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London Borough of Wandsworth
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25 February 2022

Dear Sirs,

Wandsworth Local Plan Review (Regulation 19) Representations submitted on behalf of The Original Tour – Wandsworth Bus Garage

We write to submit Representations on behalf of The Original Tour ('TOT') and RATPDev in response to the Council's Local Plan Review (Regulation 19). 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 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 to ensure the allocation meets the tests set out at Paragraph 35 of the National Planning Policy Framework (NPPF).

BACKGROUND

Land Ownership

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'). The Covid-19 pandemic has had significant implications on the operations at WBG given the change in tourist activities over the last two years. Therefore, TOT and RATPDev have had to review their operations, and have made the decision to vacate the site in Q1 2023. The letter provided by TOT at Appendix 1 confirms this.

The withdrawal of the transport use frees up the site for various potential alternative uses, with the potential for sensitive extensions and infill development. It is important that this is recognised within the site allocation.

Grade II Listing

WBG is grade II listed, and the Historic England listing is included at Appendix 2 for reference. As identified on the Historic England website:

*'The Details section 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 summary of the main features of the building or site**....*

*'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 **since the start of post-war listing**, greater efforts have been made to explain the history of a building and to **outline its claims to special interest**'. [our emphasis]*

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.



RICS Regulated by RICS



Existing Site Allocation

The site is allocated in the Wandsworth Local Plan (Site Specific Allocations Document 2016 and Employment and Industry Document December 2018), 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 re-instatement 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.

London Borough of Wandsworth Aspirations

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 adopted Wandle Delta Supplementary Planning Document ('WSPD') (September 2021), 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).

It is clear from the draft WSPD 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 (2.2.19). 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:

'Dominance of large industrial buildings is unwelcome, including palisade fencing, blank façades and the presence of heavy goods vehicles/waste trucks with smell, noise and pollution. These combine to make a harsh pedestrian environment and poor legibility...'

It is clear from reviewing the Council's documents that LBW'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.

PLANNING POLICY CONTEXT

National Planning Policy Framework (2021)

The NPPF sets out the tests against which Local Plans should be prepared and assessed. Local Plan policies should follow the approach of the presumption in favour of sustainable development.

The principal test guiding policy adoption is that of 'soundness', namely that the plan should be (NPPF Paragraph 35):

- **'Positively prepared'** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and **consistent with achieving sustainable development**;
- **Justified** – the plan should be the **most appropriate strategy**, when considered against the reasonable alternatives, **based on proportionate evidence**;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' [our emphasis]

Sustainable Development

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:

*'a) plans should **positively seek opportunities** to meet the development needs of their area, and be **sufficiently flexible to adapt to rapid change**;*

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...' [our emphasis].

Efficient Use of Land

Paragraph 119 sets out the requirement for planning policies to promote an effective use of land in meeting the need for homes and other uses. Paragraph 120 goes on to state that planning policies should (inter alia):

*'a) encourage multiple benefits from both urban and rural land, **including through mixed use schemes** and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*

*c) give substantial weight to the value of using **suitable brownfield land within settlements for homes and other identified needs**, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*

*d) promote and **support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing** where land supply is constrained and **available sites could be used more effectively** (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*

*e) support opportunities to **use the airspace above** existing residential and **commercial premises for new homes**. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.' [our emphasis]*

Heritage

Section 16 of the NPPF provides the policy framework for heritage assets. Paragraph 190 states:

'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

*a) the desirability of sustaining and enhancing the significance of heritage assets, and **putting them to viable uses** consistent with their conservation;*

*b) the wider **social, cultural, economic and environmental benefits** that conservation of the historic environment can bring;*

*c) **the desirability of new development making a positive contribution to local character and distinctiveness**; and*

*d) **opportunities to draw on the contribution made by the historic environment to the character of a place**.' [our emphasis].*

Paragraph 192 states that local planning authorities should maintain or have access to a historic environment record, which should contain up-to-date evidence about the historic environment in their area and be used to (inter alia) assess the significance of heritage assets and the contribution they make to their environment.

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:

- Paragraph 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.
- Paragraph 195 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal, 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.
- Paragraph 197 states that in determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to **viable uses** consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their **economic vitality**; and
 - c) **the desirability of new development making a positive contribution to local character and distinctiveness.** [our emphasis].

Paragraphs 199 to 202 then provides a detailed framework for considering the potential impacts of a development on heritage assets through the decision-making process. In particular:

- Paragraph 200 states **any harm** to, or loss of, the significance of a **designated heritage asset** (from its alteration or destruction, or from development within its setting), should **require clear and convincing justification.** Substantial harm to Grade II listed buildings should be exceptional. [our emphasis].
- Paragraph 202 states that where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be **weighed against the public benefits** of the proposal [our emphasis].

London Plan (2021)

Optimisation of Previously Developed Land for Housing

Policy H1 of the 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):

- 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*
- c) ***housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.***

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.

Tall Buildings

Policy D9 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.

Heritage

Policy HC1 states that:

*'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:*

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) utilising the heritage significance of a site or area in the planning and design process*
- 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**.'*

*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 **identify enhancement opportunities** by integrating heritage considerations early on in the design process.'* [our emphasis].

PROPOSED ALTERATIONS TO DRAFT SITE ALLOCATION WT17

The adopted and emerging Wandsworth planning policy documents already recognised that the principle of alternative uses and 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, which in some places does not accord with national and regional (London Plan) policy. This representation proposes a number of alterations in 'tracked changes' style accordingly.

Paragraph 4.123

Paragraph 4.123 states:

'Mixed use development including residential, industrial and office uses with a new public square. Residential development above the existing bus garage could be permitted if transport functions would not be affected.'

Firstly, it is considered superfluous to discuss use classes at this point, as use classes for Sites WT14, WT15, and WT17 are considered later in the allocation in any case .

Notwithstanding, for the reasons set out later in this letter, it is considered that this sentence should make clear that leisure and retail uses could also be potentially acceptable in this location.

If reference to a public square is to be included, it would be helpful to make clear this is in relation to the land to the north of the cluster along Pier Terrace (as stated later at 4.125).

The second sentence implies that residential use at the WBG site would only be acceptable were the transport use retained, however that is not the case - as demonstrated at paragraph 4.124, residential use would also be appropriate as part of a mixed use scheme.

This part of the draft allocation is therefore considered to not be effective, as it could cause some confusion at the planning application stage.

Proposed Alteration 1:

*'Mixed use development including residential, industrial, and office, **leisure or retail** uses. ~~With Provision of~~ a new public square **to the north of the cluster along Pier Terrace**. Residential development ~~could~~ **would** be acceptable **at Wandsworth Bus Garage in principle, including** above the existing bus garage. ~~could be permitted if transport functions would not be affected.'~~*

Paragraph 4.123

Paragraph 4.124 states:

'At the Wandsworth Bus Garage site (WT17), proposals for mixed-use with residential development may be considered if a suitable alternative site for the bus garage could be provided.'

For the reasons set out earlier in this letter, the WBG site is surplus to requirements by TOT/RATP Dev, which is due to move operations in Q1 2023. It will therefore shortly represent a vacant site without any ongoing employment use.

Therefore, requiring the relocation of the bus garage to an alternative site is irrelevant, unjustified, and would pose an unnecessary planning constraint to any potential future use of the site.

RATP Dev is a private for profit bus company and as such there is no public service/benefit associated with the use.

It is also unclear why the site allocation only states that mixed use (with residential) 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. The list of potential land uses should also be consistent with those set out at 4.130 for the allocation to be effective.

Proposed Alteration 2:

*'At the Wandsworth Bus Garage site (WT17), proposals for mixed use **development including residential, industrial, office, leisure or retail uses** will be supported.'* ~~with residential development may be considered if a suitable alternative site for the bus garage could be provided.~~

Paragraph 4.124 continues:

'Alternatively, if it can be demonstrated that the requirements of the existing transport use remain unaffected, some residential development may be considered appropriate above the transport use if the development can protect and enhance the Grade II listed building.'

Firstly, for the reasons set out earlier in this letter, TOT/RATP Dev is vacating the site in the near future, and it is considered unlikely that any incoming purchaser would look to re-use the site for a transport use. Notwithstanding, we agree that residential development may be considered appropriate above a transport use in principle.

It is however, in our view unjustified to state that any development would need to protect and enhance the Grade II listed buildings. 'Protect and enhance' is vague wording, and it is unclear if this means that no harm could be caused to the heritage asset at all. We would therefore question the effectiveness of this wording.

Whilst clearly heritage matters would be a key consideration as part of any future development proposal, national, regional and local policy sets out a clear and established framework for considering these matters in detail. Notably, Paragraphs 200 - 202 of the NPPF allows less than substantial harm to the significance of a designated heritage asset, where this would be outweighed by the public benefits of a proposal.

The proposed wording set out here is therefore considered ineffective, unjustified, and contrary to NPPF Paragraph 200 - 202.

Proposed Alteration 3:

*'Alternatively, if it can be demonstrated that the requirements of the existing transport use remain unaffected, some residential development may be considered appropriate above the transport use ~~if the development can protect and enhance the Grade II listed building~~ **subject to heritage considerations.**'*

Paragraph 4.128

Paragraph 4.128 states:

'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. Measures to mitigate the impact of traffic noise would be required.'

This appears to indicate that residential accommodation at ground floor level fronting Marl Road would not be acceptable due to traffic noise. However, it is noted that allocations WT14 and WT17 (with the garage use removed) would transform Marl Road from a transport-dominated road to a street within a mixed use and low car use neighbourhood. Therefore, it is considered that, subject to noise assessments at the planning application stage, residential use could be appropriate on the Marl Road frontage at ground floor level (as is required for the upper levels in any case).

Proposed Alteration 4:

~~'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. Measures to mitigate the impact of traffic noise would be required.'~~

Paragraph 4.128 goes on to state:

'If a transport use is retained, the Wandsworth Bus Garage site (WT17) could include some limited additional floorspace that could be added above the western range of the building (which is largely workshop space). The proposal should 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. The extension must cause no harm to the significance of the structure as a Grade II listed building.'

In general, it is considered that this wording is excessively overprescribed for a site allocation. It places onerous restrictions on development potential of the WBG site, which would in any case be subject to rigorous scrutiny at planning application and listed building consent stage.

The above wording does not allow for the positive strategy for the conservation and enjoyment of the historic environment taking into account the desirability of new development making a positive contribution to local character and distinctiveness (NPPF Paragraph 190), nor does it allow for innovative and creative contextual architectural responses (London Plan Policy HC1(B)).

Stating that any extension must cause no harm to the setting of the structure as a Grade II listed building conflicts with NPPF Paragraphs 200 - 202, which allows some harm to the significance of a designated heritage asset, where this is outweighed by the public benefits of a proposal.

It is also unclear why the allocation indicates that only the western part of the building could be appropriate for this type of upward extension, as there does not appear to be any detailed heritage assessment of the WBG site within the Local Plan evidence base.

Overall, it is considered that this paragraph is overly restrictive, and does not add any value over and above Paragraph 4.124. We therefore suggest it is removed entirely.

Proposed Alteration 5:

~~'If a transport use is retained, the Wandsworth Bus Garage site (WT17) could include some limited additional floorspace that could be added above the western range of the building (which is largely workshop space). The proposal should 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. The extension must cause no harm to the significance of the structure as a Grade II listed building.'~~

Paragraph 4.130

Paragraph 4.130 states:

'Development should not harm the setting of the adjacent listed Bus Garage site (WT17). Sensitive infill development and intensification adjacent to the listed building could be possible. Subject to ongoing operation of the current occupier, proposals to rejuvenate the bus garage for leisure or flexible workspace should be considered.'

In respect of this first sentence, the wording should be amended to reflect NPPF Paragraphs 200 - 202, as presently it conflicts with this policy. The grade II listed building is within close proximity to other draft site allocations, notably WT14 and WT15 within a tall building zone TB-G1d-03 where buildings of between 7 to 15 storeys would be appropriate. Realistically, such development would likely result in some harm to the setting of the listed building (notwithstanding the actual allocation for WBG itself). As currently worded, this paragraph would therefore conflict with the potential for allocations WT14, WT15, and WT17 to be delivered, so is not considered to be effective or justified.

TOT/RATPDev supports the recognition that sensitive infill development and intensification adjacent to the listed building could be possible.

In respect of the last paragraph, we reiterate that TOT/RATP Dev are due to vacate the WBG site in the near future, and so the 'operation of the current occupier' is not relevant. In respect of potential alternative uses, we believe that the site could be appropriate for a range of uses, including leisure, retail, office, self storage, or flexible workspace. In addition, the potential for residential use (as part of a mixed use scheme) at the WBG has already been established at Paragraphs 4.123 and 4.124.

It is also unclear how this last sentence (and specifically the word 'should') would be applied to the determination of a planning application. It is held that 'could' would provide more appropriate wording, to reflect the range of potentially appropriate land uses. It is held that this approach would be consistent with NPPF Paragraphs 190 and 197 which states that in preparing development plans and in determining applications, local planning authorities should take account of economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.

Proposed Alteration 6:

~~'Development should not harm the setting of the adjacent listed Bus Garage site (WT17). Sensitive infill development and intensification adjacent to the listed building could be possible. Subject to ongoing operation of the current occupier, proposals to rejuvenate the bus garage for leisure or flexible workspace, or retail uses should be considered.'~~
subject to heritage considerations. Subject to ongoing operation of the current occupier, proposals to rejuvenate the bus garage for will be supported. Mixed use development with residential, leisure, industrial, office, or flexible workspace, or retail uses should be considered.'

CLOSINGS

We trust that the above provides informative comments to the current consultation.

We would be grateful if you could please confirm safe receipt of these representation and for above comments to be considered before the revised Local Plan is finalised and submitted.

In addition, we request to be kept informed on the Examination proceedings and reserve the ability to take part in any Examination Hearings on behalf of TOT / RATPDev, or any subsequent WBG landowner.

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 merits of the proposal in detail.



Yours faithfully,



John Cutler
Associate Planning Director
National Planning and Development



Appendix 1 – The Original Tour Letter

Planning Policy
London Borough of Wandsworth
Town Hall
Wandsworth High Street
London
SW18 2PU

Email: planningpolicy@wandsworth.gov.uk

23 February 2022

Dear Sirs,

Wandsworth Local Plan Review (Regulation 19) 2022

Representations submitted on behalf of The Original Tour – Wandsworth Bus Garage (WBG)

On behalf of The Original Tour ('TOT') and RATPDev we write to confirm that Wandsworth Bus Garage is being relocated. This letter has been written to support the work being undertaken by BNP Paribas Real Estate, on our behalf, in response to the Council's Local Plan Review (Regulation 19).

Relocation of Wandsworth Bus Garage – Site Surplus to Requirements by TOT/RATP Dev.

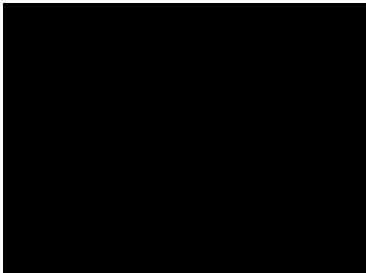
- The site is in private ownership and operates a private bus service.
- The Original Tour (TOT) is a bus operator and a subsidiary of RATPDev, a private transportation company based in France but operating across Europe and beyond.
- The Covid-19 pandemic has had significant implications on the operations at WBG given the change in tourist activities over the last two years. Therefore, TOT and RATPDev have reviewed their operations and made the decision to relocate to other premises.
- The relocation strategy has been confirmed. TOT intend to vacate the site in Q1 2023.
- The site is deemed no longer fit for purpose and the cost of upgrading the garage to meet modern standards make the site unviable, therefore the site is surplus to operational requirements by TOT/RATP Dev.

RATP GROUP

Registered Office
RATP Dev
Busways House
Wellington Road
Twickenham
Middlesex TW2 5NX
Registered number 2328599 England
VAT No 198 1537 69

We trust that the above provides informative comments to the current consultation.

Yours faithfully



Arnaud Masson
RATP Dev



Appendix 2 - Historic England Listing



WANDSWORTH GARAGE BUS DEPOT (LONDON TRANSPORT EXECUTIVE)

Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1184233

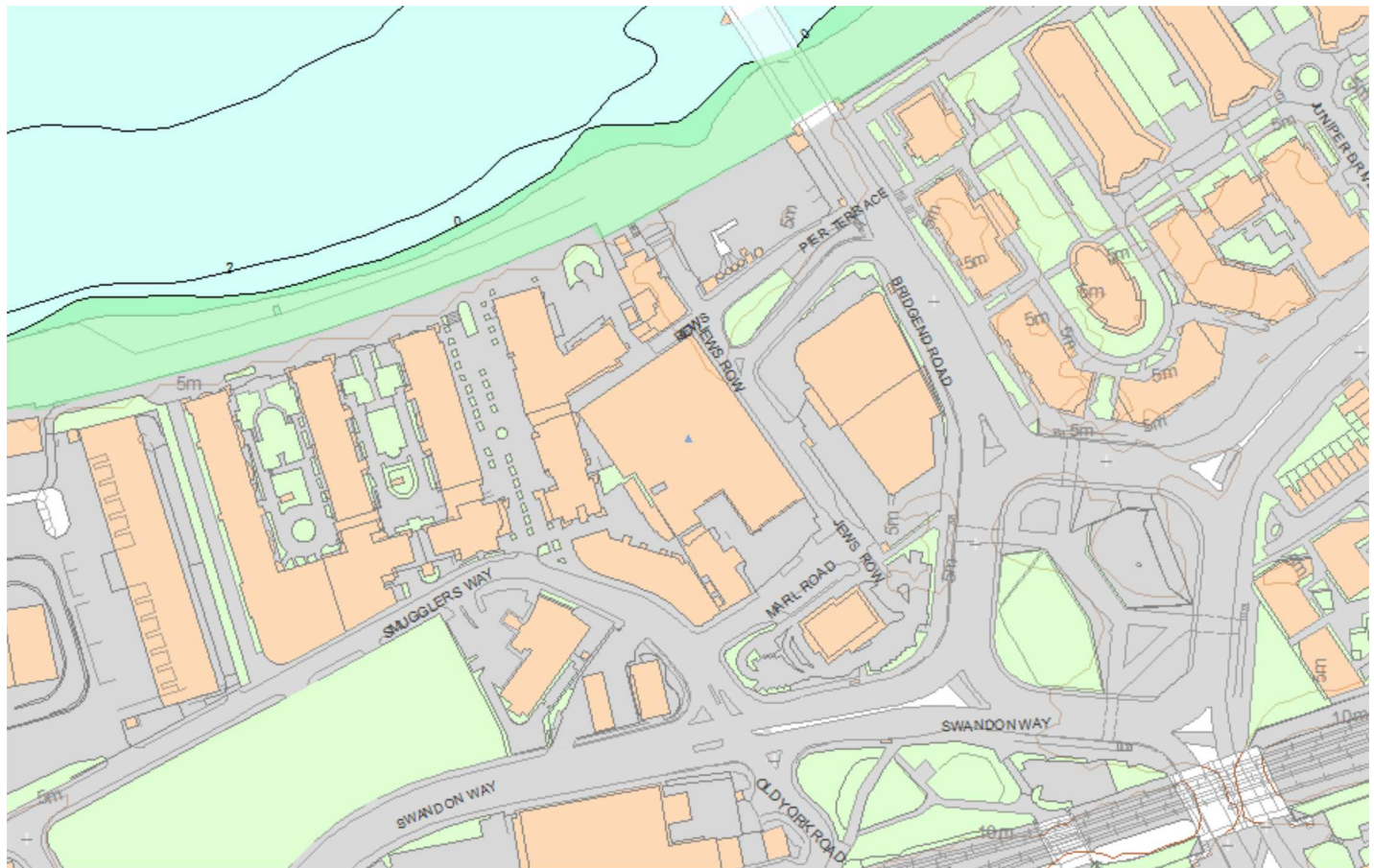
Date first listed:

07-Apr-1983

Statutory Address:

WANDSWORTH GARAGE BUS DEPOT (LONDON TRANSPORT EXECUTIVE), JEWS ROW
SW18

Map



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The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - [1184233.pdf](#)

(http://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/171664/HLE_A4L_Grade|HLE_A3L_Grade.pdf)

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

This copy shows the entry on 22-Feb-2021 at 11:16:06.

Location

Statutory Address:

WANDSWORTH GARAGE BUS DEPOT (LONDON TRANSPORT EXECUTIVE), JEWS ROW
SW18

The building or site itself may lie within the boundary of more than one authority.

County:

Greater London Authority

District:

Wandsworth (London Borough)

National Grid Reference:

TQ 25975 75335

Details

JEWS ROW SW18 1. 5033 Wandsworth Garage Bus Depot (London Transport Executive) TQ 27NE 2/7 II 2. To west of Wandsworth Bridge 1906-8 tramway depot of yellow stock brick with sparing stone dressings. The entrance elevation is altered. The rear elevation is of 2 gabled bays, each gable recessed behind lesenes which frame a large thermal window. The stone cills line through with those of the long return elevation to give the effect of a bandcourse, the windows above lying high in the wall. The return elevation comprises a centre block articulated by 3 large, blind round-headed windows recessed behind lesenes and also end blocks each articulated by a blind thermal window recessed behind lesenes. The centre and end blocks frame 2 recessed ranges, each carrying a colonnade of lesenes framing in its upper part 6 further recessed segmental-headed and glazed windows.

Listing NGR: TQ2597575335

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

207055

Legacy System:

LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

Don't have an account? Register [here](https://account.historicengland.org.uk/sign-in) (<https://account.historicengland.org.uk/sign-in>)

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Local Plan Review

Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr
First name		John
Last name		Cutler
Job title (where relevant)		
Organisation (where relevant)	The Original Tour / RATPDev	BNP Paribas Real Estate
Address		5 Aldermanbury Sq London
Postcode		EC2V 7BP
Telephone		██████████
E-mail address		██

*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you run a business in the borough?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:
www.wandsworth.gov.uk/privacy

Part C: Your Response		
4. Do you consider the Local Plan is:		
4.1 Legally compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the duty to co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.		
If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.		
5. Do you think the Local Plan is <u>unsound</u> because it is <u>not</u>: <i>(Please tick all that apply)</i>		
5.1 Positively prepared	<input type="checkbox"/>	
5.2 Justified	<input checked="" type="checkbox"/>	
5.3 Effective	<input checked="" type="checkbox"/>	
5.4 Consistent with national policy	<input checked="" type="checkbox"/>	
6. Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.		
Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.		
If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.		
<i>Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.</i>		
Please refer to attached letter.		
<i>Please continue on a separate sheet / expand the box if necessary.</i>		

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 5 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please refer to attached letter.

Please continue on a separate sheet / expand the box if necessary.

8. If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

The draft allocation includes detailed elements which merit discussion.

Please continue on a separate sheet / expand the box if necessary.

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:
For electronic responses a typed signature is acceptable.

John Cutler

Date:

25 February 2022



Local Plan Publication Consultation

Guidance Notes to accompany the Representation Form

Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

5. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

6. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

General advice

7. If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

8. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

9. Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

10. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.