



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

MAIN MATTER 15:
PROVIDING FOR WANDSWORTH'S PEOPLE
(POLICIES LP15 - LP22)

WEDNESDAY 23 NOVEMBER 2022

Abbreviations

CCG - Clinical Commissioning Group

LP – The London Plan

NCMP - National Child Measurement Programme

NHS - National Health Service

NPPF – National Planning Policy Framework

NPPG – National Planning Practice Guidance

OHID - Office for Health Improvement and Disparities

SPG - Supplementary Planning Guidance

WLP – Wandsworth Local Plan

Are the requirements of the Providing for Wandsworth’s People policies justified by appropriate available evidence, having regard to national guidance, local context, and the London Plan?

The requirements of the policies in Chapter 16 ‘Providing for Wandsworth’s People’ 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:

- [SD-061 Active Wandsworth Strategy 2017-2022](#)
- [SD-062 Health and Wellbeing Strategy 2015-2020](#)
- [SD-063 Health and Care Plan 2019-2021](#)
- [SD-064 NHS Long Term Plan \(January 2019\)](#)
- [SD-065 Arts and Culture Strategy 2021-2031](#)
- [SD-066 Cultural Strategy for Battersea and Nine Elms Summary \(2017\)](#)
- [SD-071 Cultural Planning Guidance Lombard Road/York Road Riverside Focal Point Area \(December 2018\)](#)
- [SD-088 NHS St Georges University Hospitals Delivering Outstanding Care 2019-2024](#)

Chapter 16 ‘Providing for Wandsworth’s people’ sets out policies to secure a local environment which promotes physical activity and mental well-being through new development, and seek to improve people’s economic, social and environment conditions.

The NPPF (paragraph 92) requires Local Plans to achieve healthy, inclusive and safe places. In Wandsworth, this is a key priority for the Local Plan as it plays an important role in influencing the built and natural environment and therefore plays a key role in the physical and mental well-being of the population.

Paragraph 93 of the NPPF specifically states planning policies should plan positively for the provision and use of shared space, community facilities, public houses, open space and other local services, and guard against the unnecessary loss of valued facilities and services. The Plan is therefore consistent with national policy. The approach accords with London Plan Policies S1 and S2, recognising additional and enhanced social infrastructure provision is required to meet the needs of London’s growing and diverse population, and the Mayor’s Social Infrastructure SPG (2015).

In accordance with national and London Plan policy the Local Plan recognises that there are significant benefits to be gained by promoting active travel, encouraging community

cohesion, supporting the arts and culture sector, ensuring the provision of new high-quality and well-designed open space and public realm and supporting biodiversity. The Local Plan’s Spatial Strategy provides the overarching framework for securing the delivery of these benefits for all.

The NPPF (paragraph 8) sets out the social dimension to sustainable development, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being. One of the core planning principles (paragraph 20) is that Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for community facilities (such as health, education and cultural infrastructure). The policies contained in this Chapter reflect the NPPF in this regard.

London Plan Policy HC7 seeks to protect existing pubs that have cultural value, recognising the important role they play in local communities. The Council has set out in Policy LP16 how it will protect public houses and bars where they are of historic or architectural interest and/or of community value. The listing of a public house or bar as an Asset of Community Value will also be a material planning consideration.

Policy LP17 ‘Social and Community Infrastructure’ is relevant to a wide range of essential and highly valued social and community infrastructure uses that form an important part of sustainable development and healthy communities. These are important to protect, and secure future provision to accompany and support housing and economic growth. This is particularly important within the borough context of limited land supply, high land values and development pressures, such that lower value uses such as these may find it hard to compete against higher value uses.

To ensure that land is used effectively when considering the location and use of community facilities and services, Policy LP17 supports the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities; for example, where the provision of services is being reconfigured. Supporting the co-location of different forms of infrastructure helps these facilities and services to develop and modernise in a sustainable way so they can benefit from shared proximity to the communities they serve.

Policy LP17 is in general conformity with London Plan Policy S1 which ensures that boroughs are effectively supported to appropriately safeguard against the unnecessary loss of social infrastructure facilities in their decision making so they can sustainably meet the identified needs of their communities. Policy S1 directs boroughs to refuse proposals that would result in the loss of social infrastructure in an area of defined need, unless a realistic

proposal for the re-provision of facilities that continue to meet the needs of the neighbourhood and wider community is proposed or the loss is part of a wider public service transformation plan that creates infrastructure to meet future population needs or to sustain and improve services. LP17 Part B Criteria 1-6 set out where the loss of social or community infrastructure will be resisted.

London Plan Policy S2 provides an effective and justified approach to supporting the provision of health and social care facilities in London. The Policy provides a strategic framework that ensures boroughs take a proactive, flexible and collaborative approach to the delivery of facilities to ensure all Londoners have access to high quality health and social care services. Policy LP17 is deliverable over the Plan period through joint working between London boroughs, Clinical Commissioning Groups (CCGs) and other NHS and community organisations to support the provision of health and social care facilities to address local needs, expected future changes in need and barriers to improving health and wellbeing.

The NPPF highlights the role that culture plays in creating strong, vibrant and healthy communities through the creation of a high-quality built environment that allows for local services to be reflective of community needs to support their cultural wellbeing.

Plans should take account of and support local strategies to improve cultural wellbeing for all, delivering sufficient facilities to meet local needs.

The NPPF also recognises the role culture plays in building a strong, competitive economy by encouraging the planning system to plan positively for the location, promotion and expansion of clusters of creative industries. It supports the provision of sufficient cultural uses to meet the scale and type of cultural development needed in town centres.

Policy LP18 ‘Arts, Culture and Entertainment’ supports the retention of existing cultural attractions and provision of new cultural venues in town centres and places well-connected by public transport. This is in general conformity with London Plan Policy HC5 which is also supported by the Mayor’s Culture Strategy, Culture for all Londoners, which highlights the importance of Londoners being able to access a wide range of cultural places and spaces and the need to protect and promote culture through a range of initiatives.

Policy LP18 Part A.2 reflects London Plan HC5 which supports boroughs to identify and enhance new and existing clusters of locally important cultural uses, called Cultural Quarters. LP18.3 is in accordance with London Plan HC5 which encourages boroughs to increase their cultural offer by using vacant properties and pop-ups for meanwhile cultural and creative uses and to support new cultural venues in significant areas of regeneration. In

addition, the policy supports the Council's Art and Culture Strategy 2021-2031 and seeks to maximise a range of arts and cultural opportunities across the borough.

Policy LP15 (Health and Wellbeing) - With regard to new hot food takeaway shops, is the proposed 400m school exclusion zone justified by appropriate available evidence?

NPPF paragraph 8 seeks to use the planning system to promote strong, vibrant and healthy communities that reflect the community's needs and supports its health and well-being.

The NPPF also sets out explicit policy requirements pertinent to promoting healthy spaces. Section 8 of the NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which: 'enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, **access to healthier food**, allotments and layouts that encourage walking and cycling'.

One of the NPPF's core planning principles (paragraph 93. B.) is that plan-making should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

The NPPG on Health and Wellbeing (paragraph 002) states the link between planning and health has been long established. The built and natural environments are major determinants of health and wellbeing. One of the issues that can be considered in plan-making in respect of health and healthcare infrastructure is promoting access to healthier food.

The NPPG (paragraph 004) also sets out that local planning authorities can have particular regard to proximity to locations where children and young people congregate such as schools, community centres and playgrounds, recognising the role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices.

Rising obesity levels are a key issue for the health and wellbeing of children. Excess weight often starts children on the path to health problems that were once considered adult problems including type 2 diabetes, high blood pressure and high cholesterol. Childhood obesity can also lead to poor self-esteem and depression. Obesity is a complex health issue

that stems from a variety of causes.¹ One key determinant of obesity is our environment. The food available to us in our environment is likely to influence what we and our children eat and subsequently is a contributory factor to our weight. This includes establishments selling energy dense and nutritionally poor foods (commonly referred to as ‘fast food’).²

The London Plan [topic paper on hot food takeaways](#) produced in 2018 highlights the prevalence, impact and causes of obesity; and outlines the role of the Mayor of London and local authorities in improving the health of the local population. It therefore forms a key part of the evidence base to support Policy LP15. London Plan Policy E9 (Section D) Retail, markets and hot food takeaways, sets out that development proposals containing A5 hot food takeaways uses should not be permitted where these are within 400 metres walking distance from entrances and exits of an existing or proposed primary or secondary school.

Policy LP15 is in general conformity with the London Plan in order to help tackle children’s level of obesity in specific areas and schools.

In Wandsworth, National Child Measurement Programme (NCMP) data³ is not available for 2019/20 in relation to Reception (due to data collection restrictions during COVID). The Wandsworth figure for Year 6 is not significantly different from the England average as shown in Table 1 ‘Office for Health and Improvement Disparities: [Public Health Profiles](#)’ below. However, the Table does show that for Wandsworth there is an increase in overweight prevalence from years 2017-2019 (3-year combined data) for Reception of 18.6% to 33% and in Year 6 (77.4% increase). Similarly, prevalence of obesity (including severe obesity) from the 3-year combined data shows an increase from 7.4% in Reception to 19% (156.8% increase).

National NCMP data for 2020/21 highlights that obesity prevalence among children living in the most deprived areas was more than double that of those living in the least deprived areas⁴.

¹The Office for Health Improvement and Disparities (OHID) have produced an ‘[All our Health](#)’ guide to help promote wellbeing and prevent ill health. It details why childhood obesity and excess weight are significant health issues for children.

² The [UK Health Security Agency](#) addresses the wider determinants of health to improve health equity and overall health

³ The National Child Measurement Programme (NCMP) – overseen by the Office for Health Improvement and Disparities and analysed and reported by NHS Digital – measures the height and weight of children in England annually and provides data on the number of children in reception and year 6 who are underweight, healthy weight, overweight, obese or severely obese.

⁴ [NHS digital data](#) measures the height and weight of children in England annually and provides data on the number of children in reception and year 6.

Table 1: Office for Health and Improvement Disparities: [Public Health Profiles](#)

Indicator	Period	Wandsworth			Region England			England		
		Recent Trend	Count	Value	Value	Value	Worst	Range	Best	
Reception: Prevalence of overweight (including obesity)	2019/20	–	-	*	21.6%	23.0%	31.8%		14.9%	
Year 6: Prevalence of overweight (including obesity)	2019/20	➔	-	35.9%*	38.2%	35.2%	44.7%		22.0%	
Reception: Prevalence of obesity (including severe obesity)	2019/20	–	-	*	10.0%	9.9%	14.6%		4.7%	
Year 6: Prevalence of obesity (including severe obesity)	2021/22	–	-	-	-	-	-	-	-	
Percentage of adults (aged 18+) classified as overweight or obese	2020/21	–	-	49.7%	56.0%	63.5%	76.3%		44.0%	
Reception: Prevalence of obesity (including severe obesity), 3-years data combined	2017/18 - 19/20	–	450	7.4%*	10.1%	9.7%	14.3%		5.2%	
Reception: Prevalence of overweight (including obesity), 3-years data combined	2017/18 - 19/20	–	1,130	18.6%*	21.8%	22.6%	30.0%		15.3%	
Year 6: Prevalence of obesity (including severe obesity), 3-years data combined	2017/18 - 19/20	–	1,015	19.0%*	23.3%	20.4%	29.4%		11.0%	
Year 6: Prevalence of overweight (including obesity), 3-years data combined	2017/18 - 19/20	–	1,765	33.0%*	38.0%	34.6%	44.7%		22.1%	
Obesity in early pregnancy	2018/19	–	-	10.8%	17.8%	22.1%	30.5%		5.6%	
Percentage of adults (aged 18+) classified as obese	2020/21	–	-	14.7%	19.5%	25.3%	40.3%		10.5%	

Restricting permission for additional new hot food takeaways around schools will prevent further overconcentration of hot food takeaways in Wandsworth. It will also make an important contribution to promoting healthy eating by helping to reduce access to unhealthy foods near schools, support the borough’s Healthy Schools Programme as well as to reduce childhood obesity levels and creation of healthier environments through the planning policy process.

Policy LP16 (Public Houses and Bars) - Should the wording of the policy allow for re-provision?

No. The Council does not advocate such an approach. The policy aims to prevent the loss of Public Houses and Bars of historic or community value and re-provision would undermine this approach.

Policy LP16 ‘Public Houses and Bars’ is in general conformity with London Plan policy HC7B which does not refer to re-provision and instead states;

‘Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.’

Paragraph 7.7.2 of the supporting text to London Plan Policy HC7 which states that:

'... pubs are under threat from closure and redevelopment pressures, with nearly 1,200 pubs in London lost in 15 years.'

The Council places great importance on keeping public houses and bars at the heart of the community. Therefore, the Council's position is to protect public houses and bars unless otherwise indicated by material consideration or they meet criteria LP16. B1 and 2.

By allowing for re-provision of public houses this could lead to, for example, unlisted public houses and bars which are important community focal points within the locality being lost as part of redevelopment.

LP20 (New Open Space) - Is the wording of the policy sufficiently clear as to when a financial contribution from major developments may be necessary or acceptable?

The Council considers that the wording of the policy is sufficiently clear as to when a financial contribution from major developments may be necessary or acceptable. The policy reflects the importance of providing new open space and makes it clear that the 'default' position is that new open space should be provided on-site. The policy does, however, provide flexibility if it is clearly demonstrated through evidence at the planning application stage that such an approach is not feasible or appropriate. In such cases a financial contribution will be required to support appropriate open space or public realm enhancements in the locality.

Do Policies LP15 – LP22 provide clear direction as to how a decision maker should react to a development proposal?

Yes, Policies LP15 – LP22 provide clear direction how to react to a development proposal.

The Council consider that Policies LP15 to LP22 are in accordance with Paragraph 16 of the NPPF, which requires that they are, 'clearly written and unambiguous', and drafted in such a manner that it is 'evident how a decision maker should react to development proposals'.

Policies are positively worded unless local evidence suggests an alternative approach, and – where appropriate – set out the requirements for decision makers using a criteria-based approach. The threshold to which a policy applies are clearly set out. The justification for each policy and how it will be applied is clearly set out within the relevant supporting text.

The policies are clearly linked to the relevant environmental, social and economic objectives of the Local Plan, as set out in Chapter 2. These objectives support the achievement of the Local Plan's vision and form the basis of its spatial strategy. The Council has assessed the clarity and intent of the policies using the Planning Advisory Services Soundness Self-

Assessment Checklist (SD-015), and in particular Q44 which asks, ‘Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?’

Following the public consultation on the Pre-Publication (Regulation 18) Local Plan, changes were made to Policies LP15 to LP22, including to expressly address matters of clarity. The Council’s detailed responses and the outcome of the representations submitted with respect to the Local Plan are set out in the Council’s Statement of Consultation Regulation 18, Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comments (SD-004), with those specific to policies LP15 to LP22 from pages 330 to 362.

The Publication (Regulation 19) Local Plan (SD-001) has been submitted to the Secretary of State for Examination. However, the Council has reviewed the representations received and have set out detailed comments within the Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council’s Responses (WBC-007 and WBC-008). The responses identify, where considered appropriate, a small number of specific changes to the wording of policies and the supporting text for the sake of clarity. These are set out within the Schedules of Proposed Main and Additional Modifications Suggested by the Council (WBC-010 References PPMM/089 - PPMM/090 and WBC-011 Reference PPAM/075) respectively.