



Date: 28/02/2022

Palestra,
197 Blackfriars Road
London
SE1 8NJ

Email:
PropertyConsultation@tfl.gov.uk

By email: planningpolicy@wandsworth.gov.uk

Dear Sir / Madam,

RE: WANDSWORTH LOCAL PLAN PUBLICATION (REGULATION 19)

Thank you for providing the opportunity to comment on Wandsworth Local Plan Publication Regulation 19.

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD have engaged through the Local Plan preparation process and have submitted the following representations:

- Wandsworth Local Plan Employment and Industry Review
- Wandsworth Local Plan Issues and Options (December 2018)
- Wandsworth Call for Sites (March 2019)
- Wandsworth Local Plan Pre-Publication Regulation 18 (February 2021)

Our representations in respect of the Wandsworth Local Plan are set out below.



SDS1: Spatial Development Strategy and Policy LP24

TfL CD notes the amalgamation and redrafting of Policy LP24 and SS1. The addition of the wording in criterion A3 which supports the intensification of small sites within areas of higher accessibility is supported. However, it is considered that the new policy does not provide as much clarity as the previous policies, in particular the policy no longer specifically prioritises the redevelopment of brownfield land, vacant and underused buildings which is where development should be supported in line with the London Plan and NPPF, particularly where these are in areas of good access.

Policy PM2: Wandsworth Town Place Based Policy and Site allocation WT16

TfL CD note the council's response in the consultation statement to our previous representation which recognises the site is a key gateway into the borough and will require high quality design. However, TfL CD remain concerned about the use of the word 'striking' in the site allocation as that is a relatively ambiguous and subjective concept. Reference to high quality design instead would be more appropriate.

Policy LP10: Responding to the Climate Crisis

With regard to criterion B1 and B2 TfL CD previously suggested that reference to viability is included in the policy alongside technical feasibility to justify not achieving the 'Outstanding' requirement. It is noted that paragraph 15.9 now acknowledges that in exceptional circumstances that where it can be demonstrated to the Council's satisfaction that an 'Excellent' rating may be considered where an 'Outstanding' rating is not economically viable. TfL CD maintain that this should be included in the policy as well for clarity and to ensure the policy is effective.

Policy LP23: Affordable Housing

As set out in TfL CD's previous representations TfL follows a portfolio approach portfolio approach in line with London Plan Policy H4 which provides the flexibility for more complex sites to come forward with a lower affordable housing provision where that site would be unviable if it had to provide the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. In criterion b3 of the previous iteration of the Local Plan there was acknowledgment of the portfolio approach, however, this appears to have now been removed. Criterion b3 should be reinstated to ensure the Local Plan is consistent with the London Plan Policy H4.

Policy LP38: Affordable and Open Workspace

TfL CD welcomes the changes to Policy LP38 criterion a following our Regulation 18 representations.

Unallocated Sites



TfL CD have previously promoted a number of sites through the Wandsworth Call for Sites consultations, and the following TfL landholdings remain unallocated within the latest draft Local Plan. It is considered that these sites are suitable, available, and developable and so should be allocated for mixed-use development:

- 2, 2a, 2b, 2c, and 2d Tooting Bec Road, SW17 8BD
- 2,4,6 and 8 Trinity Road, SW17 7RE
- Land at East Putney Station

TfL CD would like to continue to promote these sites for allocation within the Local Plan, and that they should also be included in the Council's brownfield register.

We believe that our sites located along Tooting Bec Road and Trinity Road Station are suitable for site allocation based upon the guidance given in the Site Allocations Methodology Paper and the Local Plan. The Site Allocations Methodology Paper stated that small sites (under 0.25 ha) were excluded unless the site *“presents a particular opportunity for intensification. Smaller sites that would particularly benefit from site-specific policy to promote investment, optimise capacity and/or secure the best development outcome were retained.”*

Site allocations on these sites would support progression of these sites including Land at East Putney Station. Development could optimise the capacity of these sites which are situated in sustainable locations directly adjacent to transport nodes (Tooting Bec Road and Trinity Road have a PTAL rating of 6a) and are located within a local centre.

Concluding Remarks

We hope that these representations are helpful but if you need any further information or would like to discuss any of the points raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.

Yours faithfully,

Daniel Fleet

Assistant Planner, Transport for London Commercial Development