

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

CBRE

CBRE, Inc.
Henrietta House
Henrietta Place
London
W1G 0NB


www.cbre.com

24 February 2022

BY EMAIL

Dear Planning Policy Team,

Representations To The Wandsworth Draft Local Plan: Publication Version

On behalf of our client, Royal Borough of Kensington and Chelsea Pension Fund (the Fund), CBRE has been instructed to submit representations to the Wandsworth Draft Local Plan: Publication Version.

The Fund has a land holding within LB Wandsworth across 36-46 St John's Road and 17 Severus Road in Clapham Town Centre. The Fund purchased the site in March 2020, and we previously responded to the Pre-Publication Version of the Draft Local Plan, on 01 March 2021. Separately, we had conversations with the LB Wandsworth policy team regarding the site and were encouraged to put it forward for a site allocation at this previous stage of the consultation.

The majority of the site is located along St John's Road, but it also faces onto Severus Road and Eckstein Road. Given the town centre location, proximity to public transport (the site has a 6b PTAL rating - meaning excellent), the relatively limited constraints that the site is subject to and the apparent development potential of the site, we consider that it is a clear and sustainable development opportunity that should be given a specific allocation within the Local Plan. Our representations to the above consultation are made in this context.

The Site

The site extends to an area of approximately 0.23ha. Currently at ground floor, L'Occitane (46 St John's Road), Waitrose (40-44 St John's Road) and Superdrug (36 St John's Road) occupy the site along the St John's Road street frontage, providing c. 1,800 sqm of ground floor retail space. 46 St John's Road lies on the corner of the site (St John's Road/Eckstein Road) and extends to three storeys in height. The Waitrose and Superdrug units are located within the art deco façade facing onto St John's Road. The third storey of the façade is false meaning the accommodation only extends to first floor level. The roof of the buildings is occupied by various forms of plant. The site ownership also includes 17 Severus Road which houses eight residential units.

Given the sustainable location of the site, we consider it could come forward for redevelopment within the Local Plan period (likely 8-12 years). There have been some recent developments in the surrounding area proposing a double height additional storey (six storeys total) additional height, including the development at the Arding and Hobbs department store and at 37-39 St John's Road, adjacent to the site.

Site Allocation CJ7, St John's Road and 17 Severus Road

We have reviewed the proposed wording for the Site Allocation and, on the whole, are in agreement with its wording and support the identification of the site as being suitable for development and for uses including retail, hotel, office, residential.

There are however some instances where we consider the wording should be revised, as follows.

Paragraph 6.89 - Site Layout

Current words:

The site has frontages on to St. John's Road, Eckstein Road and Severus Road. The ground floor of St John's Road is a primary retail frontage. The Severus Road frontage currently has an office frontage associated with the retail use. Severus Road is part residential.

A retail frontage on to St John's Road is required with upper floors of class E or residential. For Eckstein Road a commercial frontage at ground floor is possible with residential or offices/hotel above. For Severus Road frontage residential or hotel uses to all floors is appropriate.

Proposed words:

The site has frontages on to St. John's Road, Eckstein Road and Severus Road. The ground floor of St John's Road is a primary retail frontage. The Severus Road frontage currently has an office **a back of house** frontage associated with the retail use. Severus Road is part residential.

~~A retail frontage on to St John's Road is required with upper floors of class E or residential. For Eckstein Road a commercial frontage at ground floor is possible with residential or offices/hotel above. For Severus Road frontage residential or hotel uses to all floors is appropriate.~~

Redevelopment of the site for residential/office/hotel use is appropriate and the ground floor frontage on to St John's Road should be retail.

Comments:

The site is currently arranged as multiple buildings/addresses. Such an arrangement does not optimise the efficiency of the site's footprint as it involves multiple cores, entrances and other unproductive spaces. The current wording of the allocation maintains this inefficient arrangement, and seemingly imposes a requirement for multiple uses across the site, rather than allowing for a design and/or market driven decision to be made regarding the site's land use composition.

The proposed revised wording ensures that the allocation is sufficiently flexible to be **effective** (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which:

- makes effective use of land (NPPF Para 120) by maximising net internal area and enabling efficient floorplates to be delivered;
- enables rapid response to changes in economic circumstances (NPPF Para 82.d) through the identification of the site as being appropriate for various land uses;
- ensures that the character and vitality of the town centre are protected/enhanced, which is an objective of the Draft Plan, through the requirement to provide a retail frontage at St John's Road.
- is unambiguous, allowing for a clear and concise understanding of the site's land use requirements.

Paragraph 6.92 - Building Heights

Current words:

In accordance with the tall and mid-rise building maps in Appendix 2, the site is not located in a tall or mid-rise building zone. Development proposals for tall or mid-rise buildings will not be supported.

Proposed words:

In accordance with the tall and mid-rise building maps in Appendix 2, the site is not located in a tall or mid-rise building zone. Development proposals for tall or mid-rise buildings will not be supported.

Specific building heights on the site will be established through a design-led process, in accordance with strategic policy.

Comments:

We consider that ruling out any possibility of mid-rise buildings on the site is not **in general conformity with Policy D9 of the London Plan**, which states that Tall Buildings should not be defined as constituting less than 6 storeys. We recognise that the Draft Plan distinguishes between ‘mid-rise’ and ‘tall’ buildings, but the effect of restricting development to fewer than 6 storeys is essentially the same.

We also consider that this approach is not consistent with Policy D3 of the London Plan, which states that “all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth”. In this policy context, it is conceivable that additional floor/floors have the potential to be acceptable.

The proposed revised wording ensures that the allocation is in conformity with the London Plan, as required by Section 24 of the Planning and Compulsory Purchase Act (2004). It also ensures that the allocation is sufficiently flexible to be **effective** (NPPF Para 35.c) in facilitating efficient redevelopment of the site to take place in a manner which:

- optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (NPPF Para 130.e). Considering the site’s location within a town centre, with high connectivity, the current site allocation is not considered to optimise site capacity;
- makes efficient use of land (NPPF Para 124) as the site is located within an area of high public transport accessibility (PTAL 6b) and therefore can promote sustainable travel modes. As such, a higher density development than currently envisaged would be appropriate;
- makes effective use of land (NPPF Para 120) by promoting under-utilised buildings where this would help to meet identified needs for housing where such sites can be used more effectively.

Summary

In conclusion, we continue to be supportive of the principle of the Site Allocation but believe the above amendments will serve to avoid any ambiguity in understanding the site requirements, and allow for any forthcoming scheme to be developed through the design-led approach, that optimises the site’s capacity.

It is our view that, in absence of these amendments, the site allocation will remain unclear and due to this, it is unlikely to be effective. Effectiveness is one of the tests of soundness within the NPPF. The definition of mid-rise buildings and application of this policy approach to the site will also fail to be in general conformity with the London Plan.

Given the Regulation 19 stage of the plan, our client wishes to reserve the right to be able to participate in any forthcoming Examination in Public .

If you have any queries regarding the site, please do not hesitate to contact me.

Yours faithfully



Adam Garcia MRTPI | Senior Planner

CBRE Ltd | UK Development – Planning

For and on behalf of Royal Borough of Kensington and Chelsea Pension Fund



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	Mr	Mr
First name	Phil	Adam
Last name	Triggs	Garcia
Job title (where relevant)	Tri-Borough Director of Treasury and Pensions	Senior Planner
Organisation (where relevant)	Wesiminster City Council	CBRE Planning
Address		Henrietta House Henrietta Place London
Postcode		W1G 0NB
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 type="checkbox"/>	
5.2 Justified	<input type="checkbox"/>	
5.3 Effective	<input checked="" 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.		
<p>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.</p> <p>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.</p> <p><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></p>		
<p>On behalf of our client, Royal Borough of Kensington and Chelsea Pension Fund (the Fund), CBRE has been instructed to submit representations to the Wandsworth Draft Local Plan: Publication Version.</p> <p>The Fund has a land holding within LB Wandsworth across 36-46 St John's Road and 17 Severus Road in Clapham Town Centre. The Fund purchased the site in March 2020, and we previously responded to the Pre-Publication Version of the Draft Local Plan, on 01 March 2021. Separately, we had conversations with the LB Wandsworth policy team regarding the site and were encouraged to put it forward for a site allocation at this previous stage of the consultation.</p> <p>The majority of the site is located along St John's Road, but it also faces onto Severus Road and Eckstein Road. Given the town centre location, proximity to public transport (the site has a 6b PTAL rating- meaning excellent), the relatively limited constraints that the site is subject to and the apparent development potential of the site, we consider that it is a clear and sustainable development opportunity</p>		

that should be given a specific allocation within the Local Plan. Our representations to the above consultation are made in this context.

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Proposed words:

Development proposals for tall buildings will not be supported.

Specific building heights on the site will be established through a design-led process, in accordance with strategic policy.

Comments:

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Summary

In conclusion, we continue to be supportive of the principle of the Site Allocation but believe the above amendments will serve to avoid any ambiguity in understanding the site requirements, and allow for any forthcoming scheme to be developed through the design-led approach, that optimises the site’s capacity.

It is our view that, in absence of these amendments, the site allocation will remain unclear and due to this, it is unlikely to be effective. Effectiveness is one of the tests of soundness within the NPPF. The definition of mid-rise buildings and application of this policy approach to the site will also fail to be in general conformity with the London Plan.

Given the Regulation 19 stage of the plan, our client wishes to reserve the right to be able to participate in any forthcoming Examination in Public.

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.

This has been set out in the previous section.

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.

As per our representations, we consider elements of the plan to be unsound and therefore, we wish to participate.

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:

ADAM GARCIA

For electronic responses a typed signature is acceptable.

Date:

24/02/2022



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.