



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

**MAIN MATTER 12:**  
**OUTSIDE THE SPATIAL AREAS**  
**(POLICIES OUT1 - OUT6)**

**TUESDAY 22 NOVEMBER 2022**

**Abbreviations**

GIS – Geographic Information System

HELAA – Housing and Economic Land Availability Assessment

LP – The London Plan

NHS – National Health Service

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

SHLAA – Strategic Housing Land Availability Assessment

UDS – Urban Design Study

**Are the site allocation policies for Outside the Spatial Areas justified by appropriate available evidence, having regard to national guidance, local context, and are they in ‘general conformity’ with the LP?**

The site allocation policies (OUT1 - OUT6) sit outside any of the Spatial Area boundaries in the Local Plan and are justified by appropriate available evidence, having regard to national guidance, local context, and they are in ‘general conformity’ with the LP. The below outlines how the evidence which supports the site allocations has been prepared and how it meets the requirements set out in the question.

Outside of the spatial area there are six allocations. Each of these sites has been assessed through the HELAA process and partially contribute to the overall housing capacity of 1,190 dwellings of sites outside of spatial areas, which is reflected in Policy SDS1. Further detail on how each site should come forward is set out within OUT1 – OUT6, and these are set within the context of other policies within the Plan (e.g. LP4, Tall Buildings).

The site allocations found outside of the spatial areas are considered likely to make a significant contribution towards meeting the borough’s development needs. Their justifications can be found below:

OUT1 Balham Health Centre, 120 - 124 Bedford Hill, Balham - Location that would benefit from site-specific policy to secure the best development outcome with a particular opportunity for intensification that retains health services.

OUT2 259-311 Battersea Park Road, Battersea - Location that would benefit from site-specific policy to secure the best development outcome with a particular opportunity for intensification whilst retaining retail and community services. Also benefit from additional site-specific guidance to ensure the placemaking aims and objectives of the Local Plan are met.

OUT3 Springfield Hospital, Burntwood Lane / Glenburnie Road - An existing site allocation which has outstanding planning permissions and masterplan guidance that was needed to be enforced.

OUT4 Randall Close Day Centre and adjacent Surrey Lane Estate Car Park - Previously included in the Wandsworth Riverside site allocations and then more appropriately captured with these site allocations as it is not within the Thames Policy Area.

OUT5 Bridge Lane Medical Group Practice, 20 Bridge Lane, Battersea - Location that would benefit from site-specific policy to secure the best development outcome with a particular opportunity for intensification retaining and expanding health services. Part of NHS estate.

OUT6 Hazel Court, Haydon Way, Battersea - Location that would benefit from site-specific policy to secure the best development outcome with a particular opportunity for intensification. Also benefit from additional site-specific guidance to ensure the placemaking aims and objectives of the Local Plan are met. Part of NHS estate.

The site allocations outside the spatial areas received no representations of significance during the Regulation 19 consultation.

***Do the housing land site allocations Outside the Spatial Areas show how it 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) <sup>1</sup>(Please see the footnote below for explanation why this has remained unpublished). The Site Allocation capacity of 472 together with the 718 capacity of other non-allocated sites make up the total housing capacity for sites Outside the Spatial Areas 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 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

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<sup>1</sup> 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 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 sites Outside the Spatial Areas 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.