

Planning Policy
Environment and Community Services
Town Hall
Wandsworth High Street
London
SW18 2PU

28 February 2022

Dear Sir/ Madam,

Consultation on the Draft Local Plan: Publication Version | Southside Limited Partnership

Background

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 Draft Local Plan: Publication Version (Regulation 19).

These representations follow on from the representations submitted on behalf of Southside Limited Partnership on the 'Pre-Publication' Draft Local Plan (Regulation 18) consultation, in March 2021. However, in accordance with national guidance, these representations focus on the Draft Local Plan's legal and procedural compliance, including the 'soundness' of the plan. Where relevant, reference is made to the four different tests of soundness, which require the Local Plan to be:

- Positively prepared - it provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities;
- Justified - it is based on an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;
- Effective - it is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy - to enable to delivery of sustainable development.

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. 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.

Southside occupies 5.78 hectares of Wandsworth 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, Gravity Active Entertainment 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.

Priorities & Objectives

As set out in the March 2021 representations, our client's 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. In doing so, there will be an opportunity to deliver significant long-term, local community benefits to Wandsworth.

Given Southside's highly accessible, sustainable and urban location, it is considered that the site has 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 welcome the opportunity to comment on the Draft Local Plan: Publication Version (Regulation 19) as a key stakeholder within the area. We support the strategic vision of the Local Plan and in particular, the policies that seek to support 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 to support continued growth and adaptation in this location.

These representations begin by focusing on the Site Allocation for Southside, as set out on Pages 93-95 of the Draft Local Plan. We then comment on some of the more general policies set out in the Draft Local Plan. In accordance with paragraph 35 of the NPPF, these representations consider whether the Draft Local Plan has been prepared in accordance with legal and procedural requirements, and whether the policies are sound.

Site Allocation – W20 Southside Shopping Centre

The following table sets out the relevant policy extracts, as well as our representations.

WT20 Southside Shopping Centre, Wandsworth High Street, SW18		
	Draft Local Plan: Publication Version (Regulation 19)	Representation
4.158 Site Description	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. Site Area: 5.39ha.	<ul style="list-style-type: none"> i. This site description is appropriate and reflects the land title ownership. However, the full extent of the site ownership extends to 5.78ha and this should be updated. ii. We support the extension to the policies map site allocation boundary to include the southern portion of Southside.
4.159 Site Allocation	<p>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 (including those supporting the night-time economy), and other town centre uses, including social infrastructure and community facilities to support the local community.</p> <p>Development proposals for Southside should support the creation of improved links between King George’s Park and Garratt Lane and improve the Centre’s relationship with the public realm through enhancements to the pedestrian environment and improvements which integrate it with the Ram Brewery complex. Opportunities should be explored to articulate the location of the culverted River Wandle by opening up access to the river.</p>	<ul style="list-style-type: none"> iii. Adapting to the changing market is key to the long-term success of Southside as a town centre location. 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 our existing retail spaces need to adapt to remain relevant as attractive places for people to spend time. Planning policy must allow sufficient flexibility to respond to these changing market conditions. iv. We are supportive of the re-wording of the site allocation, which is supportive of flexible retail, leisure, residential and other town centre uses.

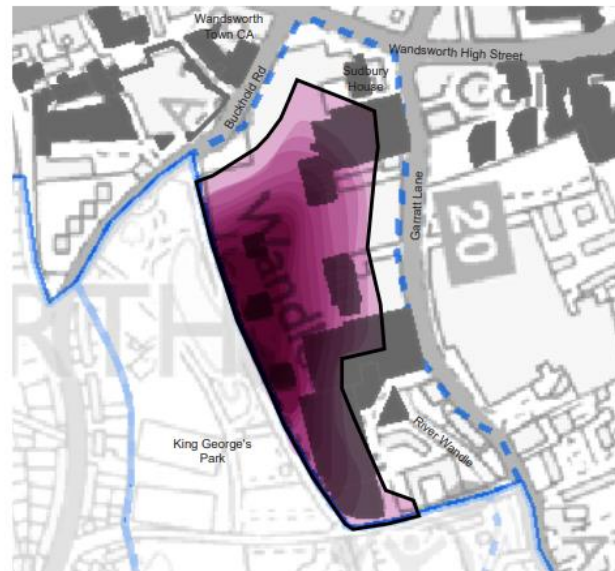
<p>4.160 Development Considerations - Uses</p>	<ul style="list-style-type: none"> • Enhancing Southside’s retail and leisure offer through appropriate adaptation and/or through its redevelopment. Flexible retail, leisure and other town centre uses should be supported to ensure the town centre is capable of responding to the changing nature of retailing and working, and where it can be demonstrated that a proposal will not negatively impact the vitality and viability of the town centre. • Improvements to the existing leisure offer including food, beverage and entertainment uses, supporting the evening and night-time economy. • Improvements to the existing residential environment should be explored. Opportunities for additional residential accommodation is appropriate within this sustainable town centre location. • Improve social infrastructure and community facilities to support the local community. 	<p>v. We are supportive of the development considerations set out in this site allocation and feel the land uses identified will assist in ensuring the long-term success of Southside.</p> <p>vi. It is noted that the site allocation has been amended to remove the word ‘inclusive’ and this is supported.</p> <p>vii. We are supportive of the flexible approach to retail space. This is important to support the long-term success of the Town Centre.</p> <p>viii. We request that the development considerations are also accepting of the comprehensive redevelopment of the site, should this be required in order to facilitate development opportunities in the long-term, whilst supporting Southside as a town centre location.</p>
<p>4.161 Design Requirements – Built Form</p>	<ul style="list-style-type: none"> • Development 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 and the regeneration of the Ram Quarter. This public space will provide a key focal point for the town centre. 	<p>ix. We are generally supportive of this design requirement and would seek to provide enhanced public realm and active ground floor uses as a component of any future redevelopment proposal.</p> <p>x. It should be clarified within the policy text that the requirement to provide a new public square within the site will only be required where it is commensurate to the scale of development proposed, for example through large scale, comprehensive redevelopment. Therefore, the following amendment to the wording is recommended:</p>

		<p><i>“Development should respond positively to the site’s proximity to King George’s Park through improved public realm and creation of active ground floor uses. Where commensurate to the scale of development proposed, 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.”</i></p>
	<ul style="list-style-type: none"> • 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 retail, including that currently played by the shopping centre, to support the local community and the wider area. 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>xi. Active frontages are vital to successful placemaking and we are supportive of the principle of this design requirement.</p> <p>xii. It is important that this policy does not stifle potential future redevelopment of Southside, to provide alternative active, outward facing town centre uses across the site. We recognise that, as suggested in our previous representations, an amendment has been made to reflect the distinction between the primary frontages of Garratt Lane and Wandsworth High Street, and the existing internal frontages of the Shopping Centre.</p>
	<ul style="list-style-type: none"> • 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. New development 	<p>xiii. 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>

	<p>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>xiv. 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 (Sudbury House, for example, extends to 70.85m in height), so the introduction of further tall buildings here will not fundamentally change the character of the area, or detrimentally impact the townscape (please refer to paragraphs xix to xxi below).</p>
<p>4.162 Movement</p>	<ul style="list-style-type: none"> 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>xv. 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, as, the planning benefit should be commensurate with the achievable scale of development.</p>
	<ul style="list-style-type: none"> An increase in the width of the pavement along Garratt Lane will be sought in order to provide for an improved active travel 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>xvi. We are supportive of improvements to the pedestrian environment and would seek to improve links to neighbouring streets as part of any future redevelopment opportunity. However, in accordance with national policy, consideration should be awarded to the likely deliverability of pavement widening along a key route on the gyratory system. The policy should therefore be amended to clarify that an increase in pavement width should be sought, "if possible".</p>

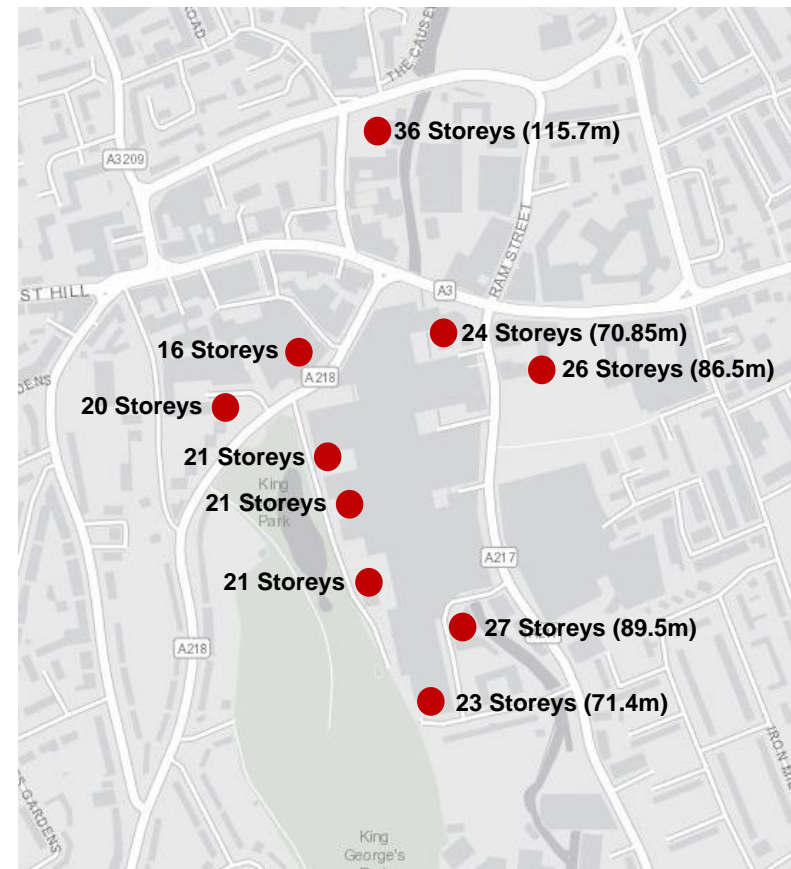
		xvii. The planning benefit should be commensurate with the achievable scale of development.
4.163 Context	<ul style="list-style-type: none"> Development should maximise opportunities to enhance the living conditions of existing and future residents within and adjacent to the site. This could include opportunities to make better use of roof areas for amenity space designed for all year-round use. Opportunities to provide some publicly 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. 	xviii. We are supportive of this requirement and would seek to improve the living conditions of existing and future residents as part of any future comprehensive redevelopment proposal; this would include the appropriate provision of both private and public amenity space.
4.164 Building Heights	<ul style="list-style-type: none"> In accordance with the tall building maps in Appendix 2, part of the site is located in tall building zone TB-G1a-01. The maximum appropriate height range for the zone is 7 to 20 storeys, and the appropriate height range for the site must be in accordance with the tall building maps in Appendix 2. The height of developments within that zone should not exceed the heights of, and be in accordance with, the tall building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for tall buildings or mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings). 	<p>xix. We are supportive of Southside being identified as an area with opportunities for tall buildings. However, we question the appropriateness of only part of the site being identified, as the approach does not seem to take into account the existing tall buildings to the north of the site where buildings extend to 70.85m in height (Sudbury House), and where the site is most connected to public transport.</p> <p>xx. Further, there are tall buildings immediately to the north of the site including one (outside of the land ownership boundary) with planning permission for 36 storeys (Ram Brewery). Therefore, the introduction of further tall buildings here will not introduce new elements that fundamentally change the character of this area.</p> <p>xxi. The image shown below on page 8 indicates the built and consented tall buildings on the site and in the immediate</p>

TB-G1a-01



Existing prevailing height: 3-20+ storeys
Appropriate height: 7-20 storeys (21-60m)

vicinity. It is clear that a number of these tall buildings have not been taken into account within the urban design analysis and subsequent heat map (which is also set out on page 8). The proposed 20 storey maximum has not taken into account the existing environment and is unreasonably restricting in a location suitable for tall buildings.



		<p>xxii. In addition, we do not believe the inclusion of a cap on tall building heights is in accordance with the London Plan. The policy is inflexible and in its current format, precludes taller buildings irrespective of appropriate justification, such as the facilitation of regeneration opportunities.</p> <p>xxiii. As emphasised in the London Plan, tall buildings can facilitate regeneration opportunities, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. The London Plan recognises that tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. We do not feel this approach is reflected in the current Draft Local Plan. In order to be consistent with London Plan policy, we request that the approach to tall buildings is applied flexibly here, taking into consideration the way in which tall buildings can facilitate regeneration opportunities, contributing to new homes and economic growth.</p> <p>xxiv. In addition, the urban design analysis undertaken to inform this policy has not taken into account influential external factors such as Daylight, Sunlight and Overshadowing and the fact that there are already tall buildings on the site. Given a full analysis is yet to be undertaken makes it apparent that applying cap heights in this location, almost certainly rendering any redevelopment proposal unviable, would be highly inappropriate at this stage.</p>
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		<p>xxv. As such, we request that the heights identified within the relevant policies are used as a guide in these locations. This would be in line with the approach taken by other London boroughs where the Local Plan has recently been adopted.</p>
	<ul style="list-style-type: none"> In accordance with the mid-rise building maps in Appendix 2, part of the site is located in mid-rise building zone MB-G1a-01 (which acts as a transition zone to tall building zone TB-G1a-01) and the maximum appropriate height for the zone is 5 storeys. The height of developments within that zone should not exceed the heights of, and be in accordance with, the mid-rise building maps in Appendix 2, which set out the identified maximum appropriate heights in line with Policy LP4. Development proposals for mid-rise buildings will only be appropriate within the identified zone where they address the requirements of Policy LP4 (Tall and Mid-rise Buildings). 	<p>xxvi. As noted in paragraphs xxii to xxv, we do not believe that the application of a building height cap is in accordance with the London Plan. The policy is inflexible and in its current format, precludes taller buildings irrespective of appropriate justification, such as the facilitation of regeneration opportunities.</p> <p>xxvii. In addition, the urban design analysis undertaken to inform this policy has not taken into account influential external factors such as Daylight, Sunlight and Overshadowing and the fact that there are already tall buildings on the site. Given a full analysis is yet to be undertaken makes it apparent that applying cap heights in this location, almost certainly rendering any redevelopment proposal unviable, would be highly inappropriate at this stage. The policy wording should be amended to allow for consideration of factors when determining maximum building heights.</p> <p>xxviii. Furthermore, Policy D3 of the London Plan states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The London Plan states that where these locations have existing areas of high density buildings, expansion of the areas should be positively</p>

		<p>considered by Boroughs where appropriate. We would question, therefore, the appropriateness of applying the mid-rise policy to the north of the site, where there is greatest connection to jobs, services and infrastructure, and where there are existing tall buildings.</p> <p>xxix. The proposed approach to define mid-rise buildings reflects a new approach and methodology in informing the tall buildings policy. As such, it is considered that further consultation on this draft policy is undertaken prior to adopting the Local Plan.</p>
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General Policies

Policy	Representation
<p>Policy PM2 Wandsworth Town</p>	<p>xxx. We are supportive of the principle 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>xxxi. 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 Gyrary System and supporting public realm improvements.</p>
<p>Policy LP4 Tall and Mid-rise Buildings</p>	<p>xxxii. Policy LP4 identifies locations suitable for tall buildings in Appendix 2. We are supportive of Southside being identified as an area with opportunities for tall buildings.</p> <p>xxxiii. We wish to express concern towards part D of Policy LP4, which states that “proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this Plan. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless</p>

	<p>it can be clearly demonstrated that this would not result in any adverse impacts including on the character and appearance of the local area”.</p> <p>xxxiv. As noted in paragraphs xxvi to xxix, we do not believe that the application of a building height cap is compliant with the approach encouraged by the London Plan. The policy is inflexible and in its current format, precludes taller buildings irrespective of appropriate justification, such as the facilitation of regeneration opportunities. It is essential that there is sufficient flexibility within policy to consider the potentially far-reaching benefits of regeneration, including through improvements to existing housing stock for example.</p> <p>xxxv. To be consistent with London Plan policy, we request that the approach to tall buildings takes into consideration the way in which tall buildings can facilitate regeneration opportunities, contributing to new homes and economic growth, particularly in order to make optimal use of sites. It may be appropriate for the heights currently proposed within the Draft Local Plan to be considered as a guide for developments, however, it is not appropriate to apply a height cap, immediately disregarding the wider site specific considerations outlined above. The policy wording should be changed accordingly.</p> <p>xxxvi. In addition, the urban design analysis undertaken to inform this policy has not taken into account influential external factors such as Daylight, Sunlight and Overshadowing and the fact that there are already tall buildings on the site (please refer to paragraphs xxii to xxv). 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 damaging at this stage.</p> <p>xxvii. Furthermore, Policy D3 of the London Plan states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. The London Plan states that where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. We would question, therefore, the appropriateness of applying the mid-rise policy to the north of the site, where there is greatest connection to jobs, services and infrastructure, and where there are existing tall buildings.</p> <p>xxviii. The proposed approach to define mid-rise buildings reflects a new approach and methodology in informing the tall buildings policy. As such, it is considered that further consultation on this draft policy is undertaken prior to adopting the Local Plan.</p>
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<p>Policy LP23 Affordable Housing</p>	<p>xxxix. 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 awarded to site context, local housing need and viability when determining the appropriate provision, as well as the benefits of regeneration.</p> <p>xl. It is noted that the 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 the London Plan, to incentivise the delivery of larger affordable homes where appropriate.</p> <p>xli. It is recognised that Policy LP23 has been amended to limit the requirement for viability evidence to those circumstances which are specified in the London Plan and to measure affordable housing in habitable rooms.</p>
<p>Policy LP24 Housing Mix</p>	<p>xlii. We are supportive of mixed and balanced communities; however, 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.</p> <p>xliii. We acknowledge that the Local Plan Consultation Statement clarifies that this policy will be applied flexibly to ensure the schemes appropriately respond to the specific circumstances of the site.</p> <p>xliv. It is also acknowledged that the policy has been updated to take into account current evidence in relation to housing need. This is supported.</p> <p>xlv. 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 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.</p>

<p>Policy LP30 Build to Rent</p>	<p>xlvi. 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, considering the factors set out in Policy LP24 whilst also acknowledging that Build-to-Rent schemes are best suited to smaller unit sizes (as confirmed in of the GLA’s SPG).</p> <p>xlvii. 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 Rented or Living Rent housing) and to enhance equality and inclusiveness through integration of housing types. 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 polices of which were developed following extensive consultation with the Build to-Rent development and investment industry). 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 that equivalent to London Living Rents.</p> <p>xlviii. Policy should include flexibility for the range of discounts to be agreed on a site-by-site basis, considering the factors set out in Policy LP24. 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. As currently reflected, the affordable housing requirements set out in Draft Policy LP30 would have a larger financial cost than those required for higher value private sale by Policy LP24. 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>
<p>Policy LP42 Development in Centre</p>	<p>xlix. We are supportive of Southside’s allocation as a Core frontage, whereby proposals for new retail uses and active frontages. We are supportive of the amendment to permit a greater degree of flexibility over the use of retail units in core and secondary frontages. We believe in the long-term success of retail, however, where part F.3 suggests conditions may be applied to planning permission to restrict specific uses, it should be noted that this should be subject to demand and commercial viability.</p>

	<p>I. We are broadly supportive of the proposed policy wording. We are supportive of part D 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.</p>
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Summary

We welcome the opportunity to comment on the Draft Local Plan Publication Version (Regulation 19) as a key stakeholder within the area.

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 Draft Local Plan proposed are considered critical to the successful future of Southside and thereby the continued economic growth and long-term sustainability of Wandsworth Town.

We would be happy to discuss these representations in more detail with LBW at an appropriate time.

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 [REDACTED] or my colleague Louisa Smith on [REDACTED]

Yours faithfully,



Partner

On behalf of Montagu Evans



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

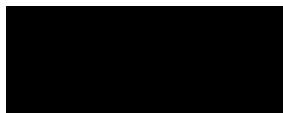





Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

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	Ms	Mr
First name	Janet	Guy
Last name	Kidner	Bransby
Job title (where relevant)	Development Director	Partner
Organisation (where relevant)	Landsec Ltd	Montagu Evans
Address		70 St Mary Axe London
Postcode		EC3A 8BE
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 checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>	
5.2 Justified	<input checked="" type="checkbox"/>	
5.3 Effective	<input 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 supporting Covering Letter, prepared on behalf of Southside Limited Partnership, enclosed within this submission.		

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.

Please refer to supporting Covering Letter, prepared on behalf of Southside Limited Partnership, enclosed within this submission.

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.

Please refer to supporting Covering Letter.

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

Guy Bransby

Date:

28 February 2022

<i>typed signature is acceptable.</i>			
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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.