as a consideration for any development along the River Thames.</p> <p>Policy LP60 (Now LP58) has been amended to reiterate the requirements for set backs from LP12 Water and Flooding</p>
Terence Brown	Coordinator Wandsworth Friends of the Earth			1585	Policy LP60	<p><b>LP60 River Corridors</b></p> <p>This section seems to incorporate admirable requirements.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
Rachel Holmes	Planning Advisor Environment Agency			1617	Policy LP60	<p>See attachments on 1615 for more detail</p> <p>General amendment 2</p> <p>Part E of Policy LP60 'River Corridors' should be amended to incorporate reference to the riverside strategy approach: 'Development which encroaches onto the river foreshore will not be supported. Opportunities will be taken, in consultation with partner agencies including Natural England, the Port of</p>	Comment noted.	Amend policy E to include "and it's riverside strategy approach" at the end.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						London Authority and the Environment Agency, to create new habitats and reduce flood risk in accordance with the requirements of the Thames Estuary 2100 Plan and it's riverside strategy approach.		
Rachel Holmes	Planning Advisor Environment Agency			1621	Policy LP60	<p>See attachments on 1615 for more detail</p> <p><b>Encroachment – river related use</b></p> <p>LP60 River Corridors</p> <p>Part E of Policy LP60 'River Corridors' states that 'development which encroaches onto the river foreshore will not be supported'. We support this policy in the new Local Plan.</p>	Comment noted.	No changes to the Local Plan are considered necessary.
Rachel Holmes	Planning Advisor Environment Agency			1622	Policy LP60	<p>See attachments on 1615 for more detail</p> <p>Buffer zone</p> <p>We welcome that proposed Policy LP12 'Water and Flooding' Part E3 'Flood Defences' requires developments to be set back from river banks and existing flood defence infrastructure. We would like to highlight that this set back is required around all main rivers (16 metres for the tidal Thames and 8 meters for other main rivers) for the benefit of biodiversity as it is an important habitat, as well as for flood risk management purposes. This buffer zone should be free of any built structures or hardstanding, and be planted with native species. Any non-native species should be removed in the appropriate manner. Any lighting should be designed to ensure no negative impact on the river corridor. We strongly recommend the setback requirements are emphasised in proposed policy LP60 River Corridors.</p> <p>Recommended action: incorporate river buffer zones requirement into Policy LP60 River Corridors.</p> <p>We would also like to note that Part D of proposed policy LP60 'River Corridors' states that 'new and enhanced infrastructure, including piers for riverbuses and the provision of enhanced services, will be supported'. We would like to note that this is acceptable subject to also following the flood risk and biodiversity requirements laid out in the plan.</p> <p>Recommended action: clarify within Part D of Policy LP60 'River Corridors' that this will be supported as long as the flood risk and biodiversity requirements are also followed.</p> <p>Part E of proposed policy LP60 'River Corridors' states that 'development which encroaches onto the river foreshore will not be supported'. We strongly support this stance. Any land riverward of flood defences or in the river channel is classified as Flood Zone 3b within the SFRA and as such only water compatible and essential infrastructure is compatible</p> <p>Estuary Edges</p> <p>We encourage softening the existing hard banks on tidal river corridors as a way of enhancing biodiversity along the Tidal River Thames. We, along with other partners, have created the 'Estuary Edges' website (<a href="https://www.estuaryedges.co.uk/">https://www.estuaryedges.co.uk/</a>) which provides guidance and case studies on how best to do this. We strongly encourage reference to this is incorporated within the new Local Plan within Policy LP60 'River Corridors'.</p> <p>Recommended action: incorporate encouraging the 'Estuary Edges' method into policy LP60 'River Corridors'.</p> <p>LP60 River Corridors</p>	<p>LP57 Biodiversity outlines the Biodiversity Net Gain policy for the borough.</p>	<p>LP60 (D) (Now LP58) has been amended to include reference to LP57 Biodiversity (Now LP55) and LP12 Water and Flooding</p> <p>LP60 (Now LP58) has been updated to mention Estuary Edges as a consideration for any development along the River Thames.</p> <p>Policy LP60 (Now LP58) has been amended to reiterate the requirements for set backs from LP12 Water and Flooding</p>



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>New developments adjacent to the River Wandle must demonstrate a Biodiversity Net Gain to the river corridor, and provide a buffer of natural river bank and riverside habitat (16 metres for tidal Thames and 8 metres for all other main rivers). In-channel restoration should take place where desirable.</p> <p>New developments adjacent to the tidal River Wandle and Thames should demonstrate a Biodiversity Net Gain to the river corridor and provide a suitable naturalised bank to the estuary where feasible to do so, and include additional terrestrial habitats long the river corridor where possible. This is to ensure that river wildlife, particularly mobile and nocturnal wildlife are restored to being able to use river habitats and move along the river corridor.</p>		
Mr Robert Arguile	Chair The Putney Society			390	Policy LP61	<p>A.4. '....protects and enhances the habitat value of the river and shoreline, promotes the naturalisation of the riverbanks where feasible, and does not cause harm to the operation of the river regime, or its environment, biodiversity or archaeology (including to its banks, walls and foreshore)'. We welcome the works at the mouth of the Wandle (the spit is lovely) and tiny pockets to the east of Wandsworth Bridge. See above re the Beverley Brook.</p> <p>A.6. '...does not cause harm to the special recreational character and function of Putney Embankment, including in connection with river sports. Facilities and activities which contribute to Putney Embankment's special recreational character will be protected and new facilities that make a positive contribution will be supported'. Supported. But this should not mean more cafes.</p>	Comments noted	The policy has been amended to apply to all rivers and waterways in the borough.
Clare Graham	Chair of Open Spaces Committee Battersea Society			508	Policy LP61	<p>LP61 Riverside. The Thames Path is an open space; there should be a policy requirement to include along its length wayfinding signs connecting it with other open spaces. We would also like to see plaques giving information about the history of its riverside sites.</p> <p>A4. "....where feasible, and does not cause harm to the operation of the river regime, or its environment, biodiversity or archaeology (including to its banks, walls and foreshore)." This clause can be simplified and have an objective to promote naturalisation, which can be at a modest scale or part of a more complex restoration scheme. A proposal that was harmful to biodiversity would fail the over-arching requirement for net gain.</p> <p>C"....unless it can be clearly demonstrated that neither this nor any other river-dependent or river-related use is feasible or viable" is unnecessary. The Council's negotiating position should be to resist the loss of river-related or river-dependent uses or businesses as there are few opportunities for these activities along Wandsworth's riverside.</p> <p>F There should be a strategy and policy for public toilet facilities. This is a social equity issue, particularly for the elderly and women. Better provision would encourage more people to walk, and benefit mental and physical wellbeing.</p>	The suggested signposting and toilet facilities may be a requirement of any new development to support wayfinding but as a borough wide scheme that would not be within the remit of the Local Plan.	LP60 (Now LP58) has been amended to mention Estuary Edges as a consideration for any development along the River Thames.
Hassan Ahmed Hassan Ahmed	GLA			1110	Policy LP61	<p><b>Thames Policy Area (TPA)</b></p> <p>In accordance with PLP Policy SI 14 Wandsworth should establish the precise boundary of the TPA in collaboration with its neighbouring boroughs, including those across the river. In addition, boroughs like Wandsworth are encouraged to plan for the TPA through joint Thames Strategies.</p>	The Wandsworth Policies Map does include the exact boundary for the Thames Policy Area	No changes to the Local Plan are considered necessary.
Michael Atkins	Senior Planning Officer Port of London Authority			1481	Policy LP61	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP 61: Riverside Uses, Including River Dependent, River-related, and River Adjacent Uses.</p> <p>Support part A1 on the need for new development to provide sustainable transport choices including through the provision of access to public transport routes and incorporates public riverside walks and cycle-paths, and part A2 on protecting local and strategic views. Support parts A3 and A4 on supporting proposals which provide for new or enhanced open spaces and</p>	Comments noted	LP61 (Now LP59) has been amended to include a specific reference to the vital need to provide appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) and suicide prevention measures where appropriate alongside riverside areas.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>other community based facilities and amenities, and that protect and enhances the habitat value of the river and shoreline.</p> <p>Broadly support part A5 on supporting developments which do not adversely impact on neighbouring sites and uses, including to docks, safeguarded wharves or other river-based infrastructure. However it is noted that this is the only specific reference to safeguarded wharves within the policy. As noted throughout this response, given the location of five safeguarded wharves within the borough, and the key strategic role they have, it is considered that there is a specific policy reference on the need to ensure the protection and maximisation of use of these sites for waterborne freight cargo handling in policy LP61. Parts C &amp; D go on to state that the borough will resist redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses, unless it can be clearly demonstrated that neither this nor any other river-dependent or river-related use is feasible or viable. This could be an appropriate part of the policy to reference safeguarded wharves and include a specific link to associated policy LP43 (Protected wharves).</p> <p>Support part A6 on the need for new development to not cause harm to the special recreational character and function of Putney Embankment, including in connection with river sports and the supporting statement that existing facilities and activities which contribute to Putney Embankment's special recreational character will be protected and new facilities that make a positive contribution will be supported.</p> <p>In principle support part B of policy LP 61 which states that where appropriate, the Council will seek financial contributions towards the provision, or upgrading, of riverside infrastructure. Linked to this it is considered that either this policy or policy PM9 (Wandsworth's Riverside) is expanded to include a specific reference to the vital need to provide appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) and suicide prevention measures where appropriate alongside riverside areas.</p> <p>With regard to supporting paragraph 21.48 on existing infrastructure linked to sports and physical activities to confirm this is supported by the PLAs Thames Vision which includes the goal to see greater participation in sport and recreation on and alongside the water. As a borough with ambitious growth proposals which will result in an increased population and therefore an increased demand for sports and recreational facilities the boroughs waterways should be utilised to their full potential, including for recreational purposes in appropriate areas.</p>		
Terence Brown	Coordinator Wandsworth Friends of the Earth			1586	Policy LP61	<p><b>LP61 Riverside Uses, Including River Dependent, River-related and River Adjacent Uses</b></p> <p>No comment on these admirable policies!</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Rachel Holmes	Planning Advisor Environment Agency			1618	Policy LP61	<p>See attachments on 1615 for more detail</p> <p>General amendment 3</p> <p>Policy LP61 'Riverside Uses, Including River Dependent, River-related and River Adjacent Uses' should include reference to the riverside strategy approach. It could potentially state: 'Where appropriate, the Council in consultation with the Environment Agency will seek opportunities to implement the Thames Estuary 2100 Plan's riverside strategy approach to create better access to the river and enhance the riverside environment, all whilst enabling the tidal flood defences to continue to provide protection from the increasing risk of flooding as a result of climate change.'</p> <p>Recommended action: incorporate reference to the Riverside Strategy approach in the above three sections.</p>	Comments noted.	LP60 River Corridors (Now LP58) has been updated to include reference to the riverside strategy

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Rachel Holmes	Planning Advisor Environment Agency			1697	Policy LP61	<p>See attachments on 1615 for more detail</p> <p>LP61 'Riverside Uses, Including River and Dependent, River-related and River Adjacent Uses'</p> <p>LP61 'Riverside Uses, Including River and Dependent, River-related and River Adjacent Uses' discusses development of sites in proximity to the riverside. This policy should also make it clear what development is acceptable within the river channel itself and on the river foreshore. Only water compatible use will be acceptable in the river and on the foreshore. River channels and their foreshores should not be used as an extension of the developable land in the borough. This is subject to other flood risk requirements e.g. defence raisings and any floodplain compensation requirements, and other biodiversity requirements, e.g. biodiversity net gain and mitigation. This is in line with NPPG which states that only water compatible uses should be located within Flood Zone 3b.</p> <p>The policy should include a new point which states that the council will prevent new development and structures into the water space unless it serves a water related purpose. Recommended action: We strongly recommend you incorporate that only river related / water compatible uses will be acceptable in river channels.</p>	Comment noted.	LP61 (Now LP59) has been amended to clarify that only river related / water compatible uses will be acceptable in river channels.
Michael Atkins	Senior Planning Officer Port of London Authority			1482	Policy LP62 1	<p><b>See the attachment on comment 1441 the representation for context</b></p> <p>- Policy LP 62 Moorings and Floating Structures.</p> <p>In principle support policy LP 62 with regard to river related development which enhances the river infrastructure and increases access to the Thames including short-stay visitor moorings and piers and jetties for river-based recreation, passenger or goods transport. As noted above under Allocation WT9 (Feathers Wharf) the potential for the use of the River Wandle, where appropriate for additional residential moorings, adding to the character of the boroughs waterways in line with local and regional planning policies should form a consideration as part of this policy.</p> <p>As part of the supporting statement to policy LP 62 it is considered that reference is given to the requirement that any works proposed in, on or over the Tidal Thames also requires a River Works Licence with the PLA in addition to the requirement planning permissions.</p> <p>I hope this information is of assistance. If you wish to discuss any of the issues raised in this response particularly on the boroughs safeguarded wharves and the proposed Nine Elms – Pimlico crossing please contact me on the details contained at the top of this response.</p> <p>Yours Faithfully</p> <p>Michael Atkins</p>	The Wandle Delta is within a focal point of activity and considered as part of this policy.	Paragraph 21.49 has been amended to require an development proposed in, on or over the Tidal Thames also requires a River Works Licence with the PLA in addition to the required planning permissions.
Diana McCann	Boroughs Coordinator The Blue Green Economy			1440	Policy LP62 1	<p>LP62 Moorings and Floating Structures</p> <p>We very much support this clause especially naturalisation element</p> <p>The culverting of river channels and watercourse will not be permitted and the naturalisation of river channels and watercourses will be sought as part of development proposals where appropriate and feasible</p>	Comments noted.	No changes to the Local Plan are considered necessary.
Terence Brown	Coordinator Wandsworth Friends of the Earth			1587	Policy LP62 1	<p><b>LP62 Moorings and Floating Structure</b></p> <p>A and B: No comment on most of these admirable policies!</p>	Comment noted.	No changes to the Local Plan are considered necessary.

## Chapter 22 - Implementation, Delivery and Monitoring

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Monica Tross	Sectary to planning committee Battersea Society			748	22.1	<p>Implementation</p> <p>While we recognise that there are many desirable policies and strategies in this, as in the current Plan, we must register a major concern regarding the extent to which policies have been, and will be, implemented.</p> <p>It is our experience that policies set down in previous Plans have been no protection against undesirable development and have, in many instances, been observed more in the breach than observance. The final short and sketchy section of the Plan gives no comfort in this regard.</p> <p>Finally, we agree that the site allocations in the Plan should be seen as the key delivery mechanism to meet the housing, employment, retail and other needs that have been identified, and that engagement with landowners, employers, and local community representatives should take place as soon as possible. But many of the allocations have been in previous Plans, and it is concerning that precisely when and how such engagement should take place, and with what outcomes, is far from clear.</p> <p>Despite our criticisms, we have aimed at providing useful comments on the draft document and these follow, set out under the relevant sections, with a focus on the implications for Battersea.</p>	A new monitoring policy has been added to the Local Plan LP61 once adopted the Local Plan will be monitored to enable the understanding of the extent to which the Local Plan policies deliver the Council's vision and objectives for Wandsworth. Changing circumstances means that the monitoring of policies is required to deliver, manage, and if necessary, adapt or bring forward an alternative planning approach to Wandsworth's growth	New policy LP61 Monitoring the Local Plan and background text added to Plan.
Councillor Graham Loveland	Labour Group			649	22.1	<p>22 Implementation, Delivery and Monitoring There is no mention in this chapter of the need to ensure sufficient resources and skills are in place to ensure that planning applications are effectively scrutinised and that the Plans aspirations and detailed requirements are met, and that this is 'carried through' when schemes are built out. This is especially challenging given the range of requirements set out in the Plan and the anticipated changes to the planning system.</p>	A new monitoring policy has been added to the Local Plan LP61 once adopted the Local Plan will be monitored to enable the understanding of the extent to which the Local Plan policies deliver the Council's vision and objectives for Wandsworth. Changing circumstances means that the monitoring of policies is required to deliver, manage, and if necessary, adapt or bring forward an alternative planning approach to Wandsworth's growth	New policy LP61 Monitoring the Local Plan and background text added to Plan.
Monica Tross	Sectary to planning committee Battersea Society			836	22.1	<p><b>22: IMPLEMENTATION, DELIVERY AND MONITORING</b></p> <p>This appears to be a reiteration of areas of the plan rather than being 'an overview of the ways the Council will deliver and monitor the delivery and of the Local Plan's vision, objectives, area strategies and policies'.</p> <p>Delivery relies heavily on others and there is little or no detail of the Council's own strategies and initiatives. Rather 'the Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies ...' It may be unfair to say there is no sense that the Council is the main driver in this; but the constant reference to other agencies throughout the document, and our past experience of good policies set down but subverted through negotiation, gives little comfort that this will be the case.</p> <p>It would be helpful to include as an appendix in tabular form the main agencies involved – in addition to landowners and developers - in successful delivery of policies included in the Plan. This would not imply any direct commitment but provide an idea of where effort might be required for joint working and cooperation. Some areas clearly are totally dependent on individual or private submission of development proposals. However where public bodies, or several sectors, are involved an indication in broad terms of anticipated timescales would also be helpful for known programmes of work.</p> <p>It is unfortunate that the Infrastructure Delivery Plan (IDP) will not be available until the regulation 19 version of the Plan is produced. It appears that the Authority Monitoring Report for the current Local Plan is in arrears and we look forward to commenting on the latest version of this, and of the IDP for this draft Plan, in due course.</p>	<p>A new monitoring policy has been added to the Local Plan LP61 once adopted the Local Plan will be monitored to enable the understanding of the extent to which the Local Plan policies deliver the Council's vision and objectives for Wandsworth. Changing circumstances means that the monitoring of policies is required to deliver, manage, and if necessary, adapt or bring forward an alternative planning approach to Wandsworth's growth. A new policy LP63 Neighbourhood Planning has been added to provide a mechanism for communities to bring forward development and to have a say in the location of development.</p> <p>The Local Plan Validation Checklist sets out that applications may need to be supported by a statement setting out how the applicant has complied with the requirements for preapplication consultation and demonstrating that the views of the local community have been sought and taken into account</p>	New policy LP61 Monitoring the Local Plan and background text added to Plan.
Dr Rosena				1211	22.1	<p>Implementation:</p>	A new monitoring policy has been added to the Local Plan LP61 once adopted the Local Plan will be monitored to enable the understanding of the extent to which the Local Plan policies deliver the Council's vision and	New policy and background text added to Plan. LP61 Monitoring the Local Plan and LP63 Neighbourhood planning added.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Allin-Khan						<p>I note that there is no mention of ensuring that planning applications are effectively scrutinised and that the plan's aspirations and detailed requirements are met.</p> <p>This is especially challenging given the range of requirements set out in the plan and the anticipated changes to the planning system.</p> <p>I would ask that a consultation with residents is considered, as well as the necessary resources provided to allow for proper scrutiny of this plan.</p>	objectives for Wandsworth. Changing circumstances means that the monitoring of policies is required to deliver, manage, and if necessary, adapt or bring forward an alternative planning approach to Wandsworth's growth. A new policy LP63 Neighbourhood Planning has been added to provide a mechanism for communities to bring forward development and to have a say in the location of development.	
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1350	22.1	- We would like more specified targets which the plan can be measured against.	A monitoring framework has been prepared and will sit alongside the Local Plan and can be updated where appropriate. An updated monitoring policy now refers to this framework.	No changes to the Local Plan are considered necessary
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1351	22.15	- When will the full financial viability be carried out? (22.15)	A Whole Plan Viability study has been undertaken in 2021 to inform the Regulation 19 version of the Local Plan. This document will be published on the Council's webpage as an evidence base document.	No changes to the Local Plan are considered necessary.
Metropolitan Police Service	Metropolitan Police Service			1604	22.21	<p>Section 106 / CIL contributions to mitigate impact on crime</p> <p>The MPS would like to have the ability to receive financial contributions during the Wandsworth Local Plan period and are in the process of working up a formula linking to development impacts which should be available soon.</p> <p>A breakdown of non-property related infrastructure sought by the MPS in the future is detailed below. This list has been taken from other Police and Crime Commissioners who are already receiving financial contributions:</p> <ul style="list-style-type: none"> <li>• Staff set up cost</li> <li>• Workstation/Office equipment.-Training.</li> <li>• Vehicles-Patrol vehicles.-Police community support officers (PCSO) vehicles.-</li> <li>• Mobile IT: The provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office in order to maintain a visible presence.</li> <li>• CCTV technologies: Automatic Number Plate Recognition (ANPR) cameras to detect crime related vehicle movements.</li> <li>• Police National Database (PND): Telephony, licenses, IT, monitoring and the expansion of capacity to cater for additional calls.</li> </ul> <p>Neighbourhood police facility infrastructure requirement</p> <p>The MPS have an emerging infrastructure requirement for a neighbourhood police facility that can provide a base of operation for officers of the MPS. Further information on the neighbourhood police facility will be disclosed soon.</p>	Comments noted. Policy LP1 sets out that development proposals must minimise opportunities for crime and antisocial behaviour, which might involve through planning obligations where justified. The Council adopted the Planning Obligations SPD in 2020, which includes specification on contributions to fund CCTV infrastructure. The Planning Obligations SPD will be updated to reflect the revised policy position on adoption of the new Local Plan.	No changes to the Local Plan are considered necessary.
Dr Stephen Bieniek	Wandsworth Liberal Democrats			1352	22.26	The current quantitative indicators on Wandsworth website seem out of data, will these be updated? (22.26)	The Council publishes the Authority Monitoring Reports for 'housing' and 'industry, employment and retail policy performance' annually, and the website is updated when these are available.	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Mr Malcolm Souch	Project Director NHS London Healthy Urban Development Unit (HUDU)			1493	22.26	Paragraph 22.26 (chapter 22) refers to the use of quantitative indicators and the performance of the Local Plan will be reported in the Authority Monitoring Report (AMR). We would welcome the opportunity to discuss appropriate indicators to use to monitor the health and wellbeing objective and Policy LP15 Health and Wellbeing.	A monitoring framework will sit alongside the Local Plan and can be updated where appropriate. The Council will work with NHS HUDU developing the indicators.  See also comment 1350	No changes to the Local Plan are considered necessary.
	Wandsworth Cycling (London Cycling Campaign)			237	21.26	With reference to Para 22.9: "Improvements to transport infrastructure, particularly to public transport as well as cycling and walking, will be essential to the delivery of the Spatial Strategy. " - an interesting measure would be the increase in cycle parking (and harder to count) the reduction in car parking spaces across the borough	Comment noted.	No changes to the Local Plan are considered necessary.

## Chapter 23 – Appendix

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
ms Jane Briginshaw	Chair Tooting Bec and Broadway Neighbourhood Forum			1023	23.1	Page 397: Appendix 2- Tooting Place Map The draft plan makes it clear that it is the Urban Design Strategy (Arup, 2020) <sup>12</sup> that informed the approach to tall buildings, and it is good to see that the Tooting Characterisation Study we commissioned was referred to (though again, without prior engagement with the Forum). However, the Urban Design Strategy itself appears internally inconsistent. Its Figure 251, which is the source for the Local Plan Page 397 map, suggests (alongside accompanying text on page 199 of the Urban Design Strategy) that Longley Road is an appropriate location for tall buildings. This seems to be at cross-purposes with Figure 202 on page 147 of the Strategy that correctly shows the same location as having a high sensitivity to change. This inconsistency needs to be resolved in the Urban Design Strategy and then in the Local Plan in favour of the (correct) Figure 202 conclusion. Given the predominant scale of building on Longley Road -very much domestic and two storey- it is difficult to see any justification for five storey development, even with the caveats provided on page 199 of the Urban Design Study. Taller buildings would, in this location, be 12 <a href="https://www.wandsworth.gov.uk/media/8075/urban_design_study.pdf">https://www.wandsworth.gov.uk/media/8075/urban_design_study.pdf</a> <sup>13</sup> entirely out of character, detrimental to the street scene and contrary to the distinctiveness of this part of Tooting made up of early Victorian and Edwardian villas with gardens.	Areas identified as having high sensitivity and opportunities for tall buildings are not mutually exclusive. The methodology is set out in the Urban Design Study. Nevertheless, the Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. Longley Road has not been identified as having opportunities for mid-rise or tall building.	No changes to the Local Plan are considered necessary.
Dr David Curran	Lavender Hill for Me			1183	23.10	23.10 –Marketing evidence should include evidence of rents and contracting terms proposed, and how they relate to other recently achieved rents (to avoid 'price on application' rents being pitched at unreasonable rates or with unreasonable conditions merely in order to subsequently justify removal of Class E use), as well as of evidence of active marketing of the premises.	The marketing evidence in appendix B sets out that '*The price the site has been marketed at and whether the price was reduced, stating the date that it was reduced (if relevant). Marketing should always be at a price that genuinely reflects the market value of the property in its current use and current quality. Wording has been added to include 'and contracting terms proposed.'	Wording added to Marketing appendix to refer to contracting terms proposed.
ms Libby Lawson	Tooting History Group			412	23.14	Longley Road is predominantly two storey and domestic in scale. It is made up of large early Victorian and Edwardian villas in comparatively large gardens, further Edwardian and Victorian terraces and some more recent development built on a similar scale. It is home to four locally listed buildings; three houses and a single storey chapel and Grade 2 listed Waterfall House. We can see no justification for this road to be considered a suitable site for tall buildings which would be of entirely out of character and detrimental to the distinctiveness to this part of Tooting.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. Longley Road has not been identified as having opportunities for mid-rise or tall building.	No changes to the Local Plan are considered necessary.
Dr Rosena Allin-Khan				1189	23.14	<ul style="list-style-type: none"> <li>Tall Buildings: Appendix 2, Tall Buildings p.394</li> </ul> <p>I am concerned that a number of the proposed developments involve high-rise properties of up to 8-10 storeys high. Indeed, in Appendix 2 Tall Building Maps, the map for Tooting shows land on the south side of Longley Road (in character area F2) as an area where there are opportunities for tall buildings within a local context. The predominant building scale along the entire length of Longley Road is two storeys with some taller (3 and 4 storey) insertions. Therefore, developments such as those shown in character area F2 will be completely out of place in areas such as Longley Road.</p> <p>I believe that all developments need to be complementary to the local environment to ensure they are consistent with the needs of local residents. This will avoid occupants of newer developments feeling alienated by existing residents.</p> <p>Furthermore, I would also like to question why character area F2a is identified as being able to accommodate tall buildings, subject to context. Most buildings within this area are newly<sup>[1]</sup>developed residential buildings and there is no obvious location where high-rise developments may be acceptable. I believe that this area should be removed from the map</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. Longley Road has not been identified as having opportunities for mid-rise or tall building.	No changes to the Local Plan are considered necessary.
Mr Jeremy Trotter				256	Picture 23.1	I would like to comment on the Draft Local Plan, particularly with regards to paragraph 14.43, and the map on page 391.  This map designates Mitcham Road within a yellow hatch as being suitable for 'opportunities for tall buildings within a local context', from Longley Road to Amen	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and	No changes to the Local Plan are considered necessary.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>Corner. I would like to argue that the properties along Mitcham Road are not suitable for tall buildings. The terraces fronting Mitcham Road between Stella Road and Otterburn street, Otterburn Street and Glasford Street, Glasford Street and Renmuir Street, Renmuir Street and Longley Road date from approximately 1907, a time when the suburbs were expanding and there was much Edwardian development in Tooting. The properties are generally all in a good condition, some with their original slates and sash windows. They all have a distinctive pitched dormer window on the front elevation, which provides Mitcham Road with a regularity. Number 284 is a Victorian former public house, which provides strong local character and identity.</p> <p>The properties are made from London stock brick, a typical building material of this area which lends this frontage with local character and reinforces local identity. Each building is only two storeys high which is appropriate to the character of Tooting Graveney. The gable form of the dormers roofs repeats across the wider context and with the former public house at No.284.</p> <p>Therefore this area should not be proposed as being frontages suitable for tall buildings within a local context, as for these properties to become tall buildings would result in the loss of original Edwardian properties that are only 2 storeys high. Development higher than this would be inappropriate to the scale of development within the local context, and weaken the strong community identity.</p>	provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The number of locations with opportunities for tall buildings in Tooting has been reduced as a result of changes to the policy approach.	
Mr P Coulson	Member Deodar, Merivale & Florian Roads Residents' Assoc.			952	Picture 23.1	We have read Richard Norton's letter on behalf of the Deodar- Merivale- Florian Roads Residents Association and support their objections.	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.
Mr Richard Norton				951	Picture 23.1	<p>I am writing on behalf of the Deodar-Merivale-Florian Roads Residents Association to express our strong objection to the proposal, in the Pre-Publication version of the Draft Local Plan, to permit high rise buildings to be built at the western end of Putney Bridge Road (PBR). We believe that high rise buildings should be permitted no further east along Putney Bridge Road from Putney High Street than Brewhouse Lane on the north side and the existing hotel on the corner of PBR and Burstock Road on the south side.</p> <p>Permitting high rise buildings to encroach further east along PBR than this would seriously damage the pleasant residential character of the neighbourhood on both sides of PBR. In addition:</p> <ul style="list-style-type: none"> <li>&gt; The 2-3 storey residential buildings to the north of PBR at the western end of Deodar Road would suffer unacceptable loss of light and particularly direct sunlight in autumn, winter and spring.</li> <li>&gt; The single storey historic alms houses on the southern side of PBR between Burstock and Atney Roads would be seriously overshadowed.</li> <li>&gt; The preservation of the historic character of the neighbouring conservation areas would be adversely affected.</li> <li>&gt; Further over development of this stretch of PBR would aggravate the existing traffic congestion at the junction of PBR and the High Street, where traffic frequently backs up to the east beyond Oxford Road in the morning rush hour.</li> </ul> <p>We appreciate that this is still only a draft document but we are anxious that this, we hope, mistake is rectified as soon as possible and that no high rise development will be proposed or permitted further east along PBR than Brewhouse Lane on the north side and the hotel on the corner of PBR and Burstock Road on the south side in the final Draft Local Plan scheduled to be published in Spring 2022</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.



Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Ben Allpass				909	Picture 23.1	<p>I am writing to register my strong objections to part of this plan. I'm a resident of 1 Deodar Road, and the potential for development on Putney Bridge Road to Deodar Road is unacceptable. We already receive reduced afternoon light due to the nearby buildings, and any further tall buildings would greatly exacerbate this. In addition, we have a terrace on the roof and the privacy of this would be greatly reduced.</p> <p>I understand your desire to develop and push the borough further in places it lacks, however I think you'd be severely harming a pleasant residential street with this particular aspect.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.
Chris Poll				918	Picture 23.1	<p>I wish to object in the strongest possible terms to the Wandsworth Council's draft Local Plan proposal to allow the construction of tall buildings along Putney Bridge Road all the way from Putney High Street to Deodar Road (so including Dynamo and the terrace of small shops adjoining it), and around the corner to include the site of 1 Deodar Road.</p> <p>I understand from John Locker and Paul Dolan that the proposed plan inaccurately includes 1 Deodar Road but that is still utterly unacceptable as any redevelopment of the existing buildings on the north side of Putney Bridge Road must not increase the existing height and density. Any proposals for redevelopment east of Brewhouse Street must be completely removed from the plan because:-</p> <ol style="list-style-type: none"> <li>1. Loss of natural and sun light to properties at the western end of Deodar Road.</li> <li>2. Change of character to an area wording Deodar Road conservation zone</li> <li>3. Any such proposals would contravene the conditions assured to Deodar Residents when Brewhouse Street was redeveloped.</li> <li>4. Any parking for any redevelopment must be integrated to within the redevelopment. Parking space is already very scarce.</li> <li>5. The character of the neighbourhood would be destroyed.</li> <li>6. The single storey historic almshouses on the southern side of Putney Bridge Road between Burstock and Atney Roads would be seriously overshadowed.</li> </ol> <p>Any increase in traffic as result of redevelopment would be unacceptable.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.
Elly Price				950	Picture 23.1	<p>I object to the tall buildings proposal to allow 5+ story buildings to be extended from Putney High Street to the junction of Deodar Road. Up to Brewhouse Lane is acceptable but beyond that you start to encroach on leafy residential roads which will have an impact on light, noise and increased pollution.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation.
Cllr Graeme Henderson and Cllr Rigby	Cllr Earlsfield Labour Party			925	Picture 23.4	<p>Tall Buildings</p> <p>Appendix 2 Tall Buildings p394</p> <p>We are also concerned that a number of the proposed developments in Earlsfield involve high rise properties some up to 8-10 storeys high. Such developments are completely out of place in an area such as Earlsfield. All developments need to be complementary to the local environment and ensure that they are consistent with</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. The number of locations with opportunities for tall buildings in Earlsfield has been reduced as a result of changes to the policy approach.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						the needs of local residents to avoid creating a "them and us" culture between the occupants of new developments and existing residents.		
Miss Anna Robotham				562	Picture 23.5	<p>I am writing on behalf of the Deodar-Merivale-Florian Roads Residents Association to express our strong objection to the proposal, in the Pre-Publication version of the Draft Local Plan, to permit high rise buildings to be built at the western end of Putney Bridge Road (PBR). We believe that high rise buildings should be permitted no further east along Putney Bridge Road from Putney High Street than Brewhouse Lane on the north side and the existing hotel on the corner of PBR and Burstock Road on the south side.</p> <p>Permitting high rise buildings to encroach further east along PBR than this would seriously damage the pleasant residential character of the neighbourhood on both sides of PBR. In addition:</p> <ul style="list-style-type: none"> <li>&gt; The 2-3 storey residential buildings to the north of PBR at the western end of Deodar Road would suffer unacceptable loss of light and particularly direct sunlight in autumn, winter and spring.</li> <li>&gt; The single storey historic alms houses on the southern side of PBR between Burstock and Atney Roads would be seriously overshadowed.</li> <li>&gt; The preservation of the historic character of the neighbouring conservation areas would be adversely affected.</li> <li>&gt; Further over development of this stretch of PBR would aggravate the existing traffic congestion at the junction of PBR and the High Street, where traffic frequently backs up to the east beyond Oxford Road in the morning rush hour.</li> </ul> <p>We appreciate that this is still only a draft document but we are anxious that this, we hope, mistake is rectified as soon as possible and that no high rise development will be proposed or permitted further east along PBR than Brewhouse Lane on the north side and the hotel on the corner of PBR and Burstock Road on the south side in the final Draft Local Plan scheduled to be published in Spring 2022.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation
Ms Geraldine Talbot				963	Picture 23.5	<p>According to the draft local plan it is intended to allow construction of high rise buildings to the east of Putney High Street along the north side of Putney Bridge Road (PBR) from Brewhouse Lane to the western entrance to Deodar Road.</p> <p>There are a number of reasons why this should not be allowed to happen and should be expressly excluded from the Draft Local Plan when published in 2022.</p> <ol style="list-style-type: none"> <li>1. Permitting high rise buildings to encroach further east along PBR would seriously damage the residential character of the neighbourhood on both sides of PBR.</li> <li>2. The residential buildings to the north of PBR at the western end of Deodar Road would suffer unacceptable loss of light and particularly direct sunlight in autumn, winter and spring.</li> <li>3. The single storey historic alms houses on the southern side of PBR between Burstock and Atney Roads would be seriously overshadowed.</li> <li>4. The preservation of the historic character of the neighbouring conservation areas would be adversely affected.</li> <li>5. Further over development of this stretch of PBR would aggravate the existing traffic congestion at the junction of PBR and the High Street, where traffic frequently backs up to the east beyond Oxford Road in the morning rush hour.</li> </ol> <p>High rise buildings, particularly for residential use, would have the potential to put further pressure on the already limited parking in the area.</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.	No change to the Local Plan required as a result of this representation
Francesca Abbiati				962	Picture 23.5	I object to Wandsworth Council's draft Local Plan for Putney proposal to allow the construction of tall buildings along Putney Bridge Road all the way from Putney	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>High Street to Deodar Road (so including Dynamo and the terrace of small shops adjoining it), and around the corner to include the site of 1 Deodar Road.</p> <p>Any redevelopment of the existing buildings on the north side of Putney Bridge Road must not increase the existing height and density. Any proposals for redevelopment east of Brewhouse Street must be completely removed from the plan .</p> <p>I support the position on this issue expressed by The Putney Society.</p>	<p>of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	
Cllr Mike Ryder	LB Wandsworth			994	Picture 23.5	<p>As councillors for the Thamesfield Ward in Putney, we strenuously object to any proposal in the current draft Local Plan for Putney to extend the zone for possible "tall buildings" in Putney Bridge Road past Brewhouse Lane so it would extend to the junction with Deodar Road, including 1 Deodar Road. This would put possible future tall buildings right at the entrance to a conservation area and would overshadow the single-storey almshouses on the other side of Putney Bridge Road. There are already a plethora of tall buildings in the area, including Jubilee House as well as the blocks in Putney Wharf. Yours, Councillors Rosemary Torrington and Mike Ryder</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.
J.B Paterson				1588	Picture 23.5	<p>This is a response to the Pre-Publication Draft Local Plan</p> <p>"Opportunities for Tall Buildings" (Appendix 2)</p> <p>Relating to Putney Town Centre.</p> <p>As residents of Deodar Road, we object to the extension of the area east of Brewhouse Lane to Deodar Road, as being suitable for tall buildings.</p> <ol style="list-style-type: none"> <li>1. Deodar Road is a conservation area and any building taller than existing, between Brewhouse Lane and Deodar Road, would change the character of the area, and dominate the small residential buildings and shops which give the area its special character.</li> <li>2. Over the other side of Putney Bridge Road, is the block of alms houses, which have their own special character. They are only one storey in height and would be completely overwhelmed if they are facing multi-storey buildings.</li> </ol> <p>There is already very few parking spaces in the area and already a congestion of traffic in Deodar Road and surroundings. Any further tall buildings would make the situation much worse.</p>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.
J.B Paterson				1589	Picture 23.5	<p>This is a response to the Pre-Publication Draft Local Plan</p> <p>"Opportunities for Tall Buildings" (Appendix 2) Relating to Putney Town Centre. As residents of Deodar Road, we object to the extension of the area east of Brewhouse Lane to Deodar Road, as being suitable for tall buildings.</p> <ol style="list-style-type: none"> <li>1. Deodar Road is a conservation area and any building taller than existing, between Brewhouse Lane and Deodar Road, would change the character of the area, and dominate the small residential buildings and shops which give the area its special character.</li> <li>2. Over the other side of Putney Bridge Road, is the block of alms houses, which have their own special character. They are only one storey in height and would be completely overwhelmed if they are facing multi-storey buildings.</li> <li>3. There is already very few parking spaces in the area and already a congestion of traffic in Deodar Road and surroundings. Any further tall buildings would make the situation much worse.</li> </ol>	<p>The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.</p>	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
Alaina Macdonald				899	Picture 23.7	<p>I am a resident in Longley Road and I want to strongly object to the proposal on P397 Appendix 2 that Longley Road is an appropriate location for tall buildings.</p> <p>This is at odds with Figure 202 on p147 of the strategy that shows Longley Road has a high sensitivity to change - and as a local resident I believe the proposal on Figure 202 to be the appropriate one.</p> <p>Longley Road is a residential area - none of the houses are above three storeys - and the majority of the homes are Victorian and Edwardian period homes. To propose this becomes an appropriate area for tall buildings is totally at odds with the character of the street, detrimental to the local area and not in the residents or the local area interest. There is no local context to justify it.</p> <p>I would also add that Graveney ward suffers from a lack of open spaces - currently we have no local park (though one is finally being built) but there are no large open spaces at all in this ward. The gardens at the back of the houses in Longley Road provide much needed open space for the local residents. They are home to a lot of wildlife, including endangered species such as stag beetles and bats, and need to be protected to help support the local environment.</p> <p>This is made even more crucial because Longley Road itself is already one of the most polluted in the local area and marking this area as appropriate for tall buildings will only add to this pollution - so it should not be allowed to go ahead.</p>	Areas identified as having high sensitivity and opportunities for tall buildings are not mutually exclusive. The methodology is set out in the Urban Design Study. Nevertheless, the Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. Longley Road has not been identified as having opportunities for mid-rise or tall building.	No change to the Local Plan required as a result of this representation.
Shirley Dunn				1605	Picture 23.7	<p>I wish to object to the proposal to allow tall buildings to be developed in Longley Road.</p> <p>I have lived in Longley Road for many years and this proposal is at odds with the Victorian and Edwardian buildings none of which are above 3 storeys and many have been converted into flats.</p> <p>The area is already heavily congested with through traffic which larger buildings will affect and also put pressure on local amenities. Please take my views into consideration</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. Longley Road has not been identified as having opportunities for mid-rise or tall building.	No change to the Local Plan required as a result of this representation.
TR Property Investment Trust PLC	TR Property Investment Trust PLC	Mr Chris Brown	Rolfe Judd Ltd	1380	Table 23.1	<p><b>See attachment on comment 1377 for the full representation with context</b></p> <p>Appendix 2 of the Draft Proposed Local Plan Site Allocation</p> <p>WT8 recognises that the site has been acknowledged as an area which has 'opportunities for tall buildings' within the Urban Design Study (2020) and Appendix 2 of the emerging Local Plan (Reg18). However, Appendix 2 itself does not appear to acknowledge this. Appendix 2 identifies the site as being located within 'Sub-Area G1d' which has a prevailing height of 3-4 storeys and defines a tall building as being 5 storeys or more. Further to this, the site is not allocated as an area with opportunities for the following:</p> <ul style="list-style-type: none"> <li>- 'Opportunities for tall building clusters and/or landmarks'</li> <li>- 'Opportunities for tall buildings within town centres and along strategic routes', or</li> <li>- 'Opportunities for tall building within a local context'</li> </ul> <p>As set out in the emerging policy wording of LP4 and Policy D9 of the London Plan, it is suggested that any site outside of this designation would be an inappropriate location for a tall building. As the site currently has planning permission for tall buildings (ranging from 3-10 storeys), it is inherently an appropriate location for height which has been tested through the planning application process. The approved development makes a clear justification for height within the existing local context, which the London Borough of Wandsworth has approved as an appropriate site response. Whilst the sensitivities of the surrounding area are acknowledged, the principle for height has already been established on the site, therefore the policy should recognise height in this location as part of the future</p>	The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study.	No change to the Local Plan required as a result of this representation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation Details	Comment Number	Ref Number	Comments	Council Response	Outcome
						<p>local context height. We therefore implore the Council to recognise the site as having 'Opportunities for tall building within a local context'.</p> <p>Further to this. Table 23 in Appendix 2 sets out the definition of a tall building as it applies in a local context within each established 'Character Area' of the borough. Ferrier Street Industrial Estate falls within 'Sub Area G1d', which defines a tall building as being of 6 storeys or greater, based on a prevailing height of 3-4 storeys in the surrounding area.</p> <p>The mechanism for determining height is queried. The character areas and sub-areas result in 60 classifications for a "tall building" across the borough, varying between 5-8 storeys. Whilst we appreciate that these heights have been determined based on an Urban Design study of each area, we consider a more consistent approach to height, in line with the London Plan's definition of 6 storeys or 18 metres (Policy D9), would be appropriate across the entire borough.</p> <p>It is therefore sought to remove Table 23, and instead seek to adopt a consistent definition for 'Tall Building' height across the borough, in line with London Plan Policy D9.</p>		