

Addendum to the draft Local Plan Regulation 18 Statement of Consultation

On Friday 11th February 2022 this appendix was produced as an addendum to the Statement of Consultation to include missing comments from Transport for London's Commercial Development Team and the associated council response. This addendum should be read alongside the Statement of Consultation.

Consultee Full Name	Consultee Organisation Details	Agent Full Name	Agent Organisation details	Comment Number	Ref Number	Comments	Council Response	Outcome
Chris Ridout	TfL Commercial Development			1743	Policy SS1	<p>Thank you for providing the opportunity to comment on Wandsworth Local Plan Pre-Publication Regulation 18.</p> <p>Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>TfL CD Introduction</p> <p>TfL owns around 5,700 acres of land across London, including buildings, railway and bus stations, highways, rail lines and adjacent land, and worksites. TfL CD have prepared an ambitious commercial strategy that considers TfL's entire estate and we are looking at creative ways to make the most of these landholdings. Central to our work is supporting the Mayor of London's objectives of delivering significant long-term revenues from development to reinvest in the transport network and providing new housing and, importantly, genuinely affordable homes across the capital. Accordingly, our representations in respect of the Wandsworth Local Plan are set out below.</p> <p>TfL CD Representations</p> <p>TfL CD have engaged through the Local Plan preparation process and have submitted the following representations:</p> <ul style="list-style-type: none"> – Wandsworth Local Plan Employment and Industry Review 	<p>Policy LP24 was merged into a rewritten version of SS1, which seeks to clarify the development strategy for the borough, including setting the framework for delivering homes through the plan period. This policy identifies the Area Strategy areas as a priority (which are the main centres and regeneration priorities) and, with criterion A3, seeks housing delivery 'through the intensification of small sites within areas of higher accessibility'.</p>	<p>Policy LP24 and Policy SS1 has been deleted and rewritten as policy SDS1 defining the Spatial Development Strategy.</p>

						<p>– Wandsworth Local Plan Issues and Options (December 2018) – Wandsworth Call for Sites (March 2019)</p> <p>Policy SS1: Spatial Development Strategy</p> <p>TfL CD broadly support Policy SS1, particularly criterion C. However, it is suggested that criterion C also refers to the need for optimisation of development within areas with a good level of accessibility to make the most efficient use of more sustainable sites. TfL CD suggest that criterion C be amended as follows:</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 and particularly within existing or planned areas of good accessibility”</p>		
Chris Ridout	TfL Commercial Development			1745	Para 4.179	<p>Policy PM2: Wandsworth Town Place Based Policy</p> <p>TfL’s have freehold ownership of the Wandsworth Bridge Roundabout and have previously promoted this site via the Wandsworth Borough Council’s Call for Sites. TfL CD support the allocation of Wandsworth Bridge Roundabout (Ref: WT16) for “<i>Mixed use development including residential and economic uses with elevated active travel routes connecting the site to neighbouring development</i>”, although it is not completely clear what ‘elevated pedestrian/cycle routes’ would constitute. However, the requirement for the identity and architectural expression to draw upon the local context and represent a striking architectural composition is considered somewhat ambiguous and potentially onerous, particularly given the likely costs associated with reconfiguring a road network so any additional costs associated with creating a ‘striking’ building might impact on viability. It might also be beneficial to expand the redline boundary to reflect the potential for peninsulation, as referred to within the Wandle Delta Masterplan.</p>	<p>The elevated ‘pedestrian/ cycle route’ is in response to the centre of the roundabout being higher than ground level and the desire to avoid walking and cycling access by subways, ramps, and steps.</p> <p>The identity and architectural expression design requirement is considered to be appropriate for the site and as it is a key gateway and will require high quality design as is established in the Wandle Delta SPD area.</p> <p>The redline boundary is considered appropriate as it is in accordance with the Wandle Delta Masterplan SPD.</p>	No changes to the Local Plan are considered necessary.
Chris Ridout	TfL Commercial Development			1746	LP1 Urban Design	<p>Policy LP1: Urban Design</p>	Comment noted.	LP1 A(6) has been amended to not prevent or discourage appropriate innovation or change.

						<p>Criterion 6 notes that proposed development must 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. It is considered this wording is not in line with paragraph 127 of the National Planning Policy Framework 2019 (NPPF) and should be amended to reflect that development should be sympathetic to local character and history but not prevent or discourage appropriate innovation or change. It may also be more appropriate to provide the examples of what this applies to in the supporting text section, as by putting them in policy this could indicate that these are the most important features to consider.</p>		
Chris Ridout	TfL Commercial Development			1744	LP10 Responding to Climate Change	<p>Policy LP10: Responding to the Climate Crisis</p> <p>With regard to criterion B1 and B2, it is suggested that reference to viability is included alongside technical feasibility to justify not achieving the ‘Outstanding’ requirement.</p>	Comments noted.	Paragraph 22.14 has been amended to explain the Council’s position on viability.
Chris Ridout	TfL Commercial Development			1747	LP24 Provision of New Homes	<p>Policy LP24: Provision of New Homes</p> <p>TfL CD acknowledge Wandsworth Borough Council’s housing aspiration of approximately 1,950 new homes per year by 2028/2029. TfL own a number of sites within the borough and would be interested in collaborating with Wandsworth Borough Council to bring these sites forward for mixed use or residential-led development.</p> <p>However, TfL CD suggest that criterion C also recognises the need to optimise residential development within areas of good accessibility (existing or planned) such as in and around transport hubs.</p>	Policy LP24 was merged into a rewritten version of SS1, which seeks to clarify the development strategy for the borough, including setting the framework for delivering homes through the plan period. This policy identifies the Area Strategy areas as a priority (which are the main centres and regeneration priorities) and, with criterion A3, seeks housing delivery ‘through the intensification of small sites within areas of higher accessibility’.	Policy LP24 and Policy SS1 has been deleted and rewritten as policy SDS1 defining the Spatial Development Strategy.
Chris Ridout	TfL Commercial Development			1749	LP25 Affordable Housing	<p>Policy LP25: Affordable Housing</p> <p>TfL CD are committed to the delivery of 50% affordable housing across its development portfolio throughout London in line with the London Plan and TfL’s portfolio agreement with the Mayor.</p>	Support noted.	No changes to the Local Plan are considered necessary.

Chris Ridout	TfL Commercial Development			1750	LP26 Housing Mix	<p>Policy LP26: Housing Mix</p> <p>It is noted that indicative proportions are provided within the policy, but it may be appropriate to caveat in the policy that the latest housing data compiled by the borough should be used given these proportions may become out of date over the plan period.</p>	<p>The figures are informed by the Local Housing Need Assessment (2020), as discussed in the supporting text to Policy LP26. The policy justification has been amended to reflect that the mix defined in the policy will be applied having regard to individual site circumstances. The text also allows for the updating of current evidence in light of future changes to the data.</p>	<p>No changes to the Local Plan are considered necessary.</p>
Chris Ridout	TfL Commercial Development			1751	LP41 Affordable, Flexible and Managed Workspace	<p>Policy LP41: Affordable, flexible and managed workspace</p> <p>Many of TfL schemes already have high infrastructure costs particularly due to the need to safeguard our operational requirements and so additional costs are likely to significantly impact on what can be delivered, particularly given the requirement for TfL to provide 50% affordable housing in line with the London Plan. Therefore, the evidence base must robustly test this policy requirement alongside the requirements of other policies in the Local Plan and there must be sufficient flexibility in the policy to vary the amount of floorspace dependent on viability and the overall planning balance. In addition, Policy LP41 must accord with Policy DF1 of the Publication London Plan which states that where project viability becomes questionable, development should prioritise “<i>affordable housing and necessary public transport improvements</i>” above the provision of affordable workspace.</p>	<p>The requirements set out in the policy are subject to scheme viability (in Part B.2.b, with reference to the provision of a proportion of economic floorspace at an affordable rent), however to ensure flexibility in the implementation of the policy it is agreed this caveat should apply also to parts 2.a and b. The policy has been considered as part of the Whole Plan Viability Study.</p> <p>The London Plan forms part of the borough’s development plan, and the requirements set out within Policy DF1 with respect to prioritising affordable housing and necessary public transport improvements above affordable workspace will be applied to relevant applications.</p>	<p>Policy LP41.B.2. has been amended in line with this comment.</p>
Chris Ridout	TfL Commercial Development			1754	Proposed Site Allocations	<p>Unallocated Sites</p> <p>TfL CD have previously promoted a number of sites through the Wandsworth Call for Sites consultations, and the following TfL landholdings remain unallocated within the latest draft Local Plan. It is considered that these sites are suitable, available and developable and so should be allocated for mixed-use development:</p> <p>– 2, 2a, 2b, 2c, and 2d Tooting Bec Road, SW17 8BD</p>	<p>These sites were considered but not included in the Local Plan. Further details of the methodology for selecting Site Allocations is set out in the Site Allocation Methodology Paper.</p>	<p>No changes to the Local Plan are considered necessary.</p>

					<p>– 2, 4, 6, and 8 Trinity Road, SW17 7RE – Land at East Putney Station</p> <p>The call for sites forms which TfL CD submitted in March 2019 are provided alongside these representations for ease. TfL CD would like to continue to promote these sites for allocation within the Local Plan, and that they should also be included in the Council’s brownfield register.</p> <p>Concluding Remarks</p> <p>We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.</p>		
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