



LONDON BOROUGH OF WANDSWORTH
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 7:
TOOTING
(POLICIES PM6, TO1 - TO3)

THURSDAY 17 NOVEMBER 2022

Abbreviations

CAZ – Central Activities Zone

GIS – Geographic Information System

HELAA – Housing and Economic Land Availability Assessment

LIP – Local Implementation Plan

LP – The London Plan

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

RNA – Wandsworth Town Centre and Retail Needs Assessment

UDS – Urban Design Study

VNEB – Vauxhall, Nine Elms and Battersea

WLP – Wandsworth Local Plan

Is the area strategy and are the site allocation policies for Tooting justified by appropriate available evidence, having regard to national guidance, local context, and are they in ‘general conformity’ with the LP?

The Areas Strategies in the Local Plan have been developed using a consistent approach having had regard to national guidance, the London Plan and the local context. Rather than repeating this across each of the Main Matters 3 to 11, this is set out once for the sake of brevity, in a separate Written Statement covering PM2 – PM10 inclusive. Each of the Main Matter statements in relation to each individual Area Strategy will therefore only cover matters of relevant to that place.

The Area Strategy policy (PM6) and Site Allocation policies (TOT1-TOT3) for Tooting are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

The primary sources of evidence are as follows:

- [Retail Needs Assessment](#) (SD-041)
- [Urban Design Study](#) (SD-054)
- [Local Implementation Plan](#) (SD-058)
- [St. George’s Hospital Strategy](#) (SD-088)

The below outlines how the evidence which supports the Area Strategy has been prepared and how it meets the requirements set out in the question.

Introduction

Tooting Area Strategy is in accordance with the London Plan and is defined in it as a strategic area for regeneration, and as major town centre with night-time activity of more than local significance.

In the case of Tooting, the Area Strategy covers the town centre – which is focused on the two main shopping and commercial streets of Tooting High Street and Mitcham Road – and the area of, and around, St. George’s Hospital. It is well served by public transport owing both to its location on a major crossroads and the underground station at Tooting Broadway at the heart of this area. Tooting’s High Street is one part of a longer radial road going to the heart of London, and commercial activity extends beyond the definition of the town centre. It is a similar case along Mitcham Road, though the route is less significant and there is less commercial activity beyond the natural extent. Focusing holistically on Tooting is intended to

ensure that development remains sensitive to – and enhances – the existing positive elements of the neighbourhood. Two of the three allocations are in the busy heart of the town centre, and one of these is focused on the unique markets on the High Street. The third allocation relates to the nearby Hospital.

Policy PM1 provides an overarching guide to development and also points to any specific supplementary guidance. St. George’s Hospital has a strategy for its development in the short term (SD-088) and whilst there is no conservation area for the main commercial core, the Totterdown Fields Conservation Area crosses into the 100m boundary area.

Tooting’s three allocations have a capacity derived from the HELAA, and together they provide a capacity of 206 homes, which is reflected in Policy SDS1. Further detail on how the site should come forward is set out within the individual allocations TOT1 – TOT3, which is also set within the context of other policies within the Plan (e.g. LP4, Tall Buildings).

Developing the Placemaking Policies: PM8 Balham

The Area Strategy boundary is principally based on the defined town centre boundary and the relevant Site Allocations to ensure they captured the local context as best as possible. A buffer of 100m is added to this in order to express the indicative nature of the Area Strategy boundary. In Tooting, the Hospital site is beyond the town centre boundary to the southwest, though development here should forge relationships with the town centre to the benefit of both. The buffer therefore covers Garratt Lane and the High Street south of Tooting Broadway where there is further linear commercial development.

Whilst the Area Strategies provide focus, development outside of the areas would need to be cognisant of, and have regard to, them. As discussed, the linear form of Tooting along the High Street is a case in point, as economic and commercial activity does extend demonstrably beyond this 100m line.

Tooting Area Strategy: Local Plan Evidence Base

Alongside its setting within the national framework, the policies and strategy of the London Plan and the Vision and Objectives of the Local Plan, the strategy for Tooting responds to its current context and character. Any analysis of the context and character for the Plan is informed by the comments to the Plan made by residents and people who know the centre,

and also benefitted from analysis undertaken by the Tooting Bec and Broadway Neighbourhood Forum¹.

At the current time, Tooting can be defined by:

- Distinctive growth during the 1920/30s;
- Its form as a linear town centre stretching across a cross roads;
- Vibrant and diverse town centre with religious buildings;
- Markets at its heart which reflect cultural diversity;
- A vibrant nightlife and food scene;
- Excellent transport links, but congested with through traffic;
- A generally prosperous nature with signs of deprivation.

Tooting benefits from distinctive architecture and landmarks, including numerous listed and locally listed buildings.

Although some architectural gems along Upper Tooting Road are a little neglected, resulting in a fragmented feel to the streetscape, many of Tooting’s best built assets continue to thrive in new and unexpected ways, and are still valued by a much-diversified community. The survival of these iconic buildings, coupled with Tooting’s strong sense of community, creates an opportunity to accommodate new development that restores the character by building on the strong heritage and culture of the area.

The Vision for Tooting, based upon this assessment of its character, context and assets, is set out in the Plan at para. 8.10, and features:

- the need to manage development in a sensitive manner to respect the human scale;
- to protect, enhance the cultural and creative character (including the markets);
- to preserve the setting of the town scape, and
- to reduce the dominance of vehicles.

As the London Plan identifies parts of Tooting as a Strategic Area for Regeneration, this strategy sets out a holistic approach that will steer regeneration activity and direct locally sensitive action to improve the quality of life for local people, ensuring that new development

¹ The Tooting Bec and Broadway Neighbourhood Forum were pursuing a neighbourhood plan at the time of engagement on the Local Plan, and contributed to the strategy in its earlier stages. The designation of the neighbourhood area and forum lapsed in April 2022.

is sensitive to – and enhances – the existing positive elements of the neighbourhood, both built environment and sense of community

Within the Placemaking policy, PM6, the understanding of the place combined with the analysis and general directions has given rise to a specific policy approach geared towards achieving success, couched in the wider needs of the borough. The main issues arising in PM6 are:

- Protection and enhancement of the markets;
- Views, vistas and townscape;
- Public realm, especially around heritage assets;
- Character of frontages;
- Supporting town centre economic activity (including night-time), and promoting arts and tourism.

In this respect, the key evidence specific to Tooting has been the Retail Needs Assessment (SD-041), the Local Implementation Strategy (SD-058) and the Urban Design Study (SD-054).

The Urban Design Study recognises the focus of the town along the main routes, and the vibrant character of the street frontages alongside various locally important buildings from Tooting's main period of growth at the early part of the 20th Century. It notes the distinct urban feel, with diversity, colour and interest reflected in its demographic mix and manifesting in its varied offer and reputation for food and cultural variety. It also notes the human scale (lower rise, smaller units) and the difficulties with traffic and transport volume. The UDS also draws attention to the views and vistas evident through the changing townscape, particularly those on the subtle curves of Mitcham Road towards Amen Corner and St Boniface Church. It recommends a restorative strategy to the town centre.

The Retail Needs Assessment highlights Tooting's significant assets of low vacancy, diverse retail offer and strong evening scene with a diverse demographic in the catchment, and it seeks to maintain Tooting's status as a major town centre as defined in the London Plan. Like the UDS, it recommends an approach whereby the centre is improved for pedestrians and reduces the vehicular dominance whilst protecting and improving the distinct townscape.

The LIP recognises that the High Street – in common with other radial and major roads in the borough – has high levels of pollutants, but also shows great potential as a place where pedestrian movement and cycling can be enhanced (both locally within Tooting and more strategically on cycleways). The LIP references a town centre pedestrian pilot scheme

which would aim to reduce pedestrian casualties, increase walking and improve the experience of the area. Public transport use is also high, and the LIP is mindful of the possible arrival of Crossrail 2 and a potential new station for the hospital in the longer term future.

The St. George's Hospital Strategy sets out an ambition to provide outstanding care for its patients, staff, and the communities and lays the ground for achieving this ambition. The strategy is founded on four key priorities; providing strong foundations, delivering excellent local services, closer collaboration and offering leading specialist healthcare. An estate strategy is to follow the publication of the vision, but the Local Plan makes provision for development within the site in line with that Estate Strategy. The proximity to Tooting is a key asset, and the allocation looks for improvements in public realm and access around the site whilst ensuring the functioning of the hospital.

The Spatial Area Map at 8.1 shows how the different considerations are brought together, with the Tooting High Street and Mitcham Road junction acting as an important focal point between transport routes, site allocations and commercial activity. The importance of links to the nearby hospital are demonstrated, along with a potential form of development around the hospital periphery that will also need to be integrated into the surrounding townscape and linked in with the town centre.

Tooting's Area Strategy received few representations overall during the Regulation 19 consultation. These have not resulted in significant pre-hearing proposed modifications.

Do the housing land site allocations in Tooting show how they will contribute to the achievement of the WLP's overall housing requirement of at least 20311 new homes and its timescale for delivery?

The estimated capacity and delivery for the specific housing site allocations is published in the Authority Monitoring Report on Housing and forms part of the unpublished background information of the HELAA (SD-047) ²(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 122 together with the 84 capacity of other non-allocated sites make up the total housing capacity for Tooting as shown in table 2.2 (New Home Distribution) of Policy SDS1. As set out in Policy SDS1, the Council considers that stating the overall capacity for each Area Strategy area, alongside the total

² The list of sites with capacities were not published to avoid any pre-emption of the planning application process in establishing appropriate built form and densities for sites. This is consistent with the SHLAA methodology.

capacity for the borough, is the most appropriate strategy for setting out how the borough will meet its housing requirement. Site specific capacities and details of the assessment of housing land site allocations have not been provided in the Site Allocations of the Local Plan or in the HELAA (SD-047) as it is not considered helpful and may prejudice the planning consideration of a site. This is consistent with the Greater London Authority's Strategic Housing Land Availability Assessment (SHLAA) 2017 methodology, and avoids any pre-emption of the planning application process in establishing appropriate built form and densities for sites.

However, for the purpose of assisting the Inspectors on the WLP examination process, the estimated capacity figures, and phasing for each Site Allocation are contained in Appendix 3 to written statement MM2 'Spatial Development Strategy'. Appendix 3 shows the estimated capacity for each site, which form part of the overall housing capacity figure set out in table 2.2 of Policy SDS1.

For sites with pending or approved planning permissions, the assessment of development potential relied on the levels of development identified within the permission, factoring in a probability of deliverability for pending permissions. For other sites, estimates of development potential, suitability, availability and achievability followed the methodology as set out in the HELAA (SD-047), which followed the methodology within NPPG Housing and Economic Needs Assessment 2020.

Estimates for housing potential on sites are derived from the Council's Urban Design Study (UDS) (SD-054), which applies a design-led approach to identifying capacity in accordance with Policy D3 of the London Plan. The methodology used for estimating the development potential is set out in greater detail in the UDS in Appendix H (SD-054). The capacities identified within the UDS are then adjusted, as appropriate, to account for existing residential uses and/or alternative uses anticipated on site, including those contributing to the economic capacity. It is important to note that the estimates derived from the UDS are indicative for the sites without planning permission and do not give a definitive number of units to be provided on site, as the ultimate capacity will be determined by the assessment of a planning application in accordance with the Local Plan.

For each site allocation a judgement was made on whether development on each site is likely to be viable and when it would likely come forward for development. Sources of information supporting this judgement included: (1) The Urban Design Study (SD-054) (2) The Wandle Delta Masterplan, which the Council has adopted as a Supplementary Planning Document (SD-076); (3) Pre-application records (which are confidential); (4) The results

from the call for sites consultation; and (5) Knowledge of the site and landowner intentions and propensity to develop the land. (This involves an assessment of the 'history' of development of the site, for example, if it has previous planning applications submitted/approved or any pre-application discussions. Or if there are any known ownership issues that may make it less likely to come forward until resolved). Further review, site by site, of the housing and economic capacity has also been undertaken to account for any changes required as a result of new evidence or policies relating to: (1) Physical constraints based on GIS hazard, constraint and policy layers in the Local Plan (which include flood zone layers, local views, policy areas and protected views); (2) Existing built form and building heights; (3) Existing heritage and sensitivity to growth (based on on-site or adjacent designated heritage assets, and findings of the Urban Design Study); and (4) Ownership, based on known constraints. (This is following the NPPG on HELAA, if there have been any changes to the ownership of the site or legal impediment for development.)

Estimated timescales for housing delivery were assigned to the phases used in the London SHLAA, for comparability: (1) 2019/20–2023/24; (2) 2024/25–2028/29; (3) 2029/30–2033/34; and (4) 2034/35–2040/41. Development phasing was then annualised to each year between 2019/20 and 2039/40 inclusive, to allow for comparison to the proposed Plan period of 2023/24 to 2037/38. Housing delivery phasing details for the Site Allocations in Tooting are contained in Appendix 3 to written statement MM2 'Spatial Development Strategy'.

On the majority of the Site Allocations, the Council is already in discussion with the landowners, and it would be considered inappropriate to be more prescriptive within the Site Allocations, such as setting out a range of residential units or commercial floorspace to be delivered, as these discussions need to take place with the relevant landowners on a site-by-site basis, informed by discussions such as on site specific circumstances, local needs and viability, to ensure flexibility and effective delivery. Some of the sites represent longer-term opportunities, for key sites due to their siting or size, where the Plan seeks to influence development should they come forward through planning, and it would be unrealistic to specify content at this early stage.