



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		
First name	Tony	
Last name	Burton	
Job title (where relevant)	Chair	
Organisation (where relevant)	Wandle Valley Forum	
Address		
Postcode		
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 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 checked="" 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 unsound because it is not:
(Please tick all that apply)

5.1 Positively prepared	<input checked="" type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input 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.

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.

See representations

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

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.

See representations

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.

To ensure a full understanding of our representations

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:

Tony Burton

For electronic responses a typed signature is acceptable.

Date:

28/2/22



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.



WANDSWORTH LOCAL PLAN (Regulation 19)
A submission by Wandle Valley Forum to London Borough of Wandsworth

February 2022

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.
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.
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.

Overall approach

4. There is much to welcome in the Local Plan and its treatment of the Wandle Valley. We particularly welcome explicit recognition of the Wandle Valley in the Wandle Valley Area Strategy and Wandsworth Town Area Strategy but more needs to be done to make the Wandle more of a centrepiece of the new Wandsworth Local Plan. The strategic opportunity provided by the Wandle is addressed in only a limited way by 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 and the river is not included in the Key Diagram. For the reasons provided in these representations we do not consider the Wandsworth Local Plan to be sound.
5. We raised a significant number of issues and opportunities for strengthening treatment of the Wandle Valley in representations on the earlier draft Local Plan. It is disappointing that so few have been taken on board. It is also of concern that our representations went unacknowledged and were absent from the summary of representations and Statement of Consultation when the revised Plan was published. This was rectified when we raised the issue but this also demonstrated the very limited way in which our representations have been considered.

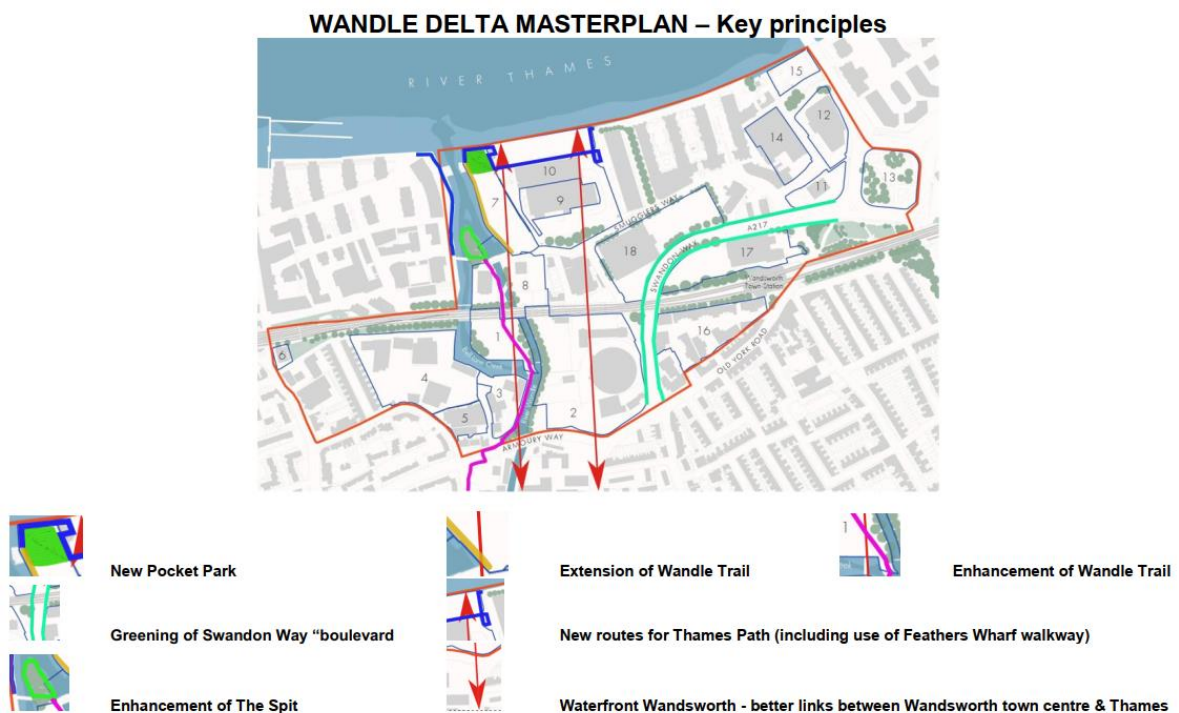
6. It appears to be Wandsworth Council's view that the Wandle is adequately addressed in the Plan, its Area Strategies and the Wandle Delta Masterplan. This attention is welcome but we believe the rest of the Wandle should also be the focus of its own Masterplan and this will support delivery of Area Strategy PM10 Wandle Valley. This Masterplan should be identified in Policy SDS1.

7. 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.

Area Strategy – Wandsworth Town

8. 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).

9. 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).



The Masterplan should also be guided by the [Wandle Valley Forum Charter](#) setting out the Wandle community's priorities for the future of the Wandle Valley.

10. 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 require the creation 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 should demonstrate how the opportunities provided by the Wandsworth Gyratory proposals have been maximised in terms of enhancing connectivity"* so they should demonstrate how they have taken 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 Map 4.1 for Wandsworth Town Centre. Both the Policy and the Key Diagram should also explicitly reference the need to enhance The Spit.

11. 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). The Plan repeats the previously highlighted error in paragraph 4.94 of locating this to the west and not the east of the Wandle. The provisions for extending the Wandle Trail and providing a public route to the high level bridge 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.

12. 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 LP52 B and be supported by similar text to that supporting a riverside walk along the Thames (paragraph 20.41). We commend the pedestrian priority and approach developed for towpaths by the [Canal and River Trust](#).

13. 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 than “*opportunities should be explored*” (paragraph 4.159) in a revised site allocation which explicitly promotes daylighting of the Wandle. This would be consistent with London Plan Policy SI 17.

14. 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) (PM2 A 6.) or Policy PM9 relating to Wandsworth’s Riverside. Nor is it included in Map 4.1 of Wandsworth Town or Map 11.1 of Wandsworth’s Riverside although this does include a similar vista looking south across Wandsworth Bridge. 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 RTPI’s Excellence in Plan Making Practice award and the Landscape Institute’s Award for Landscape Policy and Research.



Area Strategy – Wandle Valley

15. 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 Local Plan Projects on the borough boundary.

16. We believe Policy PM10 can be strengthened by:

- 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 LP55 – and to support improvements to the quality and quantity of open space not just avoid a reduction
- Addressing the need for work on the Wandle to contribute to naturalising the way it functions, as supported by London Plan Policy SI17 and the Wandle Catchment Management Plan
- Requiring pedestrian priority in any plans for improving permeability and access along and across the river for active travel
- Recognising the role of both Wandle Valley Forum and Wandle Trust (SE Rivers Trust) as well as Wandle Valley Regional Park Trust in supporting and delivering change and providing partnership – both these organisations are currently more actively engaged on the Wandle than the Regional Park Trust
- 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
- Requiring development to create more opportunities for local people to manage and run buildings and open spaces along the Wandle

17. We believe the Area Framework needs to be supported by:

- A Masterplan for the Wandle Valley to support delivery of the Area Strategy in the same way as is being provided for Wandsworth Town
- Acknowledging the complementary priority to be attached to delivery of the Wandle Valley's Catchment Management Plan
- 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 A 8.
- 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



*Boundary of Wandle Valley Regional Park
in All London Green Grid*

Neighbourhood plans

18. Fewer than one third of the Plan's 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 and Beddington Corner which has a completed neighbourhood plan. This will require stronger support from Wandsworth Council to be realised.

19. We look forward to being kept involved in the Plan's progress.