

Wandsworth Living Streets

Wandsworth Local Plan Response – 28 Feb 2022

Dear Sir/Madam,

Thank you for the opportunity to respond to the Draft Local Plan (“dLP”): Pre-Publication version consultation.

Wandsworth Living Streets (“WLS”) is a local group of the UK charity, Living Streets. Our members include local residents, families with young children, active seniors and people who run local businesses, charities, and other community projects. Our members have a variety of specific place making expertise as well as general community interest.

We have a vision for the Borough to make it the best place to live, to work, to travel, to relax and to play. We are entirely focused on enabling the making of thoughtful, engaging, lively, human, bio-diverse and community-led spaces and places that enable social cohesion, community building, active play and healthy, fulfilling lives. We want all our places to achieve their potential, and we believe they can do so with the right policies and appropriate focus on inclusive engagement, and by adopting and implementing best practice from both London, across the United Kingdom and internationally.

Our streets, estates, town centres and open spaces should prioritise local people living, working and playing. Transport across and through the Borough should be prioritised according to the Sustainable Transport Hierarchy, and focus on enlivening, rather than diminishing our sense of place. Our streets should be free from road danger and be improved in a way that meets the objectives of the Climate Emergency and the Wandsworth Environment and Sustainability Strategy (WESS), which should act as a guide for all planning decisions and expenditure on maintenance and enhancements of the public realm. Our streets and public spaces should facilitate clean air, and improve tree and canopy cover, planting and wildlife whilst mitigating water run-off and flooding. Our children should be afforded to play outdoors with their friends in the spaces outside their homes without fear and our neighbours should be enabled to build strong local community networks and friendships.

We believe local people should be given “agency” over the space around their homes in furtherance of the public good, that everyone should be involved in place making across all demographics and income groups, and that consultations should be significantly improved to equitably address the aspirations of our diverse community.

The 2023 Local Plan should be forward looking, not just in terms of the physical design of our public spaces, but through the use of current and emerging technology and data, and across design, decision making, streets, transport, energy production and waste management.

We look forward to having our comments taken into account in the next iteration of the Local Plan.

Yours faithfully

Wandsworth Living Streets

28 February 2022

Wandsworth Living Streets Response to the draft Local Plan

We very much welcome the emphasis on Place Performance and Place Making, the adoption of the Sustainable Transport Hierarchy, continuous reference to the Wandsworth Environment & Sustainability Strategy (“WESS”) throughout the LP.

We note the Local Plan is the document that sets out the vision for the all of Wandsworth’s public and private spaces over the next couple of decades. We also note that Wandsworth Borough Council must adhere to both London and UK planning policies, and there are therefore statutory constraints within which the LP must be developed.

We appreciate the LP is by necessity a very long and detailed document, and therefore our response is set around 5 key themes which we hope are reflected in the next iteration of the LP, noting that the Local Plan is the pre-eminent document that will determine how all our spaces and places will be enhanced from 2023-2038:

1. World-class design
2. Legacy streetscape
3. Technology & data
4. Key performance indicators
5. Consultations

1. World-class design

Within the London and national context, we expect the LP, and its policies, to strive to ensure that any new developments across brown-field sites, town centres, open spaces and legacy streets are ambitious, learn from and use best practice, and enable decision makers, including officers and councillors, to make decisions that are entirely consistent with the Local Plan. Each major new development should learn and apply the lessons from recent developments within the Borough and elsewhere, including for enabling, and even demanding developers deliver BREEAM “Outstanding” buildings for example. We would like to see planning policies that are aspirational for both the Council and Developers alike, and go beyond merely facilitating the delivery of standard scheme developments.

Imagery to enable aspirational development

We note that the LP is quite a “wordy” document punctuated with imagery of existing spaces across the Borough. We would like to see more visual examples of best practice throughout the document to elevate everyone’s expectations of what is possible. The LP is about creating things that people can see, touch and feel – we would like to see this better reflected in this document using visualisations of best-in-class examples of large-scale developments, buildings and places, from Wandsworth and around the World.

2. Legacy Streetscape

In paragraph 1.9 we note that WBC intends “to be the greenest inner London Borough” and where businesses, town centres, people and neighbourhoods thrive. Whilst The LP includes much detail on town centres and open spaces, we note that our legacy streetscape and neighbourhoods, built predominantly from circa mid-late 1800s to the present day, is the predominant land-use across the Borough and yet this is not formally recognised within the LP. We would therefore like to see a new section specifically dedicated to our legacy streetscape, similar to section “21. Green and Blue Infrastructure and the Natural Environment”, and aligned with the WESS and Walking & Cycling Strategy.

In this new section, we would expect it to cover, but not limited to, the following:

- **Garden strategy** – ensure local residents are supported in maintaining and enhancing green space at the front and rear of their homes to support bio-diversity, noise suppression, and Summer heat and water run-off mitigation. For example we note a proliferation of the use of plastic “grass” in the Borough which is environmentally harmful, yet residents don’t necessarily have the information to make informed decisions – WBC can play a leading in role in ensuring all residents make informed choices that align with the WESS.
- **Pavement strategy** - Pavement space should be a protected public asset. The LP policies should ensure total pavement space on each street is increased rather than diminished. We are opposed to measures which sacrifice this space to enable or encourage more driving, such as pavement-placed EV chargers and electronic advertising hoardings (e.g. BT InterLink)
- **Kerbside strategy** – we ask WBC to consider all potential uses of our kerbside for now and the future, aligned with the WESS (and other relevant strategies, notably the Walking and Cycling Strategy, and the Active Wandsworth Strategy) and which could include a much broader use of this valuable asset, including the potential for highly efficient, technology-enabled waste management and recycling, pocket parks, dwell spaces for adults and seniors, play spaces for children, energy generation, enhanced tree cover and re-greening, and better biodiversity. Residents should be given more agency and control over the space outside their homes – if they don’t own a car, residents, individually and collectively should be granted permission for alternative, community and environment-enhancing uses.
- **Parking strategy** – we would like to see an update and expansion of CPZs better aligned to changing local transport needs, and which address significant weekend parking issues. We note the streets are often busier midday on a Sunday than during the week, and CPZs need to reflect this particularly in respect of new developments which change driving patterns, whilst ensuring WBC retains parking income. Too often, more relaxed

parking controls at weekends often inhibit cycling in particular, making inclusive family cycling, whether for transport or recreation, extremely challenging and less safe. We continue to advocate for a review of Wandsworth's parking strategy with the aim of making charges better reflect the cost of car parking to wider society. In this context, we note that Wandsworth has the highest proportion of roadpace (nearly 20%) taken up by residents' onstreet car parking of any London borough; and the high value of land allocated to residents' onstreet parking.

To highlight the need for a new section on Legacy Streetscape, paragraph 20.7 states, "Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. This should manifest itself in the form of active travel infrastructure such as clear and well-designed cycle lanes, cycle parking infrastructure, and improvements to the main pedestrian thoroughfares". But it is clear isolated active travel infrastructure is not, in of itself, sufficient and needs to be considered in the wider context/geographical area that enables congruous, cross-Borough networks to be established, rather than simply creating isolated, unconnected pockets of high-quality networks dispersed across the Borough that do not connect residential areas, our open spaces and town centres.

We believe this section is critical in enabling the delivering of the WESS, enabling Sustainable Transport and supporting the new Walking & Cycling Strategy.

3. Technology & Data

We would like to see a section within the LP which explicitly references the use of existing, new and emerging technologies to improve the Borough's buildings and places, and the use of data to inform better choices and decision making. "Smart Growth" and first-class local engagement can only be achieved through relevant and pertinent information. This may include, but is not limited to:

- District heating networks (incl. elimination of gas combustion where possible)
- Micro power/electricity generation including wind, solar and battery storage
- Heat reclamation from waste hot water
- AI-based technologies for determining movement strategies around new sites (incl. people & vehicle movements)
- Ensuring all developers are using Building Information Modelling, concepts such as "Digital Twins" and using video CGIs to improve engagement and consultation
- Construction traffic & supply chain – use of aggregated data across sites to enable more efficient logistical solutions across the Borough
- Waste management – developing solutions to enable residents of new and legacy housing stock to understand their refuse/waste volumes

4. Key performance indicators

The key to determining success is by setting out clear, concise and measurable objectives at the outset that can then be unambiguously assessed following implementation.

We would therefore like to see tangible and realistic metrics and key performance indicators (“KPIs”) applied to the key planning policies, and measures that support broader WBC objectives.

For example, we know that air quality is the direct consequence of a variety of activities including domestic energy and private car use. We therefore expect to see specific targets to enable a shift in behaviours, e.g. reduced car use/ownership by better targeted CPZ permit pricing structures.

Healthy Streets metrics – we would like the Healthy Streets Check for Designers used (and to see the Healthy Streets Index) for all new developments, and would like WBC to adopt a policy that any development or change to the streetscape leads to a measurable and tangible improvement in the Healthy Streets Index, both for the scheme itself and surrounding streets and places.

WESS - to support the WESS, we would like to see statistics and KPIs for emissions produced for new developments, and improvements and repairs to the public realm so that stakeholders can understand the environmental impact of construction of new buildings and repair of carriageways for example on our local, national and global climate.

Land use - we would also like to see annual data produced on land use across the Borough, including residential, office, industrial, public transport, roads (split between ‘free’ carriageway and parking spaces), pavement space, open spaces and water courses. Only through understanding land use in the Borough, can we determine when the Local Plan is leading to tangible overall improvements in our places and streets.

5. Consultations

We note that undertaking Consultations is a statutory obligation when determining the consent and implementation of new planning consents or changes to the public realm. However, we also note that the WBC processes often feel “opaque” to the general public and clarity re: the approach to consultations would be very much appreciated, and should be addressed and well articulated in the dLP.

As an example, a planning application which is overwhelmingly rejected by local residents will often gain consent (e.g. Atheldene/Garratt Regeneration) without any amendment, whilst changes to the legacy streetscape will almost always be rejected with relatively few objections (but which slightly exceed those in favour).

We would therefore like to see Consultations addressed as a specific section, with a clear process set out, and identifying how consultations work, the timeframes, the decision-making forums, and include other key information that wider stakeholders may find valuable when participating in the consultation process.

We would also urge WBC to consider exploring other approaches to consultations that are successfully used elsewhere to gain a more inclusive and insightful perspective from a broader local demographic, perhaps through sampling. Presently consultations tend to attract opinions at the extremes of pro/against which frequently results in frustration and disengagement if people feel they are not being heard. A more inclusive consultation process would enable quieter voices be heard, whilst getting a broader and more useful insight into local resident/business concerns, expectations and proposals for scheme improvements. Exemplars of best practice in talking to people about the future of their streets are increasingly available across London.

Scheme tracker - the key to successful consultation is openness, and ensuring any variations against consented schemes are shared as proactively as possible, such that local stakeholders understand the balance of risk between local residents, the council and developers/land owners. A clear tracker for each development from submission through to delivery and completion, including highlighting any changes, would be extremely useful.

6. Specific comments

We have more specific comments as follows:

- Page 29 – “15 minute Neighbourhood” – this needs to be clearly defined, since it is not a distance metric and is therefore open to interpretation depending on transport mode
- 2.69 Traffic and Public Transport – this should probably say “2.69 Motor Vehicles and Public Transport”, given that (motor) traffic is a consequence of the use of the transport mode
- Sections 14-21 are chapters re: policy and therefore should be moved ahead of sections 4-13. Stakeholders would likely need to understand the policies before they then understand how they apply to specific areas in the Borough / Spatial Strategies
- Map 19.1 – Local Shopping Area needs to include Wandsworth Town/Old York Road
- PTAL – please include a PTAL map
- LP9 Advertising – this policy needs to be tightened up. Electronic advertising boards are increasingly visually intrusive, in many cases are designed to distract drivers (with obvious implications for road danger) and the designs are intruding over public pavements and carriageways which seems unreasonable given other, sensible planning constraints

- Sustainable Travel Hierarchy – please include an image of this in Section 20
- Construction Logistics Plan – we would like to see a standard construction logistics plan for all developments that specifically addresses road danger (particularly to people walking and cycling), sets expectations and targets for developers and contractors that ensures pavement space, safe crossings and cycling is protected, and specifies very clear routes to/from sites across the Borough. This may require setting minimum standards for banksmen/women based on scheme size.

ENDS