

JD/AC/P7120
26 October 2022

London Borough of Wandsworth
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

Via Email: bankssolutionsuk@gmail.com

Dear Sir/Madam,

Examination of the Wandsworth Local Plan (November 2022)
Hearing Statement submitted on behalf of Downing
Main Matters 3, 13 and 16

This Hearing Statement has been prepared by Rolfe Judd Planning on behalf of the Downing in reference to the hearing sessions for the examination of the Wandsworth local Plan (“WLP”) which are due to commence on the 15th November 2022.

The Statement principally responds to the following matters set out within the Inspector’s Matters, Issues and Questions (“MIQs”) for Examination:

- **Main Matter 3:** Wandsworth Town (Policies PM2, WT1 to WT22)
- **Main Matter 13:** Achieving High Quality Places (Policy LP1 – LP9)
- **Main Matter 16:** Providing Housing (Policies LP23 to LP32)

We understand that LB Wandsworth will be providing a response to all of the questions raised. Our response is intended to provide additional clarity/information to particular questions within Matters 3, 13 and 16.

This Statement builds on the previous representations submitted on behalf of Downing to the earlier rounds of public consultation on the emerging Wandsworth Local Plan. Downing have a significant interest in the Site Allocation WT4: Gasholder Cluster, in particular the land at 2 Armoury Way, SW18 1SH (“the site”) at the southern end of the site allocation. These representations principally focused on the following matters in relation to the site:

- **Policy LP4:** Tall and Mid-rise buildings
- **Site Allocation WT4:** Gasholder Cluster
- **Policy LP28:** Purpose Built Student Accommodation

The Local Plan Publication version will directly influence and impact the future development of this site and as such are keen to discuss the impact of the policies with the Council to ensure these are

Architecture Planning Interiors

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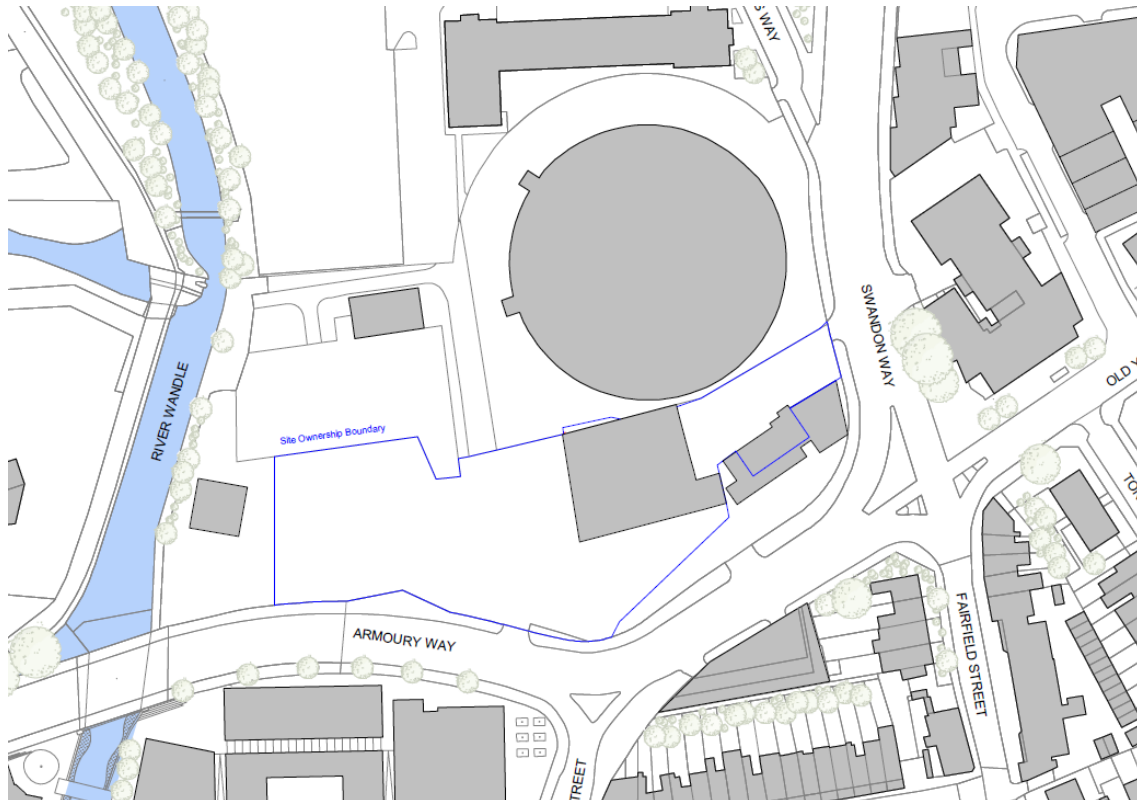
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appropriate to the area. Downing are currently exploring development options for the site, and have been in pre-application discussions with the London Borough of Wandsworth.

For ease, the site (known as 2 Armoury Way) within the ownership of Downing is outlined below in blue:



Statements and Attendance

Appended to this letter are the Statements relating to the three matters.

We look forward to the opportunity to attend the EiP and discuss these matters further at the forthcoming hearing sessions on Matters 3, 13 and 16 in November 2022

Should you have any questions, please do not hesitate to contact the undersigned.

Yours faithfully

Jan Donovan

For and on behalf of
Rolfe Judd Planning Limited

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Main Matter 16: Providing Housing (Policies LP23 to LP32)

- **Question 1:** *Are the requirements of the Housing policies justified by appropriate available evidence, having regard to national guidance, and local context, and meeting the requirements of the London Plan?*

Policy LP28 is not consistent with the London Plan (2021) and therefore does not meet the tests set by Paragraph 35 of the NPPF.

London Plan Policy H15 requires the majority of the bedrooms including all of the affordable student accommodation to be secured through a nomination agreement for occupation by students of one or more higher education provider. Paragraph 4.15.3 states that *'there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed'*

Draft Policy LP28 Part 2 states that *'proposals for PBSA will be supported where the development is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth.'* This policy is unduly restrictive and would not be in accordance with the London Plan.

The wording of LP28 Part 2 restricts new PBSA to the borough of Wandsworth 'or a reasonable travelling distance of Wandsworth', which would not be in line with the London Plan. Furthermore, London Plan Paragraph 4.15.3 clearly states that the strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period. There is a need for more student accommodation to serve the strategic needs of London, not just the borough of Wandsworth. It is not considered that Policy LP28 meets the test for being effective, in accordance with the NPPF Paragraph 35.

Downing consider that LP28 Part 2 is unduly restrictive and would not meet the tests of the NPPF in that it is not effective or consistent with the London Plan. LP28 Part 2 should be deleted.

Recommendation

Amendments sought as follows:

1. Delete Part 2 of Policy LP28.