

Wandsworth Draft Local Plan Consultation (Regulation 19)

Thank you for the further opportunity to comment on the draft Local Plan. South West London Clinical Commissioning Group (SWL CCG) responded to the previous Regulation 18 consultation in March 2021. Representations were also submitted on behalf of St George's University Hospitals NHS Foundation Trust and by NHS Property Services and the CCG response referred to those representations.

We note that under the legal Duty to Cooperate the London Borough of Wandsworth should engage and work collaboratively with prescribed bodies, such as the CCG, to draft the Local Plan. The Duty to Co-operate Statement (January 2022) correctly identifies that engagement and collaboration has taken place, including discussions at the Wandsworth Borough (Health and Care) Estates Group, communication with St George's University Hospitals NHS Foundation Trust on site allocations and presentations to the Health and Wellbeing Board.

We note that the representations received to the Regulation 18 stage and Council's response have been published in a Statement of Consultation Report (January 2022). We note that the Council has responded positively to the CCG's comments, but we set out some further comments and observations.

Spatial Vision and Strategic Objectives

We support the references in the vision (pages 20-22) to health and wellbeing and working with key partners, such as the NHS to invest in public services (13th bullet point) and supporting healthy lifestyles (20th bullet point).

We welcome the change to Social Objective No 7 which seeks to ensure the creation of healthy environments and developments ensuring there is an appropriate range of health and care facilities that meet local needs and support service transformation.

Spatial Strategy

We are pleased to see that health and wellbeing forms part of the spatial strategy. In addition to the NHS Long Term Plan, paragraph 2.100 now refers to Wandsworth Health and Care Plan and the wider service and estate plans for the emerging South West London Integrated Care System and Integrated Care Board (SWL ICB).

Paragraph 2.102 refers to the potential health and wellbeing benefits from development. However, development can also have negative impacts if not well designed and managed. We note that paragraph 2.64 refers to the need to ensure that environmental impacts of development do not lead to detrimental effects on peoples' health. We suggest that the paragraph 2.102 refers to the use of health impact assessments (as required under Policy LP15).

Amend the first sentence to read: The quality of the built and natural environment can have a significant impact on health and well-being and the use of health impact assessments can help ensure that the impact of new development is addressed.

We welcome the change to Policy SDS1 Spatial Development Strategy with the inclusion of housing capacity figures for 2023 – 2038 for each of the Area Strategies and on allocated sites outside of these areas, and on small sites across the borough. We note that Policy LP24 Provision of New Homes in the Regulation 18 version has been deleted. This policy and Table 17.2 provided 5- and 10-year supply figures. Given that 87% of capacity is the first 10 years of the plan (by 2032/2033), this information is helpful.

Indeed the B. 1 'Inclusive Growth' clause of the area strategy policies provide 10-year housing capacity figures. It would be helpful if the Policy Table 2.2 New Home Distribution as part of Policy SDS1 included 10-year housing capacity figures to match the figures in the area strategy policies.

Infrastructure Delivery Plan

We welcome the new clause H in Policy SDS1 Spatial Development Strategy which requires development proposals to demonstrate that they accord with infrastructure requirements established through the Infrastructure Delivery Plan and all other policies of the Local Plan.

We note that an updated Infrastructure Delivery Plan (January 2022) has been published as part of the consultation. It includes a review of health infrastructure, a description of planned health Infrastructure provision in Nine Elms and health projects and requirements set out in an Infrastructure Delivery Schedule. The list requires further additions and amendments which are set out in this response. A characteristic of the health estate in Wandsworth is that much of it is provided by Primary Care General Practices in privately owned premises. Further upgrades, expansion or relocation of these premises will be required to support the C.4 People First policy.

The Infrastructure Delivery Schedule groups the location of health projects into Nine Elms or 'Wider Wandsworth'. It is essential that, for those projects in Wider Wandsworth, that the relevant Area Strategy is indicated to identify that new and improved health facilities are being planned in different growth areas of the borough. In addition, where a health project is to be delivered within a site allocation it is essential that is indicated.

The CCG would welcome the opportunity to update the Infrastructure Delivery Plan to revise healthcare requirements in response to the housing capacity figures set out in the plan and to identify deficiencies and gaps in provision where additional investment may be needed. This commitment is set out in LP17 Social and Community Infrastructure clause A 3. This includes the expansion of capacity in response to service change, particularly regarding Primary Care Networks in the borough. The requirements for future floorspace due to the impact of service changes, housing development and population growth on the Primary Care Networks (PCN)s, taking into account existing space deficiencies, is shown in Appendix 1. Appendix 1 identifies a requirement for a further 9,959 sqm of Primary Care space across the borough during the plan period.

Primary care space

Requirement	Current space deficit sqm	Housing led growth space sqm	Total additional floor space sqm
Primary Care networks	6600sqm	3360sqm	9959sqm

Area Strategies and Site Allocations

The Area Strategies include a Place Performance diagram. It includes an assessment of 'health' which has been informed by strategies, such as the Health and Wellbeing Strategy and by consultation with stakeholders. It is unclear what factors have been considered to assess the health of a place.

PM2 Wandsworth Town Place Based Policy

We note that B. 1 'Inclusive Growth' now refers to capacity to provide 3,079 homes by 2032/2033, over the first 10 years of the Plan period. This is a significant number of new homes which will have an impact on healthcare infrastructure. Some sites are under construction, notably Ram Brewery (site WT2). The Swandon Way Cluster sites have planning permission (WT12 Homebase and WT13 B&Q, Smugglers Way) where the CCG and Council have sought and secured planning obligations to enhance existing healthcare infrastructure.

We note that the two site allocations contain provision for social infrastructure and community facilities i.e. WT1 (Chelsea Cars and Kwik Fit, Armoury Way, SW18) and WT20 (Southside Shopping Centre, Wandsworth High Street SW18) and we would welcome the opportunity to explore these provisions for healthcare services use.

However, we would welcome the opportunity to assess the cumulative impact of growth and to discuss options for additional healthcare capacity in the town centre, which could involve a new health facility.

PM3 Nine Elms

We note that B. 1 ‘Inclusive Growth’ now refers to capacity to provide 8,414 homes by 2032/2033, over the first 10 years of the Plan period. According to the Authority Monitoring Report 2019/20, there were 10,383 new homes completed or under construction as of 31 March 2020.

We welcome the policy clause C.3 ‘People First’ which states that the Council will continue to work in partnership with the NHS to deliver the new healthcare facility at Sleaford Street, secured as part of Phase 4a of the Battersea Power Station development.

The potential new health facility at Nine Elms Square is indicated on Map 5.2 Spatial Area Map: Nine Elms. However, the corresponding site boundary – the New Covent Garden Market Northern Site ‘Nine Elms Square’ is not indicated.

As the Infrastructure Delivery Plan notes the strategic need for a second facility at Nine Elms Square is monitored annually as part of NEV Healthcare Provision Programme and a final evaluation will be made in 2025. The CCG will work with the Council to review the scale and timing of housing and population growth over the next 10 years and the capacity of existing infrastructure in and around the northern part of VNEB, in both Wandsworth and Lambeth.

PM4 Clapham Junction and York Road/Winstanley Regeneration Area

We note that B. 1 ‘Inclusive Growth’ now refers to capacity to provide 2,995 homes by 2032/2033, over the first 10 years of the Plan period.

We note that the policy clause C. 4 ‘People First’ states that an assessment of community facilities including health provision will be required in support of development proposals to identify capacity and future needs. The York Road/Winstanley Regeneration Area is a key site and the site allocation CJ5 refers to the potential for health use. The Infrastructure Delivery Plan Appendix 1 - Infrastructure Delivery Schedule includes project H7 and refers to the permitted scheme for the York Road/Winstanley area (ref 2019/0024) which includes the provision of a health centre.

Discussions between the CCG and Council on re-provision of services within the regeneration scheme are progressing which include capacity for future development in the wider area

PM5 Putney

We note that B. 1 'Inclusive Growth' now refers to capacity to provide 200 homes by 2032/2033, over the first 10 years of the Plan period. We note that the site allocations refer to town centre uses which would not preclude health uses from being included, if needed.

We note that 'People First' Clause C 4 refers to proposals to develop Putney Library into multi-purpose hub which supports an increased range of public services and community and cultural activities and flexible and affordable workspace. The CCG would welcome an opportunity to work with the Council to included enhanced healthcare capacity within the scheme.

PM6 Tooting

We note that the area includes site allocation TO2 St Georges Hospital, Blackshaw Road, which has potential for mixed use development including residential and improvement of healthcare facilities.

We supported the previous representations made by St George's University Hospitals NHS Foundation Trust and note that the whole hospital site is now allocated for development. We also welcome the statement in paragraphs 8.23 and 8.24 that the redevelopment of the site is subject to an approved Estates Strategy and development proposals will be prepared through a collaborative approach in accordance with the emerging Estates Strategy and forthcoming masterplan. We note that Map 8.1 Spatial Area Map Tooting still indicates proposed blocks on the Car Park and adjoining land, which we consider is unnecessary given the focus on the redevelopment of the whole site.

We also welcome changes to the text which respond to the Trust's comments. Paragraph 8.27 'Parking' now supports measures to encourage active travel and the use of public transport to the site encouraging modal shift away from the private car. Paragraph 8.30 'Context' now requires that future redevelopment proposals will need to demonstrate how they successfully integrate new residential development with the existing hospital use so as not to inhibit the future operation of the hospital.

The Infrastructure Delivery Plan (IDP) schedule includes Tooting Health Centre at 63 Beville Allen Close and refers to the optimisation of the health centre to create additional space (project ref H12). The health centre lies just outside of the Tooting area strategy boundary and town centre boundary. The project and scope have not been fully identified and the option to redevelop/expand or relocate should be included in the Infrastructure Delivery Plan.

PM7 Roehampton and Alton Estate Regeneration Area

We note that B. 1 ‘Inclusive Growth’ now refers to capacity to provide 849 homes by 2032/2033, over the first 10 years of the Plan period.

We support the new clause C. 7 ‘People First’, which promotes healthy and active lifestyles and measures to reduce health inequalities. However, we suggest the addition of “including improvements to local healthcare provision” to recognise the site allocations RO1 and RO3 and the projects in the Infrastructure Delivery Plan (ref H6 and H8).

We note that the Site allocation RO1 Alton West Intervention Areas previously referred to a range of social infrastructure, including ‘GP facilities, leisure and health uses’. In the latest draft version, there is reference to new and improved community facilities, but not specifically to health use. There are plans to transform primary care services in the area, which include improvements to primary care provision on the Alton West site to be included within the community hub building.

We note that site allocation RO3 Queen Mary's Hospital car park proposes additional medical facilities and mixed uses in addition to replacement car parking. Optimisation of site use and possible development of additional buildings at the Queen Mary Hospital site will continue through the plan period.

We welcome the change to the ‘Site Allocation’ text in response to St George’s University Hospitals NHS Foundation Trust comment that any non-healthcare uses should only be permitted where it can be demonstrated in the context of an agreed Estate Strategy that the land is not needed for healthcare-related uses.

PM8 Balham

The area includes only one site allocation (BA1 Sainsbury's Car Park, Bedford Hill). However, another site allocation, Balham Health Centre (ref OUT1) is located to the south of the town centre. This is indicated on Map 10.1 Spatial Area Map: Balham. The allocation refers to mixed-use development providing residential and the expansion of healthcare facilities.

The site owned by NHS Property Services. We agree with their previous representation that there is an opportunity to redevelop the site with the addition of residential use enabling the improvement and expansion of healthcare space, either on site or within the local area. An option for residential only re-development is only deliverable if a suitable alternative healthcare site is identified. No alternative site is identified and H13 in the IDP supports expanded health use and residential at the site.

PM9 Wandsworth's Riverside

We note that considerable development along the riverside between Wandsworth Town and Battersea Park. However, a number of sites present further opportunities for housing growth. Policy PM9 B. 1 'Inclusive Growth' now refers to capacity to provide 904 homes by 2032/2033, over the first 10 years of the Plan period.

Eleven sites are allocated in the area. All the sites are considered appropriate for mixed use, with some already having planning permission or subject to current applications.

The Council's public health team and HUDU, on behalf of the CCG, have responded to individual planning applications to assess the site-specific impact of proposals, but we would welcome the opportunity to assess the cumulative impact of development in the area. It is noted that other planning applications which have come forward on sites which are not identified as site allocations.

Site Allocations Outside the Spatial Areas

Two other site allocations are located close to the Wandsworth Riverside area.

We note that the site at 259-311 Battersea Park Road (ref OUT2) has potential for mixed use including residential, community uses, including health, retail and the provision of a new public library. The site boundary includes the Doddington Health Clinic which is owned by St George's University Hospitals NHS Foundation Trust. The site boundary excludes Battersea Fields Practice premises in Austin Road. The NHS Trust and the CCG are in discussions with the Council and other stakeholders regarding development options combining the library, health clinic, GP surgery, retail units and Tesco site into an integrated solution. The OUT2 site includes reprovision of health space to ensure no loss of health floorspace in the area. Discussions have been held to include reprovision of Austin Rd Surgery within the scheme which will allow the Doddington Clinic floor area to be included with the Austin Rd Surgery as part of the redevelopment. The scheme has a significant number of land interests, both freehold and leasehold, and is subject to a procurement process to bring publicly owned assets into the scheme.

The site at Bridge Lane Medical Group Practice, 20 Bridge Lane (ref OUT5) is owned by NHS Property Services and has potential for mixed use development including residential and health use. We agree with their previous representation that there is an opportunity to redevelop the site with the addition of residential use, or residential only if the existing services are relocated within an alternative healthcare facility in the wider area such as within the OUT2 scheme at sufficient scale.

We note that in response to comments from South West London and St George's Mental Health NHS Trust that a site allocation for Springfield Hospital has been added (ref OUT3).

The adopted Local Plan Site Specific Allocations Document (2016) includes this site (ref 9.1).

Residential development in the Plough Lane area of Merton and at Springfield Hospital is placing demands on Earlsfield GP Practice on Steerforth St. which will need extension or redevelopment and should be included in the Infrastructure Development Plan.

LP2 General Development Principles

In response to are comments, we support Clause C which states that development must demonstrate how it takes account of existing or planned social and transport infrastructure and contributes to the provision of additional infrastructure where necessary. We also note that paragraph 14.13 now refers to the Infrastructure Delivery Plan which includes an infrastructure outline a list of infrastructure projects some of which will be reliant on developer contributions.

LP15 Health and Wellbeing

We support Policy LP15 which will help achieve the vision and an objective of the draft Local Plan to improve the health and wellbeing of the local population and reduce inequalities.

We note that clause A. refers to Tooting, Battersea, Queenstown and Roehampton as priority areas. We suggest that the supporting text explains why particular attention should be given to these deprived neighbourhoods in the context of health inequalities in the borough.

The Health Impact Assessment of the draft Local Plan (January 2022) notes that there is a life expectancy gap of approximately 9.3 years and 4.5 years for men and women respectively between the most and least deprived areas of the borough (paragraph 4.8). According to English Indices of Deprivation (2019), Wandsworth had three Lower Super Output Areas (LSOA) that ranked amongst the 10% most deprived in London: two in Latchmere and one in Tooting (paragraph 4.9).

In response to our comments, we support the amended wording to clause B (1) relating to the submission of health impact assessments. We also welcome the additional of a new paragraph (16.8) which provides some guidance on health impact assessments.

The Health Impact Assessment of the draft Local Plan recommends that major developments in areas of deprivation should undertake detailed HIAs (paragraph 4.12). This could be determined at the pre-application stage and could involve a greater level of analysis and community engagement. We suggest that a further sentence is added to paragraph 16.8 of the draft plan to reflect this recommendation: “For major developments in

areas of deprivation, a detailed health impact assessment should be undertaken which could involve a greater level of analysis and community engagement.”

We also welcome the addition of new clause (4) which seeks to ensure the provision of affordable and healthy homes.

The draft plan could also consider the longer-term health and wellbeing implications of the Coronavirus pandemic in terms of travel, changing working patterns and demand for office space, the future of town centres and design of buildings and spaces. The pandemic has accelerated changes in the way healthcare services are provided and how facilities are used, with greater demand for digital services and flexible space. It is recognised that the NHS has a role in supporting the regeneration of high streets in the borough with an opportunity to locate health and wellbeing community hubs in town centres. The Health on the High Street (NHS Confederation, 2020) report recommends accessible high street locations for the provision of primary and community healthcare services, including the temporary use of vacant units utilising the greater flexibility with the Class E use class.

The draft plan should confirm that health and well-being facilities are town centre uses which, with good access to sustainable transport, sustain town centres and reduce carbon emissions through providing linked journey opportunities. Examples of supporting high streets includes the reuse of Silverdale House, Wandsworth High Street as a GP surgery and the provision of health and well-being space within the Southside Shopping Centre.

LP17 Social and Community Infrastructure

We support Policy LP17 which supports the provision of new social and community facilities, including health facilities as identified in strategies and investment plans using s106 planning obligations to mitigate the impact of development where insufficient capacity exists.

In response to our comments, we are pleased that the policy has been amended to clarify (in clause B 6) that the loss of a health facility will only be permitted where it has been declared surplus as part of a strategic restructuring of health services demonstrated by an overarching estates strategy or similar needs-based assessment.

However, to fully align with Policy S1 clause F 2) we suggest the following amendment:

“6. that for existing health or emergency service facilities, loss will only be permitted where facilities are declared surplus to need as part of a service transformation plan ~~any strategic restructuring of health or emergency services demonstrated through an overarching or estates strategy~~ where investment is needed in modern, fit for purpose infrastructure and facilities ~~or similar needs-based assessment.~~”

LP25 Affordable Housing

It is recognised that the shortage of affordable housing in London is hindering the recruitment and retention of public service workers. The National Planning Policy Framework definition of affordable housing (Annex 2) includes housing for sale or rent for essential local workers, which includes NHS staff. The latest national NHS guidance is 'Homes for NHS Staff' published by NHS Improvement in June 2019.

The use of public sector land represents an opportunity to deliver homes that can meet the needs of the borough's essential workers. It is noted that the Council's Housing and Homelessness Strategy 2019-2022 states that the Council will give Wandsworth workers priority access to affordable and intermediate housing and where appropriate this will include options designed to meet demand from key workers including for low cost rented housing.

To reflect paragraph 4.5.6 of the London Plan we suggest that the following paragraph is added:

"Public sector land represents an opportunity to deliver homes that can meet the needs of the borough's essential workers. Innovative housing products that meet the requirements of this Policy including approaches that set aside a proportion of homes on land owned by public sector organisations for essential workers will be supported."

Appendix 1: Requirements for floorspace within the Primary Care Networks.

Table 1: Impact of housing delivery by Local Plan areas

Local Plan Areas Housing delivery	New housing 2021/22-39/40	Population growth @ 1.9 per dwelling	Space requirements @ 60sqm per 1000 pts	Delivery projects Bold – In progress Bold italics – proposal being developed Plain text – Future project to be developed
Balham	122	232	14	Balham Health Centre
Clapham Junction and Winstanley/York Road Regeneration Area	3400	6460	388	<i>The Junction Practice reprovision within new Winstanley Estate Health Centre</i>
Nine Elms	10997	20894	1254	<i>Sleaford St and Nine Elms Square Scheme</i>
Putney	273	519	31	Inclusion in Library Community Hub project to be scoped
Roehampton	1082	2056	123	<i>Alton/Danebury relocation/ Mayfield expansion</i>
Tooting	322	612	37	Project to be identified
Wandsworth Town	3800	7220	433	<i>Atheldene/Brocklebank redevelopment/Eileen Lecky/Triangle surgery relocation</i>
The Wandle Valley	660	1254	75	<i>Earlsfield Surgery expansion</i>
Wandsworth Riverside	1346	2557	153	Project to be identified
Total (Area Strategies)	22002	41803	2508	
Rest of Borough	2246	4267	256	<i>Greyswood expansion</i>
Boroughwide small sites (windfalls)	5222	9922	595	Local growth
Total	29470	55993	3360	sqm

Table 2: Floorspace requirements of Primary Care Networks (PCNs)

ID	Primary Care Network	Current sqm	Deficit sqm	Growth floor area	Total new floor area required	Planned development projects Bold – In progress Bold italics – proposal being developed Plain text – Future project to be developed
1	Balham, Tooting, Furzedown	2981	942	300	1242	Balham HC redevelopment, Greyswood internal re-organisation
2	Battersea	2192	1092	1438	2530	Sleaford St, Nine Elms Square. Doddington regeneration,
3	Brocklebank	612	737	215	952	Atheldene Regeneration/ Brocklebank replacement
4	Grafton	1500	885	223	1108	Project to be identified
5	Nightingale	1371	647	82	729	Project to be identified
6	Wandle	1575	639	263	902	Triangle relocation, Earlsfield extension/reconfiguration
7	Wandsworth	1695	479	446	927	Winstanley Regeneration/The Junction Practice relocation
8	Wandsworth Prime	1888	1032	120	1152	Mayfield expansion completed. Scoping possible Putney Library Community Hub option. Eileen Lecky refurbishment
9	West Wandsworth	631	147	273	420	Alton Regeneration, Danebury /Alton relocation
	Total floor space required		6600	3360	9960	

Source Wandsworth NHS Estate Strategy 2021