

Statement of Common Ground Between

London Borough of Wandsworth and

The Mayor of London /  
Greater London Authority

08 November 2022

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## 1. Introduction

A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Wandsworth's draft Local Plan is '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.

The Mayor of London submitted a number of representations to the Publication Local Plan Consultation (January 2022). This Statement of Common Ground seeks to establish areas of agreement between the London Borough of Wandsworth and the Mayor (Greater London Authority, GLA) and proposes minor changes to the Submission Local Plan prior to public examination. The Inspector is asked to consider these changes, which are acceptable to both parties. The Statement also identifies those areas where further discussion and agreement may be required during the examination itself.

This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.

It seeks to provide clarification of the extent to which matters raised in the Mayor's Regulation 19 representations have been addressed through ongoing collaboration and proposed clarifications and in-principle agreed modifications to the Borough Local Plan. It also clarifies the extent to which matters raised by the Mayor are matters of general conformity or general comment.

Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating. It forms part of the evidence to demonstrate compliance with the 'duty to cooperate'. The document is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.

The Wandsworth Local Plan (Regulation 19) was submitted to the Secretary of State on 29 April 2022.

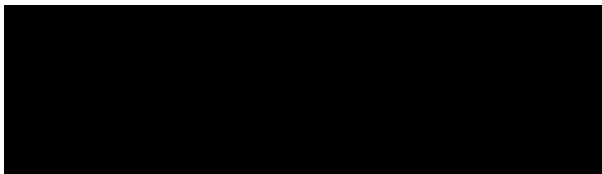
## 2. Parties Involved

This SCG has been prepared by Wandsworth Council in agreement with the Mayor of London, represented by the Greater London Authority (GLA). It addresses strategic spatial policies to be addressed directly by collaboration with the GLA. The Council is engaged with them on strategic matters on an on-going basis.

### 3. Signatories

**London Borough of Wandsworth** agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed:



Name and Position:

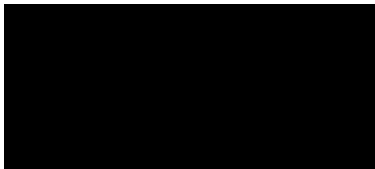
Andrea Kitzberger-Smith

Spatial Planning and Design Team Manager

Date: 08/11/2022

The **Greater London Authority** agree to matters referred to in this document which directly impact them, as outlined in the 'Strategic Matters' section.

Signed:



Name and Position:

Lucinda Turner

**Assistant Director of Planning**

Date: 08/11/2022

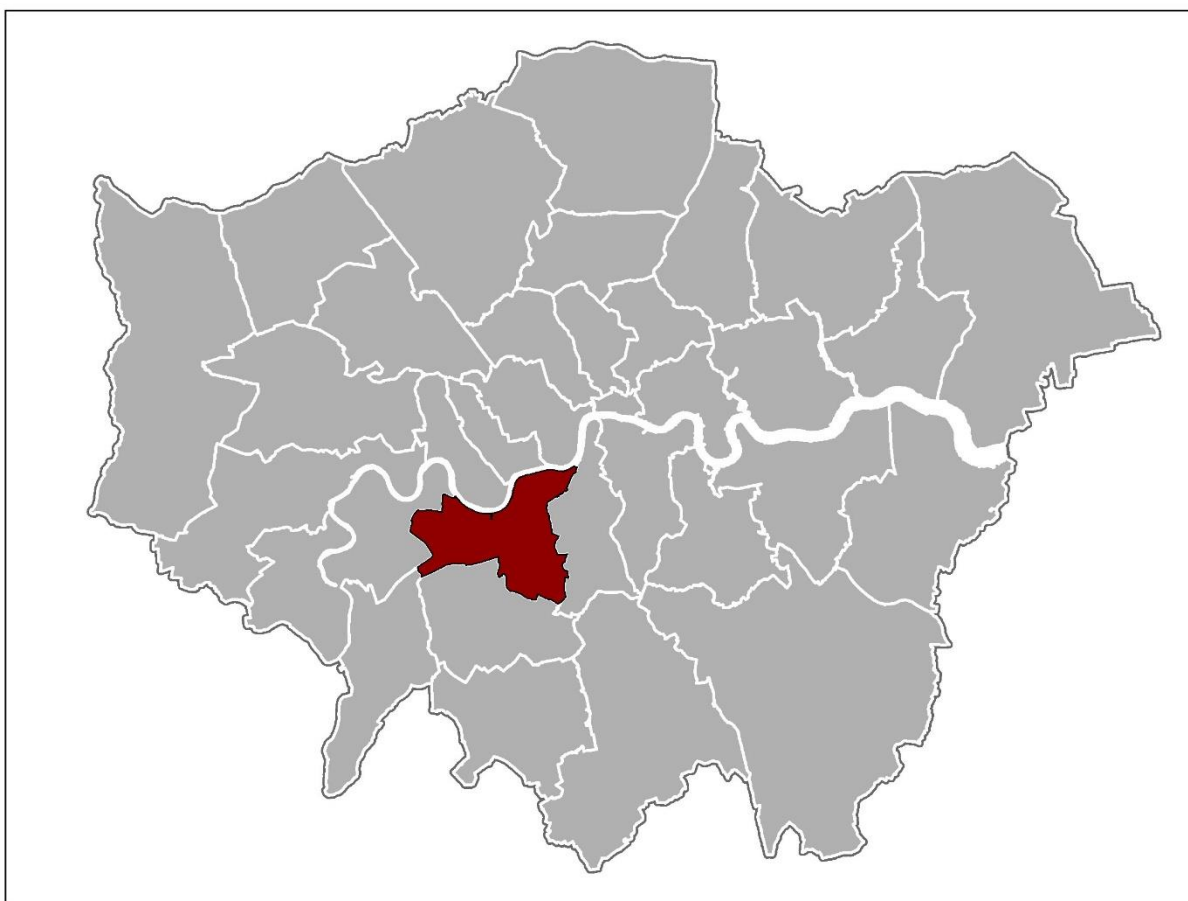
## 4. Strategic Geography

This section sets out the factual position regarding cross boundary matters.

Sitting in south-west London, Wandsworth is an inner London borough bordered by the London Boroughs of Lambeth, Merton and Richmond and the Royal Borough of Kingston Upon Thames and, across the River Thames, the London Borough of Hammersmith and Fulham, Westminster City Council and the Royal Borough of Kensington and Chelsea.

The GLA is the strategic planning authority for the whole of Greater London, and their operating area covers all 32 boroughs, the City of London Corporation and the Mayoral Development Corporations.

The area shown in the map below has been identified as the strategic planning area for the purposes of the SCG, with the borough of Wandsworth shown in red, and the area of the remaining London boroughs shown in grey. Clockwise from the immediate west, Wandsworth is bounded by Richmond, Hammersmith and Fulham, Kensington and Chelsea, Westminster, Lambeth, Merton and Kingston.



### ***The London Plan***

The London Plan is the spatial development strategy for London, produced by the GLA on behalf of the Mayor of London. It was formally published on the 2 March 2021, and now forms part of London Borough of Wandsworth's (LBW) Development Plan and contains the most up-to-date policies.

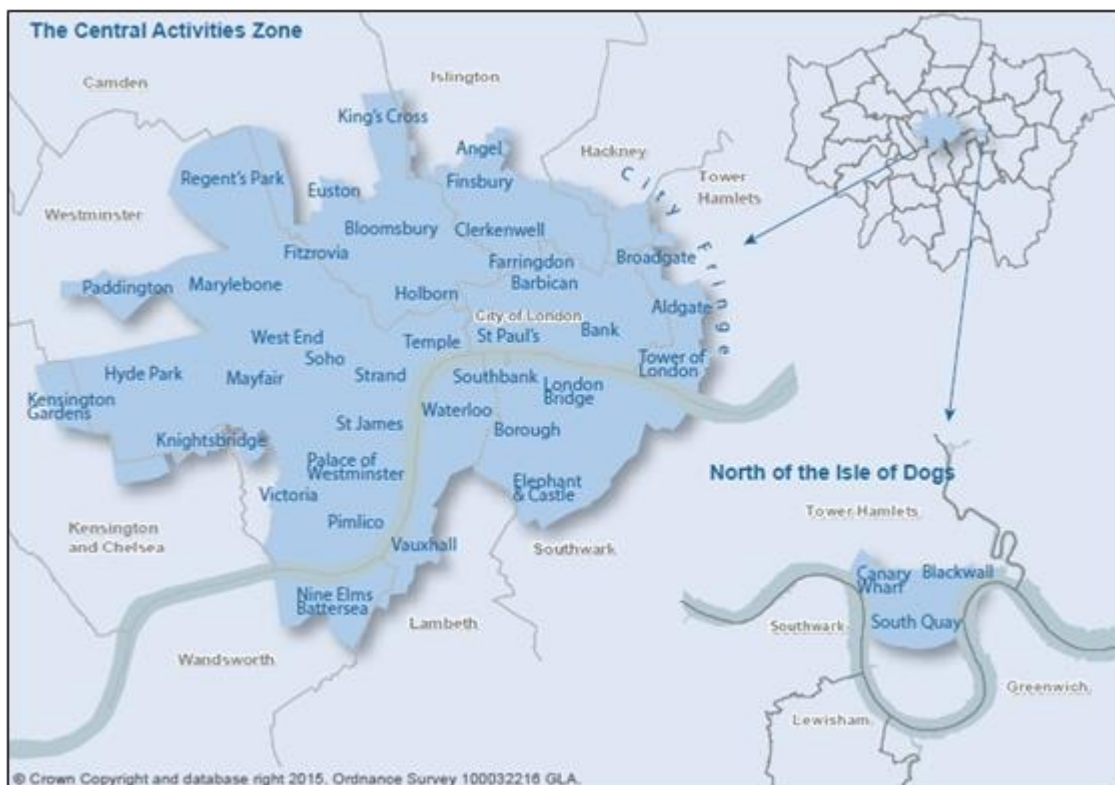
Every London borough local plan must be in **general conformity** with the published London Plan, and the GLA determines whether this has been achieved, or not, and in the case of the latter, where

differences exist. Together, the policies in the London Plan and in each borough’s Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.

**Shared Planning Matters**

*Central Activities Zone*

The London Plan identifies a large area of central London as the Central Activities Zone (CAZ), recognising its contribution to the country’s economy and the concentration of businesses, services and other activities taking place within it. The London Plan protects this area (defined in the map below) in recognition of the agglomeration that results in exceptional productivity and national benefits, which warrants a different or tailored approach to the application of national policy to address its distinct circumstances.



Within Wandsworth, the CAZ area encompasses the Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA). The aims and objectives for the CAZ, as expressed in the London Plan, are interpreted within Local Plans by constituent boroughs to ensure conformity with the London Plan.

*Opportunity Areas*

The London Plan identifies areas that will see the most significant change as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs. There are two Opportunity Areas within Wandsworth, one of which is existing (VNEB), and the other is emerging and identified in the Publication version of the Local Plan (Clapham Junction).

The VNEB OA crosses the border between Wandsworth and Lambeth. The London Plan states that it has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development.

The Clapham Junction Opportunity Area has been identified to capitalise on both the longer term objectives which would be brought about through the planned Crossrail 2 route through Clapham Junction railway station, and shorter term objectives including the improvements to the station interchange and nearby mixed use development and regeneration opportunities which would allow for a co-ordinated approach for future development.

#### *Strategic Areas for Regeneration*

As outlined by London Plan policy SD10, there are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. The London Plan identifies these neighbourhoods as Strategic Areas for Regeneration (SARS). Wandsworth has a SARS defined in Roehampton adjacent to the boundary with Richmond.

#### *Housing Market Area*

Housing need is a strategic issue dealt with at the regional level in London by the Mayor in the London Plan. Through their own local plans, authorities must plan to meet or exceed their London Plan target to ensure general conformity with it. The London Plan sets out an expectation for affordable housing provision across the city on private and public sites, and sets out an expectation in terms of type and tenure split, seeking to meet the overwhelming need for social rented housing alongside meeting intermediate housing.

#### *Town and Local Centres*

The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them. The Wandsworth Local Plan identifies five town centres – Wandsworth Town, Putney, Balham, Clapham Junction and Tooting – and beneath this it also identifies local centres and important local parades within the borough. (The London Plan identifies Battersea Power Station as a future CAZ retail cluster).

#### *Provision of energy (including heat)*

The London Plan states that boroughs should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals within London (see Policy SI3, Energy Infrastructure). It states that development plans should identify the need, and suitable sites for, any necessary infrastructure requirements such as energy centres, energy storage and upgrades to existing infrastructure. Development plans should also identify existing, and propose locations for, heating and cooling networks.

The Mayor has established the London Heat Map as a tool to help this process, and has identified Heat Network Priority Areas, which can be used to indicate where the heat density is sufficient for heat networks to provide a competitive solution for heat provision. Wandsworth is included within a Heat Network Priority Area. The Heat Map also identifies the proposed Heat Network within the VNEB Opportunity Area.

#### *Green infrastructure*

Wandsworth contains some significant areas of Metropolitan Open Land that form part of the city-wide network of open spaces. This resource includes all of the major commons and parks, including Clapham Common, Lambeth and Streatham Cemeteries, Wandsworth Park and Wandsworth Common. Wandsworth also contains significant historic parks and gardens, including Springfield Hospital and part of Wimbledon Park.

#### *River Thames*

The Thames runs along the northern boundary of Wandsworth. The London Plan encourages the designation and maintenance of Thames Policy Areas, and defines these at Policy SI14 (and diagrammatically at Figure 9.7). Within Wandsworth, there are two defined areas – Hampton to Wandsworth and Wandsworth to Bermondsey – which require joint working with the relevant neighbouring authorities.

Wandsworth has five protected wharves (Cringle Dock, Pier Wharf, Middle Wharf, Smuggler's Way Wharf, Kirtling Wharf).

#### *Westminster World Heritage Site*

Wandsworth is a stakeholder borough to reflect its role in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World Heritage Site (Westminster Abbey and the Palace of Westminster) and its setting. The Vauxhall, Nine Elms, Battersea Opportunity Area Planning Framework (OAPF) sets out a tall buildings strategy which supports the emerging cluster at Nine Elms and Battersea. It establishes a series of parameters, which respond to the need to protect the setting of the Palace of Westminster World Heritage Site from key river prospects including Waterloo, Hungerford and Westminster Bridges.

Wandsworth borough contains one strategically important linear view defined in the London Plan (Policy HC3) between King Henry VIII's Mound (in neighbouring Richmond) and St. Paul's Cathedral. The view crosses Wandsworth in the north-western corner of the borough over Roehampton and West Putney.

## Summary of matters raised by the GLA

Development Plan Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the earlier Wandsworth Local Plan Full Review Issues Document 2018 on 6 February 2019 and on the Pre-Publication Regulation 18 Consultation Version, November 2020.

In general terms, the Mayor welcomes the borough's clearly set out Local Plan vision and objectives, and the 14 principles, applied within place approaches comprised of Placemaking, Smart Growth and People First – which are carried through into area strategies.

The draft Plan divides the borough into character areas, each with their own area specific strategy, which respond to the unique characteristics, context and growth aspirations of each of these sub-areas, and which include site allocations. General development policies follow. The Mayor **agrees** that the overall approach is one which is aligned with Good Growth objectives and is welcomed. The Mayor notes LBW's Covid 19 recovery plan, and draws attention to his pandemic recovery missions.

The Mayor notes and welcomes the inclusion of Policy SDS1 which sets out the overall Spatial Development Strategy. This now includes a housing target of 20,311 new homes over the plan period, including 1,950 new homes per annum up until 2028/29, of which small sites comprise 414 per annum. **This aligns with Wandsworth's targets in the London Plan (including Policy H2 on small site allocations) and is welcome.** The plan period has also been clearly indicated (to 2038) in SDS1. Site allocations are set out clearly on maps and some additional detail has been provided to indicate the potential of sites to accommodate growth.

It is noted that the promotion of the economy and local employment is a main objective of the plan, and while the commitment to a net increase in industrial floorspace expressed in SDS1 (Part E 3) is supported, the Mayor has **broader general conformity concerns regarding the provision of non-industrial uses in SIL and concerns over the deliverability of this strategy.** These are discussed in greater detail below.

The GLA's officers are happy to continue working with Wandsworth to provide support to resolve non-conformity concerns regarding the strategic spatial approach to industrial land in order to support the delivery of Good Growth in the borough in line with the London Plan.

The following table details the matters raised by the Mayor of London in his representations to the Regulation 19 Wandsworth Local Plan, and the status of those representations.

The table seeks to provide clarification and clarity to the extent to which matters raised by the Mayor are resolved, or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between the Council and the Mayor. Issues marked with a \* are issues of general conformity.

Text proposed to be inserted in *italicised and underlined*

Text proposed to be removed in ~~strike through~~

Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
The policies map changes document now clearly designates the boundary of the Clapham Junction OA, and this is also shown in the Clapham Junction and Winstanley/York Road Regeneration Area Map 6.1. The indicative growth figures set out in Table 2.1 LP2021 have also been referenced in para 6.19 of the supporting text to the Clapham Junction and York Road/Winstanley Regeneration Area – and the comment that the indicative growth figures are expected to be exceeded due to the inclusion of the wider Winstanley/York Road area is noted.	1	652	Para 6.19	Comment noted	No change considered necessary		Resolved
<i>Employment (636)*</i> Previous comments set out the need for the plan to identify specific sites and	2	636	Building a Strong Economy	Comments noted. The identified need for industrial land is set out within paragraph 18.23, which includes reference	Amend paragraph 18.23 as follows:	GLA officers have had iterative discussions with Wandsworth officers regarding how the Local	Ongoing. Outstanding issues of conformity



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<p>areas to accommodate future industrial and waste uses and the Mayor is pleased to note that some of the site allocations set an expectation of a percentage increase in existing industrial floorspace (e.g. the Riverside Business Centre site allocation (WV1) which now identifies a need for at least a 50% increase in the existing amount of industrial floorspace, and the Frogmore Cluster, WT6, WT7 and WT3 which seeks an uplift of 25% existing industrial floorspace and office).</p> <p><b>However, the overall scale of losses and gains are not easy to follow</b>, and these should be set out clearly within the plan itself, rather than depending on referring to other evidence base documents such as the HELAA. This would assist future monitoring, which will be important to ensure that the delivery of industrial intensification in particular can be kept under review. It would provide greater clarity to developers if this was also expressed in floorspace equivalent figures, and to ensure that these uplifts are consistently expressed in terms of 'industrial' floorspace rather than just 'economic' use – where appropriate.</p> <p>The Mayor <b>welcomes the commitment to a net increase in industrial floorspace expressed in SDS1 (Part E 3)</b>, and he is pleased to see the clear acknowledgement in para 18.23 of the importance of retention and protection of the borough's existing remaining industrial land, as well as the need for intensified industrial floorspace where appropriate. <b>He also notes and welcomes the changes to Part B3</b> which no longer accepts increased operating</p>				<p>to both floorspace and land-equivalent figures. It is agreed that it would be helpful to also include reference to the borough's capacity to address this need within this paragraph, as informed by the borough's HELAA. This document forms part of the evidence base which justifies the strategy taken in the Local Plan and has been made available to PINS; it is not considered necessary to include substantial detail from the report within the body of the Local Plan for it to be sound. The development of industrial uses is monitored and published within the annual Authority Monitoring Reports, as set out in Policy LP61 Monitoring the Local Plan.</p> <p>References to 'industrial' and 'economic' floorspace within the Local Plan are specific and intended, including with respect to required uplifts in capacity. Both terms are clearly defined (see the supporting text – see paragraph 18.24 and the Glossary).</p> <p>The Council's response to the Mayor's concerns regarding the borough's ability to meet the identified need for industrial floorspace are set out in more detail against the Mayor of London's comment #637.</p>	<p>"...importance of retaining and protecting the borough's existing remaining industrial land within that capacity, and the need to provide intensified industrial floorspace in locations where this is appropriate, is therefore paramount. <u><i>This policy sets out the Council's strategy to address this identified need and is informed by the borough's HELAA (2022). This exercise identified that the supply of core industrial capacity over the Local Plan period to 2037/38 is 44,828 sqm. The development of industrial uses will be monitored over the Local Plan's duration within the borough's Authority Monitoring Reports.</i></u>"</p>	<p>Plan (WLP) policy can be made more robust to respond to the specific industrial space needs identified in LBW's Housing and Economic Land Availability Assessment (HELAA).</p> <p>The HELAA identifies core industrial capacity of 44,828sqm over the plan period, of which a floor space demand of 30,500sqm for B8 uses is identified. While LBW presented additional materials from the HELAA and the Battersea Design and Technology Quarter (BDTQ) Economic Appraisal and Design Framework to address concerns about industrial floor space uplift identified in site allocations, the WLP currently lacks a robust strategy for delivery and viability for B8 uses.</p> <p>The WLP also creates ambiguity by defining economic use and industrial use: Based on the glossary of the WLP, a major difference between economic use and industrial use is that economic use includes office uses in addition to other uses that are mentioned under industrial uses - research and development, light industry, general industrial, storage and logistics/distribution and appropriate <i>sui generis</i> uses. While the policy text emphasises protecting industrial uses and intensification, this major overlap in the definitions of economic and industrial use renders the policy undeliverable in terms of achieving the 44,828sqm of core industrial capacity identified in the HELAA, of which the majority is for B8 uses.</p> <p>The Mayor welcomes numerous areas identified to direct net increases in industrial floorspace –</p>	<p>unresolved at policies E4 and E7</p>

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<p>hours as an appropriate measure of intensification.</p> <p><b>However, he remains unpersuaded that the plan will deliver the required need for industrial floorspace</b>, given that it perversely appears to depend almost entirely upon the introduction of non-industrial uses within SIL which is contrary to the London Plan.</p> <p><b>Specifically, the draft Local Plan is not in general conformity with the following policies:</b></p> <ul style="list-style-type: none"> <li>• Policy E4A – which makes it a requirement that Local Plans should ensure there is a sufficient supply of land and premises to meet current and future demands for industrial and related functions;</li> <li>• Policy E7B – which is clear that the scope for co-locating industrial uses with residential and other non-industrial uses may be considered within Locally Significant Industrial Sites (LSIS), but not SIL.</li> </ul>						<p>(i) strategic industrial reservoirs SIL and LSIA (Locally Significant Industrial Areas), (ii) Economic Use Intensification Areas (EUIAs), (iii) Economic Use Protection Areas (EUPAs) and (iv) Focal Points. The Mayor is not convinced that this area strategy can viably deliver the industrial space identified as needed by the HELAA without further strengthening the policy and clearly demarcating areas and sites for industrial uses.</p> <p>LSIAs are equivalent of the Mayor’s Locally Significant Industrial Sites (LSISs) and allow for industrial uses as defined in LP34 part A, which does not include residential or office uses. However, an exception is made for the BDTQ for the upper floors to allow for offices and research and development uses (LP34 B4a). There is also an expectation set that development in BDTQ can be predominantly office use. The Mayor considers that rather than intensifying and reinforcing the SIL designation, the introduction of such uses is likely to weaken the integrity and the operational function of the SIL and further restrict opportunities to meet future industrial needs. In addition, the EUIAs and Focal Point allow for mixed use residential. Industrial uses, specifically heavy industrial and B8 uses – by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can conflict with other land uses, particularly residential development.</p> <p>The HELAA identifies a requirement of 4.7ha of land area to meet 30,500sqm demand for B8 floorspace until 2034. The policy</p>	

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						<p>and the supporting evidence do not provide any clarity on the deliverability and viability of this specific B8 demand. For example, LP35 A(2) EUiAs refers to intensification of economic floor space, with an expected uplift of 50% within the Bendon Valley EUiA and 25% in the Wandle Delta sub-area – this does not provide clarity as to whether this uplift is able to meet the identified need for specific industrial use, say B8. Moreover, industrial intensification is predominantly provided as light industrial uses, B1a/b and E (g)(iii) and (ii). The policy mentions that there is a potential for ground floor spaces to be used for B8, which does not provide a strong foundation for delivering the borough’s need. The majority of this intensification is located within the Riverside Business Centre EUiA (13, 613sqm) and BDTQ (22,297sqm) which, based on current planning applications, do not provide B8 uses.</p> <p>GLA officers have had continued dialogue with Wandsworth officers to discuss how the WLP policy can be made more robust to respond to the specific industrial space needs identified in the HELAA. The Mayor recognises (i) the borough’s vision for BDTQ, (ii) the type of developments coming forward in the BDTQ, and (iii) the small size of the sites, especially in the northern part of BDTQ, that may not be able to accommodate large logistics and storage functions. Based on this, and conversations with LBW officers, the Mayor proposes modifications that align with the borough’s vision of protecting and enhancing industrial uses, while constructively addressing the</p>	

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						<p>general conformity issue with the London Plan.</p> <p><u>Proposed Modifications:</u></p> <ol style="list-style-type: none"> <li>1. Redraw BDTQ boundaries to exclude the heavy industrial uses (see Figure 1 in the appendix), especially to safeguard the following uses (see Figure 2 in the appendix):               <ol style="list-style-type: none"> <li>a. Self store Ingate Place</li> <li>b. the Tarmac site (B2) in Silverthorne Road</li> <li>c. the Bidfoods site (B8) in Silverthorne Road</li> <li>d. the Abellio bus garage facility (SG) in Silverthorne Road</li> </ol> <p>The Mayor strongly supports the need to retain the <i>Queenstown Road Battersea SIL location</i> to facilitate sustainable servicing of the CAZ and retain capacity within proximity to the CAZ.</p> </li> <li>2. Re-designate SIL to LSIA in the redrawn BDTQ boundary (see Figure 1 in the appendix). The designation of Summerstown LSIA to SIL in the local plan may create a balance to the supply of SIL in the borough, while recognising that this LSIA only has some potential for industrial intensification.</li> <li>3. Strengthen policy wording in the text and site allocations that protects existing industrial land / uses, prioritises right kind of industrial uses (especially near CAZ) and re-provides affordable workspace to existing uses. Since Wandsworth is in the Central Services Area, paragraph 6.4.7 of London Plan Policy E4 must</li> </ol>	

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						<p>be reflected in the local plan policy, especially for the BDTQ.</p> <p>4. The Council has already adopted Article 4 directions in various locations in the borough that cover most of the SIL, LSIAs, EUIAs, EUPAs and FPAs where industrial intensification is directed. The Mayor asks the borough to provide clarity through policy on how the Article 4 directions will be implemented to genuinely provide for industrial uses, especially in areas where residential and office uses are allowed.</p> <p>5. Address the ambiguity in the definitions of economic use and industrial use and identify specific areas/sites and floor levels that allow for office and residential uses and where B8 uses are appropriate and can be accommodated.</p> <p>6. Commit to taking up the BDTQ master planning, focusing on introducing design codes that create opportunities for reasonably sized industrial units. This will address a growing need for micro-hubs and other B8 type of uses that can be accommodated on ground floor and a few upper floors.</p>	
The Mayor welcomes the focus on the need to manage traffic and provide good public transport connectivity, as well as support active travel and the support for the 15-minute neighbourhood. He welcomes the references to Healthy Streets, Vision	3	651	Sustainable Transport	Support noted.	No change considered necessary	Please reference TfL Statement of Common Ground for outstanding areas of disagreement.	Resolved

Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
Zero road safety objective and active travel. The Mayor's <u>Sustainable Transport, Walking and Cycling LPG</u> may support the borough further in its efforts to identify walking and cycling networks, and any gaps and potential improvements.							
<p>The London Plan 2021 sets Wandsworth a 10-year net housing delivery target of 19,500 units (1,950 per annum) up to 2029 as set out in Table 4.1. Of this target, 4,140 new homes should be identified from small sites (set out in Table 4.2 of the LP2021).</p> <p>The Local Plan sets a housing target of 20,311 homes over the plan period and includes a commitment to delivering 1,950 new homes per annum up until 2028/29 and to providing 414 new homes per annum from small sites across the entire plan period, taking a sequential approach to the location of new allocations. <b>This aligns with the London Plan targets.</b></p> <p>The draft plan maintains the borough's commitment to the preparation of an SPD which will identify sites and set out design codes for those sites/areas and <b>this is welcomed as it accords with the requirements of London Plan Policy H2.</b></p> <p>The Mayor has recently published for consultation draft London Plan guidance on design and characterisation consisting of characterisation and growth strategy guidance, small site design codes guidance, optimising site capacity guidance and housing design standards guidance.</p>	4	628	SDS1 Spatial Developm ent Strategy 2023 - 2038	Support noted	No change required.		Resolved
The Mayor welcomes the clarity of SDS1 Part G which sets out a clear commitment to meeting identified waste needs through protecting existing	5	635	SDS1 Spatial Developm ent	Support welcomed.	No action required in respect of SDS1		Resolved

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<p>waste sites, identifying suitable areas for new recycling and waste management facilities and supporting the Mayor's ambition of net zero waste by 2026 through the circular economy.</p> <p>This is further detailed in Policy LP13 (see below), although <b>the plan does not identify any specific additional sites or areas for waste, which the Mayor considers misses an opportunity</b>, and calls into question the deliverability of the plan approach, given the identified waste capacity gap.</p>			Strategy 2023 - 2038				
<p>The Mayor welcomes the borough's commitment to ensuring that new development supports the creation of a coherent and high-quality built environment as a key component of the Local Plan with a policy approach underpinned by a deep understanding of the values, character and sensitivity of different parts of the borough.</p> <p>The Mayor <b>questions the deletion of references</b> to ensuring that service access including for regular maintenance, waste collection, deliveries is separated from the primary access locations and screened away from key public areas, and he would point to London Plan 2021 Policy T7 Part G which seeks safe, clean, and efficient deliveries and servicing through the provision of space for services, deliveries and storage off-street.</p>	6	644	LP1 The Design-led Approach	<p>Support noted.</p> <p>References to ensuring that service access including for regular maintenance, waste collection, deliveries is separated from the primary access locations and screened away from key public areas, is now contained in LP2 - General Development Management Principles.</p>	No change required	<p>Noted that LP2 part G references "The operational and servicing requirements of sites should be provided for on-site and access for maintenance, collections and deliveries avoid movement conflicts both within and beyond the site.", which to some extent ensures that service access including for regular maintenance, waste collection, deliveries is separated from the primary access locations and screened away from key public areas. More specific language as was included previously and/or a reference to London Plan Policy T7 G in LP2 General Development Management Principles will provide further clarity.</p>	Ongoing
<p><b>The Mayor welcomes the borough taking a plan-led approach to future growth based on a clear understanding of local character</b> which is in line with the approach to good growth that underpins the LP2021.</p>	7	646	LP3 Historic Environment	<p>Support noted.</p> <p>The council is part of the WHS steering group and the suggested clarification has been proposed.</p>	<p>Amend paragraph 14.25 to read:</p> <p>"Wandsworth is a stakeholder borough (along with adjacent boroughs) in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World</p>	<p>Comment addressed through the proposed modification.</p>	Resolved

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<p><b>Draft Plan Policy LP3, and the new addition of part B is particularly welcomed.</b> This new provision responds to previous comments and sets out a policy approach for those applications which may affect the setting and approaches of the WWHS. It details how development proposals should demonstrate that they will conserve, promote, actively protect and interpret the OUV of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.</p> <p>As noted in supporting text at paragraph 14.25 LBW is a stakeholder borough along with other adjacent boroughs in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World Heritage Site and its setting, although it is not made explicit whether LBW is part of the WHS Steering Group that contributes to the management of the site – which could usefully be clarified.</p>					Heritage Site and its setting <i>as a member of the WHS Steering Group.</i> "		
<p><b>The Mayor welcomes the clear whole-borough definition of a tall building</b> proposed within Policy LP4 Tall and Mid-Rise Buildings. This is set at 7 storeys or 21m to the top of the building, which derives from the Urban Design Study (2021). This accords with LP2021 Policy D9. <b>He further welcomes the clear approach regarding the specific locations of such tall buildings,</b> being those set out in designated zones (clearly indicated on maps in an appendix to the plan) with a clear policy that tall buildings outside of these areas will not be acceptable – and that within these zones proposals need to meet the specified criteria.</p>	8	645	LP4 Tall and Mid-rise Buildings	Support noted.	No change required.		Resolved



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<p>The Mayor also notes the additional policy approach of defining ‘mid-rise’ buildings of 5 storeys (or 15 metres) which will provide welcome clarity.</p> <p>Appendix 2 sets out clear appropriate heights in metres and storeys – expressed as a range, using a heat-map style visualisation to express appropriate heights within a range. This is clear and is supported.</p> <p><b>The Mayor also commends LBW for its new policy provision at B6 of Policy LP4</b>, which responds to previous comments regarding provisions to preserve the Outstanding Universal Value (OUV) of the Westminster World Heritage Site (WWHS). This requires development proposals which affect the setting and approaches of the WWHS to address all parts of the criteria set within part B of Policy LP3 which creates a clearer framework for proposals to demonstrate that they preserve the Outstanding Universal Value of the Westminster World Heritage Site.</p>							
<p>The Mayor welcomes Wandsworth’s commitment in Policy LP13 A to meeting its waste apportionment targets which it sets out in Table 15.5 of the Local Plan. These are in line with the apportionment figures in Table 9.2 of LP2021 for 264,000 tonnes by 2021 and beyond.</p> <p>All existing waste sites are safeguarded for waste use (as stated in para 15.67) which is in line with Policies SI8 and SI9 of the London Plan. Also welcomed is the policy requirement in LP13 C that 95% of construction and demolition waste be reused, recycled or recovered for beneficial use and so too is the requirement for Circular Economy</p>	9	635	LP13 Circular Economy, Recycling and Waste Management	<p>Support welcomed.</p> <p>It is not true to say that the plan does not identify any specific additional sites or areas for waste. Policy LP13 F states “New waste capacity to close Wandsworth’s capacity gap is directed towards existing facilities, safeguarded wharves, and SIL and LSIA’s.”</p> <p>While there is currently a capacity gap for apportioned waste, the need is not “immediate”. The target of net self-sufficiency for waste management is not until 2026.</p> <p>Wandsworth is reliant on the market to deliver capacity to meet C&amp;I and C&amp;D waste management facilities. This means that Wandsworth cannot build the waste capacity itself, but is required, by the NPPW and London Plan, to create the</p>	<p>An additional sentence is proposed to paragraph 15.73 as follows:</p> <p>'...Where monitoring demonstrates that waste management capacity to meet the apportionment target <del>has not been achieved</del> <u>is unlikely to be achieved</u> by 2026, the Council will work with the GLA to proactively engage with operators to encourage delivery of additional waste management capacity in the borough, <u>and may seek help from other London Boroughs to meet the apportionment target.</u>'</p>	<p>The Mayor appreciates a detailed response by the borough. While the borough did not receive any waste site allocations, the Mayor acknowledges that LP13 F directs waste capacity to existing facilities, safeguarded wharves, SIL and LSIA's. The Mayor notes the reference to the SD 105 Waste Evidence Base Addendum. As per the addendum, the borough has identified the following opportunities that have the potential to come forward to close the 2.1 ha waste capacity gap identified as part of the Local Plan.</p>	Ongoing

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<p>Statements to accompany all referable planning applications, both of which are in line with Policy SI7 of the LP2021.</p> <p>Wandsworth's support in LP13 A for the Mayor's net self-sufficiency target is noted. However, <b>the Mayor remains concerned about the immediate identified capacity gap in meeting its waste apportionment target.</b> This amounts to up to 2.1ha land in 2021, depending on the type of facility. Para 15.73 should commit to closing the gap, rather than 'seeking to' close it, which better supports the commitment set out in policy.</p> <p>This paragraph also sets out where new facilities will be directed, but otherwise the paragraph states that beyond 2026 where waste management targets have not been met, LBW will monitor and 'work with the GLA to engage with operators to encourage additional waste management capacity'. As the Greater London Authority is not a waste planning authority, <b>the Mayor considers that it is for the borough to take a more proactive approach</b> to delivering additional capacity, in line with paragraph 9.8.6 and 9.8.7 of the London Plan, and to documenting effective cooperation and clearly setting out where it has gone as far as it is able to. While the Mayor notes the borough's Waste Export evidence base study which records and audits issues raised through the duty to cooperate engagement on waste exports between Jan-March 2021, LBW is encouraged to consider how it can go further. Wandsworth needs to proactively engage with neighbouring boroughs to provide greater reassurance that its</p>				<p>opportunities for the market to deliver new waste facilities. There is no guarantee that the market will deliver and therefore Wandsworth's cannot commit to close the gap, only seek to do so. The London Plan does not require Boroughs to deliver waste capacity themselves, but to "allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2." Policy LP13 does this by safeguarding existing waste sites and identifying areas suitable for new waste facilities.</p> <p>No waste sites came forward during the call for sites. This is not unusual as waste operators rarely put forward sites to be included in a Local Plan or Waste Plan. It should also be noted that allocating a site for waste uses does not mean that the site will be developed for a waste use. In previous years, a number of boroughs have allocated sites for waste uses, for example the West London and East London Boroughs in their respective waste plans. No site allocated for waste use in the West London Waste Plan or East London Waste Plan has come forward for waste uses since they were adopted.</p> <p>While new waste facilities will be required to demonstrate that the site capacity has been optimised (London Plan policy D3), Wandsworth does not have the powers to demand the intensification of existing waste sites where there is no plan to do so by the operator or if no planning application comes forward for an existing waste site.</p> <p>A detailed analysis of opportunities to meet the London Plan waste apportionment targets, including other Boroughs' ability to help, can be found in submission document SD-105 Waste Evidence Base Addendum Meeting London Plan Apportionment Targets (April 2022). This analysis concludes that:</p> <ul style="list-style-type: none"> <li>Wandsworth's approach to waste planning meets all the London Plan policy requirements. New waste capacity to close Wandsworth's capacity gap is</li> </ul>		<p>(1) a new East London Waste Plan that was to come forward after May 2022 election.</p> <p>(2) Surplus capacity in Bexley based on existing and pipeline facilities</p> <p>(3) Wandsworth seeking an update on the work that was undertaken to study the capacity for Powerday facility which can allow the pooling of apportionment targets of Western Riverside authorities</p> <p>(4) Following up on the Western Riverside Waste Technical Paper (2017) that identified sufficient waste management capacity.</p> <p>While the Mayor recognises that allocating additional sites in absence of site allocations coming forward is not under the borough's control, there are sufficient opportunities as stated in the Waste Evidence Base Addendum that the borough can commit to taking a proactive approach to ensure robust delivery of its Plan.</p> <p>Also, as mentioned in the Regulation 19 response, the GLA is not a waste planning authority, and the borough should take a more proactive approach firming its commitment to making the plan deliverable. Therefore, we propose the following modification to paragraph 15.73:</p> <p>Wandsworth <del>will seek</del> <u>commits</u> to <u>working toward closing</u> the capacity gap by identifying the most suitable locations for new</p>	

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<p>plan approach is deliverable. This could include:</p> <ul style="list-style-type: none"> <li>allocating more waste sites within the borough or outside, in line with Policy SI 8 B4 (a-c), which could include SIL/LSIS,</li> <li>considering intensification of existing safeguarded waste management sites which would require Wandsworth to demonstrate spare capacity or that it can accommodate additional capacity; and</li> <li>where apportionment targets are not going to be met in the borough, seeking to enter into joint waste plans, joint evidence and bi-lateral agreements to transfer the borough's apportionment and show how these can be met in the respective agreement/joint plan.</li> </ul> <p>The reference to meeting 100% of C&amp;D Waste including hazardous waste is welcome, and while it is noted that the borough will seek opportunities for the beneficial use of excavation waste within the borough, paragraph 15.71 notes that not all excavation waste is expected to be used within the borough.</p>				<p>directed towards existing facilities, safeguarded wharves, Strategic Industrial Land (SIL) and Locally Significant Industrial Areas (LSIAs).</p> <ul style="list-style-type: none"> <li>Following a review of sites, no individual sites suitable for allocation for waste uses in the Local Plan have been identified, other than existing waste sites. Sites outside Wandsworth cannot be allocated through its Local Plan.</li> <li>There is likely to be an upgrade to the existing Waste Authority facilities but the timescales and capacity increase are as yet unknown. There are no known plans to increase the throughput of any merchant facilities, which are all operating at optimal capacity, and there are no current plans to bring the non-operational site back into waste use.</li> <li>There is no opportunity to work collectively with the Western Riverside authorities to pool apportionment targets and plan for waste collectively because OPDC do not agree to do so.</li> <li>No other London Boroughs are currently in a position where they have surplus capacity and are at a stage in their Plan-making process to offer surplus capacity to Wandsworth. This position may change after Bexley's Local Plan examination and as the East London Boroughs begin the process of reviewing the East London Waste Plan.</li> </ul> <p><b>Wandsworth's approach to excavation waste is in line with the London Plan which states at 9.8.1 "The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste. The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream".</b></p>		<p>waste facilities. ... Where monitoring demonstrates that waste management capacity to meet the apportionment target <del>has not been</del> <i>is unlikely to be</i> achieved by 2026, the Council will <del>work with the GLA to</del> proactively engage with operators <i>and other authorities</i> to encourage delivery of additional waste management capacity in the borough.</p>	
<p>The Mayor notes the additional references to updated dates of the borough's Air Quality Action Plan (AQAP) in the supporting text, and that</p>	10	649	LP14 Air Quality, Pollution and	Support noted.	No change required.		Resolved

Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
<p>the AQAP sets out the Air Quality Focus Areas.</p> <p>LBW may find recently published consultation drafts of London Planning Guidance on Air Quality Neutral and Air Quality Positive could support the borough in its promotion of air quality neutral development.</p>			Managing Impacts of Development				
<p>The draft plan sets out, in LP23 A, Wandsworth's commitment to meet the Mayor's 50% strategic target for affordable housing <b>which the Mayor welcomes</b>, as he does the references in LP23 B to Policy H5 and the confirmation that developments of 10+ units (gross) must provide on-site affordable housing in line with the threshold approach.</p> <p>He also notes the revision to the supporting text para 17.16 that this is measured in habitable rooms in line with Policy H5.</p> <p>LP23 Part C sets a tenure split of 50:50 (social/affordable rent: intermediate) with 25% for First Homes. Whilst para 17.12 acknowledges the London Plan's requirement for provision to be focused on genuinely affordable tenures and commits to prioritising these tenures, the Plan also proposes a broader spectrum of affordable housing provision including other intermediate products such as Shared Equity, Discounted Market Sale and Intermediate Rent. While the London Plan does not prevent a focus on these other tenures, <b>the Mayor would not support an approach which made Discount Market Sale a preferred tenure.</b></p> <p>Although a 50:50 split is within the limits of Policy H6 LP2021, the Mayor</p>	11	629	LP23 Affordable Housing	<p>Comment noted.</p> <p>The London Plan has a presumption in favour of social rent and intermediate housing, but acknowledges the wider range of products that could contribute to genuine housing need. This includes DMS.</p> <p>Government policy towards affordable housing was amended by a WMS after the adoption of the London Plan. Whilst the GLA have issued guidance to suggest that First Homes aren't preferable or workable in London, the London Plan allows boroughs to identify other forms of affordable housing to meet needs where they are viable or where they would deliver a more mixed and inclusive community (para 4.6.2).</p> <p>Evidence the Council has suggests that First Homes may be viable under certain conditions and in certain areas in the borough, and that the inclusion of First Homes in the housing tenure mix is not necessarily detrimental to overall viability. However, the requirement for First Homes is set out in the National Planning Practice Guidance, and this does not need to be repeated within the Local Plan policy. Changes are made to the supporting text to Policy LP23 to explain this.</p> <p>It is acknowledged that varying conditions across the borough may mean that First Homes cannot be delivered on all sites. Flexibility can be introduced in to the wording to seek a balance of intermediate products after the agreement of the low cost rented element. Given the identified need for low-cost rent, which is highlighted in the London Plan and sought through the discretionary 40% element set out in London Plan Policy H6 (A.3), it is</p>	<p>Amend wording in criteria (C) to read, 'The Council will require an affordable housing tenure split of <i>at least</i> 50% low-cost rent products, <del>25% First Homes and 25%</del> <i>with a balance of</i> other intermediate products. <del>A minimum discount of 30% will be applied to First Homes.</del>'</p> <p>Amend the first sentence of para 17.11 to read, 'A tenure split of <i>at least</i> 50% low-cost rented, <del>25% First Homes and 25%</del> <i>with a balance of</i> other intermediate products will be required.'</p> <p>Amend para 17.13 to read, '<del>In accordance with the</del> <i>The</i> updated Planning Practice Guidance, <i>requires</i> 25% of all homes <del>required delivered</del> through developer contributions as part of planning obligations agreed under Section 106 agreements <del>should to</del> be delivered as First Homes. <del>Policy LP23 will require the delivery of First Homes which are</del> should be discounted by at least 30% against the market value, <i>acknowledging the variance of market conditions across the borough</i>. The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'</p>	<p>While the Mayor welcomes this inclusion of 'at least' 50%, it is not a significant shift from what was previously set out.</p> <p>Considering the borough's local need of genuinely affordable housing (current – 56.9% (Table 11), 51% for newly forming households (Table 12) (SD-043 - LBW Local Housing Needs Assessment)), we suggest that the borough should push for a higher target for the tenure split from 50:50 to 70:30 or 60:40 (social/affordable rent: intermediate) to better align with the local affordable housing needs of the borough.</p> <p>The Mayor welcomes the deletion of 25% First Homes from the policy text. National policy on First Homes sets a policy expectation and is not a legislative requirement. GLA's FH Practice Note makes this clear, and under s38(6) PCPA the starting point for decision making is the Development Plan, including the London Plan. The local plan policy should de-emphasise the prioritisation of First Homes and include that FH should not impact deliverability of other affordable tenures in light of local circumstances, housing need, and market values. The Mayor also recommends including</p>	Proposed Modifications agreed.

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<p>considers that given the extent of need – including as detailed in the Council’s Local Housing Needs Assessment (2020) – <b>the inclusion of 25% First Homes requirement with a variable discount</b> (depending on viability) before exploring greater proportions of low-cost and intermediate rents to provide for a range of incomes, <b>is a concern</b>. Moreover, the London Plan is clear that intermediate ownership products should be affordable to households with incomes up to £90,000. <b>It is considered unlikely that First Homes</b> – even with a deep discount to market value – <b>can deliver genuinely affordable homes</b> to a range of household incomes up to this cap. Therefore more information is needed surrounding First Homes deliverability and affordability in Wandsworth in the context of strategic and local need. Does the borough, for example:</p> <ul style="list-style-type: none"> <li>• have evidence which demonstrates that First Homes are attainable to households in Wandsworth that are considered to be in need of intermediate homes, or that they would be more affordable than other intermediate products (without making Social Rent or London Affordable Rent unviable)?</li> <li>• have the resources available to administer First Homes (i.e. the discount to market value, affordability requirements, household eligibility criteria etc) for each subsequent sale in perpetuity at the scale envisaged in the policy?</li> </ul> <p>Overall, the Mayor would like to be assured that the issues for consideration set out in the GLA’s First</p>				<p>considered prudent to introduce 'at least' 50% low cost rent into the policy to emphasise this figure.</p>		<p>affordability/household incomes to contextualise this in the policy.</p> <p>The London Plan is clear that intermediate ownership products should be affordable to households with incomes up to £90,000. It is considered unlikely that First Homes – even with a deep discount to market value – can deliver genuinely affordable homes to a range of household incomes up to this cap. Based on conversations with the Wandsworth officers, there is no demand or supply of First Homes that has come forth in the borough since the evidence was produced in December 2021. This further necessitates a de-prioritisation of the first homes policy in the local plan.</p> <p>While there is a need to reconsider the affordable tenure targets and how they are achieved, the Mayor suggests further edits (deletions – bold, strikethrough; additions: bold, italicised, underlined) to the LBW’s proposed modifications:</p> <p>Amend para 17.13 to read, '<del>in accordance with the</del><u>The</u> updated Planning Practice Guidance, <b><u>sets a policy expectation that requires</u></b> 25% of all homes <del>required</del> <b><u>delivered</u></b> through developer contributions as part of planning obligations agreed under Section 106 agreements <del>should to</del> be delivered as First Homes. <del>Policy LP23 will require the delivery of</del> <b><u>Where</u></b> First Homes <b><u>are delivered</u></b>, <del>these which are</del> should be discounted by at least 30% against the market value, <u>acknowledging the variance of market conditions, and the importance of not impacting on deliverability of</u></p>	

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Homes Practice Note (July 2021) have been fully explored.						<b><i>other affordable rent tenures across the borough.</i></b> The Council will apply local eligibility criteria (such as income caps) as part of section 106 agreements, which might in some cases necessitate a greater level of discount.'	
<p>The Mayor welcomes the requirements to meet the housing standards set out in Policy D6 LP2021, the accessible housing requirements in Policy D7 LP2021, and to being in accordance with Policy D5 LP2021 and achieving the highest standards of fire safety in line with Policy D12 LP2021. He also <b>notes and supports the downward revision</b> to the policy limiting conversions to those dwellings larger than 130sqm (as opposed to 150sqm previously).</p> <p>The Mayor <b>notes and accepts</b> that it is LBW's intention to retain a policy for family sized conversions (over 130sqm) to be provided with direct access to a dedicated garden of at least 15sqm and notes the justification that the borough consider 15sqm more usable and that this will generally apply to ground floor units which can be provided with direct access.</p>	12	630	LP27 Housing Standards	Support noted.	No change required		Resolved
<p><i>LP28, Purpose built student accommodation</i></p> <p>The Mayor welcomes the clarity provided in Policy LP28 A that the Mayor's Threshold Approach applies to purpose built student accommodation, to support the delivery of affordable accommodation.</p>	13	631	LP28 Purpose Built Student Accommodation	Support noted.	No change required		Resolved
<p><i>LP32, Traveller Accommodation (634)</i></p> <p>Policy LP32 safeguards the existing Gypsy and Traveller site at Trewint Street to meet identified needs over the Plan period and commits to identifying new sites should any additional need</p>	14	634	LP32 Traveller Accommodation	Support noted.	No change required		Resolved

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<p>arise over the plan period. The supporting text indicates at paragraph 17.63 that there is currently no identified need for additional pitches on this site or elsewhere within the borough based on its Gypsy and Traveller Accommodation Needs Assessment (2019).</p> <p>It should be noted that the Mayor is commissioning and overseeing a London-wide Gypsy and Traveller accommodation needs assessment. We expect findings to be available in early 2023 and will share these with boroughs.</p> <p>Meanwhile, boroughs should plan to meet need as identified in any needs assessment they have conducted since 2008, or, in the absence of a local assessment conducted since 2008, the need identified in Table 4.4 of the Plan.</p> <p>The Mayor will support boroughs in finding ways to provide Gypsy and Traveller accommodation. Funding is available for boroughs and other registered housing providers through his Affordable Homes Programmes for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches where an audit of existing pitches (refer to LP2021 Policy H14 paragraph 4.14.5) identifies that refurbishment is needed.</p>							
<p>Draft Policy LP33 sets out the borough's approach to the provision of new office space – promoting offices within the CAZ (i.e. the emerging Centres at Battersea Power Station and Vauxhall), and in Town and Local Centres, then in appropriate edge of centre sites allocated for offices, and lastly in Economic Use Protection Areas. This is in line with LP2021 Policy E1, the</p>	15	639	LP33 Promoting and Protecting Offices	<p>Support noted.</p> <p>Policies supporting the provision of walking, cycling and transport connectivity and capacity are set out elsewhere within the Local Plan, including LP49 (Sustainable Transport), LP50 (Transport and Development), LP52 (Public Transport and Infrastructure), and in the Area Strategies - which cover all of the borough's main centres.</p>	No changes considered necessary.		Resolved

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<p>rationale is clearly explained through supporting text. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. <b>The Mayor welcomes the explicit confirmation that this is in line with the Town Centre First approach</b> and notes the additional reference to the London Plan's Town Centre Network in supporting text</p>							
<p>Paragraph 18.12 reflects the requirement figure for offices derived from LBW's ELPS 2020 of 22,500sqm, and this is described as being the figure for the whole borough – although elsewhere including at paragraph 18.3 and in the Consultation Statement this figure is described as the need specifically for the local/sub-regional market (i.e. excluding the Vauxhall Nine Elms Battersea Opportunity Area, on the basis that most office development in this location will serve a different market). <b>It is not clear how this relates to the London Office Policy Review 2017</b> composite projection for 117,600m2 of office space up to 2041. This should be clarified within the supporting text so that it is explicitly clear what the spatial growth aspirations for office development are for the borough over the course of the Plan period.</p>	16	641	Para 18.12	<p>Comment noted.</p> <p>Wandsworth's Employment Land and Premises Study (ELPS, 2020) considered the two office markets that operate within Wandsworth separately: one relating to the Central London office market focused around the VNEB OA, and one concerning the local / sub-regional office market which is dispersed across the borough. Paragraph 18.12 describes the approach taken within the study to the identification of office floorspace need over the Local Plan period outside of the VNEB Opportunity Area. It is recognised that this is superfluous information for the Local Plan and is causing confusion. To remove such ambiguity, this paragraph should be amended such that the 22,500 sqm figure refers directly to the local / sub-regional market. The approach to the delivery of floorspace within the VNEB OA is addressed in paragraphs 18.8 and 18.9, which sets out that approximately 205,000 sqm of office floorspace is expected to have been completed by 2024 in this area and that the level of supply proposed is likely to provide for the future demand arising in the Central London office market. The composite projection for 117,600 sqm set out within the London Office Policy Review 2017 relates to Wandsworth borough as a whole and reference to it was included as part of the policy literature reviewing informing the ELPS 2020. Due to the different and more spatially specific approach taken within the latter, it is considered that reference to the London Office Policy Review</p>	<p>Amend paragraph 18.12 to read:</p> <p>"The borough's ELPS indicates that there will be a net additional requirement for 22,500 sqm of office floorspace up to 2034 <i>in the local/sub-regional market</i>, once vacant floorspace and transitional vacancies have been factored in. <del>While this figure represents the identified need for the borough as a whole, evidence of demand in the property market based on very low (2.8%) vacancy rates and positive net absorption rates for smaller units indicate that a considerable proportion of this demand is likely to be for office premises in the local/sub-regional market.</del> Consequently, the Local Plan has adopted an approach which focuses opportunities for increasing supply in this employment market in areas of the borough that are outside of the VNEB OA."</p>	Proposed edits provide adequate clarification.	Resolved



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				2017 demand figure is not necessary and could potentially be confusing.			
<p>Policy LP34 sets out clearly that the council will support applications for specified industrial uses in the borough's SILs and Locally Significant Industrial Areas (LSIAs –equivalent of the Mayor's Locally Significant Industrial Sites (LSISs)). However, the Mayor would stress that the strategic importance of SIL derives from the types of uses which it can accommodate – i.e. those uses which can be difficult to accommodate elsewhere. See paragraph 6.5.1 of the LP2021:</p> <p><i>“London’s SILs, listed in Table 6.2 and illustrated in Figure 6.1, are the capital’s main reservoir of land for industrial, logistics and related uses. SILs are given strategic protection because they are critical to the effective functioning of London’s economy. They can accommodate activities which – by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.”</i></p> <p>The Queenstown Road Battersea SIL area is in close proximity to central London, where there is little SIL-type industrial land. For this reason, the Mayor strongly supports the need to retain SIL <i>in this location</i> to facilitate sustainable servicing of the CAZ. LBW also have demand for additional industrial floorspace, in particular B8 uses, which needs to be met (Paragraph 8.11 of the borough's ELPS 2020 sets out the increasing demand for B8 uses within the borough with paragraph 8.13</p>	17	637	LP34 Managing Land for Industry and Distribution	<p>The Council recognises that the Mayor has outstanding concerns with regards to whether the plan will deliver the required need for industrial floorspace, and the associated issues of non-conformity raised with London Plan Policies E4.A and E7.B. The Council is keen to continue working with the Mayor and his officers to take the necessary steps, including making any appropriate amendments, to reassure him that the strategy put forward in the Local Plan strategy is based on a long-term and place-specific vision, is justified by the evidence base, and that it will be effective in practice.</p> <p>It is noted in the Mayor's representation (set out under comment #636) that the overall scale of losses and gains are not easy to follow. For clarity, Wandsworth's Housing and Economy Land Availability Assessment (2022) has identified that there is industrial floorspace capacity over the period to 2037/38 of 44,828 sqm, which is of a sufficient quantum to meet the identified need for core industrial uses of 35,7000 sqm. As the Mayor identifies, a significant proportion of this capacity (22,297 sqm) is allocated to the Battersea Design and Technology Quarter (BDTQ), the strategic redevelopment of which – through the intensification of industrial uses alongside the provision of new SME office floorspace – the Local Plan promotes. It is noted that the BDTQ forms one of the borough's key economic strategies, and alongside the intensification of industrial capacity, the initiative also seeks to capitalise on investment and deliver myriad benefits to the borough through the creation of a specialised economic cluster. The BDTQ concept was endorsed by Council at an Overview and Scrutiny Committee in February 2020.</p> <p>As was noted in the Council's previous response (to the Mayor's representations on the Pre-Publication Local Plan), whilst the designation of the 'Battersea Design and Technology Quarter' (including as a moniker) is new to this Local Plan, it builds on a long-standing approach. Much of the same area is designated within the Council's adopted Local Plan</p>	No changes suggested as a result of this representation, however officers at Wandsworth are committed to working with those of the Mayor to resolve the latter's outstanding concerns with the approach set out in the Local Plan.	See response to comment 636	Ongoing.  Outstanding issues relating to the co-location of offices within the Queenstown Road Battersea SIL and the designation of the SIL in BDTQ at Policy LP34.

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<p>contrasting this starkly with the projected loss in supply. It is notable that this draft of the plan has removed previous references to the projected loss of industrial floorspace, and the anticipated impact this will have on meeting demand). The HELAA makes clear that the majority of this floorspace need can realistically only be met within this SIL. <b>The Mayor continues to have concerns therefore about the overall strategy for large-scale co-location of other uses including offices in this SIL,</b> and specific policy wording including LP34 Part B4 – which is central to LBW’s vision and strategy for its Battersea Design and Technology Quarter (BDTQ). There is also insufficient evidence, if the potential intensification sites are viable/deliverable to accommodate the different types of industrial uses that need to be accommodated in a SIL.</p> <p>There is no space within the borough for additional industrial land, and much of the Council’s strategy for industrial intensification appears to be based on the introduction of other uses in SIL. Policy LP34 Part B4 seeks to allow SME office accommodation and research and development uses on upper floors in the BDTQ. <b>The Mayor considers that rather than intensifying and reinforcing the SIL designation, the introduction of such uses is incompatible with industrial uses</b> and likely to weaken the operational function of the SIL and further restrict opportunities to meet future industrial needs. While there is a proviso in part B4 that, “the use does not erode the effective operation of the industrial function of the SIL or LSIA” <b>this is not sufficient</b> to protect from the impact that such co-location would inevitably have on functioning of B8 and</p>				<p>as an ‘Industrial Business Park’ (IBP), of which Policy EI2 (Locations for New Employment Floorspace) Part 5 states it has “capacity to provide intensified economic uses including industrial floorspace as well as workspace for SMEs ... B1a (office) and B1b (research and development) uses may also be appropriate”.</p> <p>This approach reflects, among other things, the type of uses which currently occupy the area designated as an Industrial Business Park, including a number of sites which provide for office uses only (such as 220 Queenstown Road in Ingate Place) or for uses that accommodate SME enterprises (such as Battersea Studios in Silverthorne Terrace). The BDTQ concept, therefore, seeks to build on what is already happening within the area, rather than to substantially transform it.</p> <p>In his representation, the Mayor raised concerns that there was insufficient evidence that the potential intensification of sites is viable and deliverable, or that the borough can accommodate the different type of industrial uses that need to be accommodated in a SIL. It is noted that the BDTQ concept has been informed by significant consultation and engagement with landowners, local businesses and organisations, property managers, long-term leaseholders and other stakeholders in the area, and therefore is built on collaborative and realistic ambitions. This engagement is recorded within and has informed the BDTQ Economic Appraisal and Design Framework (EADF), an important piece of evidence which underpins the concept. As a result of such engagement, and in response to the ongoing development of the Battersea Power Station area (including the presence of Apple), the Council have been in discussions with landowners and have seen a number of schemes being brought forward in line with both the BDTQ vision and the Council’s adopted planning policy. These include two formally submitted proposals at:</p> <ul style="list-style-type: none"> <li>• 16 and 38-48 Havelock Terrace (2021/3201 and 2021/3202), which were both approved. These schemes make provision</li> </ul>			

Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
<p>heavier uses within the SIL. Upper floors need to have uses that are in line with London Plan Policy E4A, with implementation of the agent of change principle also being key – so that they do not undermine the types of SIL uses which cause noise, dust, odours, emissions etc.</p> <p>While noting LBW’s stated intention to retain the BDTQ as SIL, and its view set out in its consultation statement that, “the BDTQ concept should reinforce the area’s SIL designation, and that any development within this location should protect and enhance the industrial character of the area rather than de-designate it”, the London Plan provides for the introduction of non-industrial uses such as offices within SIL through a plan-led or masterplanning intensification, consolidation and release approach, which would result in the de-designation of relevant parts of SIL to accommodate non-industrial uses together with provision of sufficient capacity for SIL type industrial uses. Even if the borough were to follow this route it would still need to demonstrate sufficient capacity for the sort of ‘heavy’ industrial types of use that are appropriate to SIL in this location – rather than offices that could locate anywhere). This should take into account the Mayor’s practice note on industrial intensification and co-location through plan-led and masterplan approaches. This would mean the borough needing to re-provide genuine SIL-type industrial land elsewhere, and – if there is no scope for additional industrial land within the borough – all additional requirements would need to be met via genuine</p>				<p>to replace the 410 sqm yard at 38 Havelock Terrace and the 368 sqm of industrial floorspace at 48 Havelock Terrace (a total of 778 sqm) with 1404 sqm (GIA) of light industrial floorspace to be provided at ground and first floor level.</p> <ul style="list-style-type: none"> <li>• Battersea Studios (2021/0641) for the development of a new building on the site. This outlined ambitions to develop a net increase of 512 sqm of light industrial floorspace alongside flexible offices uses (noting the latter typology already forms the prevalent use in the existing two buildings on site). This scheme was ultimately withdrawn, however it is understood that aspirations for development remain.</li> </ul> <p>The Mayor’s officers were consulted upon and were supportive of these schemes and on the basis of site-specific considerations. In the Stage 1 letter on 16 and 38 Havelock Terrace, GLA officers noted that “Whilst large-scale office use is not normally appropriate in SIL, the proposals comply with the Local Plan policies for this part of the Queenstown Road SIL which is subject to an Industrial Business Park designation ... The proposed scheme would provide a significant increase in existing industrial floorspace, alongside office workspace suitable for small and medium sized companies within the Council’s emerging Battersea Design and Tech Quarter. Therefore, the intensification of light industrial use as part of an office-led mixed use scheme is supported”. With respect to Battersea Studios, officers noted that “The proposed employment uses are supported on this underutilised site within the Queenstown Road SIL and Vauxhall Nine Elms Battersea OA” and that “potential conflicts between uses within the SIL have been appropriately resolved in line with the agent of change principle”, including in relation to the site’s proximity to “a bus depot to the east, a Network Rail depot to the south, a food distribution centre to the west, and a cement works to the north”. The approach seeks to promote the provision of additional industrial floorspace that might not otherwise come forward within this part of the SIL (hence the inclusion of reference within the supporting text, in paragraph</p>			

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<p>intensification or substitution (in line with LP2021 E7). Within the BDTQ SIL, the proposed scale and spread of re-development for non- industrial uses including office use are of particular concern.</p> <p><b>GLA officers are happy to work with LBW on this, and the work on the BDTQ vision refresh</b> with consultants PRD provides an opportunity to seek greater clarity over how any industrial losses will be offset and additional needs met (particularly for heavier industrial uses and distribution) and to demonstrate how this can be viable and deliverable.</p> <p>Overall, LBW need to demonstrate convincingly that there is a robust spatial strategy for industrial land that sets out where/how losses – of B8 and other heavier type uses in particular – can be offset, in addition to meeting the additional demand.</p>				<p>18.34, to ‘reinforcing’ the area’s SIL designation). This is considered to be a more proactive approach to the delivery of industrial land than the ‘status quo’ (or the protection of industrial uses only), and is aligned with the ambitions of London Plan paragraph 6.5.3, which states that “innovations to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews”, as well as the requirements of the NPPF, paragraph 82, that planning policies should “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth” and to “set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”.</p> <p>It is recognised that the Mayor’s concerns also relate to the function served by SILs, and in particular that their strategic importance is derived from the type of uses which they can accommodate (as per paragraph 6.5.1 of the London Plan: “activities which – by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements – can raise tensions with other land uses, particularly residential development). It is recognised that a number of such uses are located within the proposed BDTQ, including the Tarmac site and the Abellio bus garage, which are located in the Silverthorne Road area to the south of the designation. The presence of these uses has been accounted for within the BDTQ concept, and the EADF document is founded on a strategy of gradual transition from heavy to light industrial uses from the southern part of the designation to the north, reflecting the existing uses and the investment in the Battersea Power Station development (see page 46). It is not the intention of the Local Plan to relocate existing heavy industrial uses, and it is relevant that such landowners were invited to participate in the development of the BDTQ concept (and associated EADF). In their representation on the Publication version of the Local Plan, Tarmac Trading Ltd stated that they “would like to express their support for the aspirational growth and development of the Borough as set out within the Local Plan Publication Version, including the development of</p>			

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				<p>the Battersea Design and Technology Quarter in which the Concrete Plant is located” (see comment #77). The representation expressed “support the wording of Policy LP34, as long as the objectives of the BDTQ do not lessen the need to ensure the safeguarding of existing industrial uses”, stating that “as a land use proposed to fall within the new BDTQ, the operation of the Concrete Plan should be safeguarded as the site previously was when designated within an ‘Industrial Business Park’. This would provide confidence to existing industrial occupiers that new development and the diversification of industrial areas will not unduly impact upon their abilities to run successful businesses”. It is not the Council’s intention that any development proposal should impact on the operation of the industrial function of businesses within the SIL, with wording to this effect included in LP34.B.4. It is recognised that the Mayor has concerns that the inclusion of this wording alone is not sufficient, noting the importance of the Agent of Change principle as a useful tool in this regard. Adherence to this principle, as well as other mitigations achieved through appropriate design, is required for any mixed-use development incorporating economic uses, as per LP37.C.</p> <p>In his representation, the Mayor notes that any potential losses of industrial land must be offset, and that additional needs – in particular for heavier industrial uses and distribution – must be met. This has been accounted for in the drafting of the Local Plan, and it is noted that the borough’s Employment Land and Premises Study anticipates a decline in heavy industrial (B2) uses within the borough over the period to 2034. The forecasting exercise sets out that there will be an excess capacity of B2 floorspace of 1,800 sqm (or a land-equivalent of 0.3ha) by 2029 and 4,900 sqm (or a land-equivalent of 0.7ha) by 2034. The protection for such uses and sites set out within Policy LP34 should therefore be capable of meeting needs with respect to heavy industrial uses. It is recognised that logistics uses form considerable part of the borough’s industrial demand, and the Council seeks to retain these – where they exist – within the BDTQ. It is noted that the certain distribution uses currently operating within the BDTQ, such as Gorillas and Deliveroo, are considered to be</p>			

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				<p>compatible with offices uses. That notwithstanding, the Local Plan also takes a protective approach to the borough's Locally Significant Industrial Areas (LSIAs, the equivalent of the London Plan's LSIS). Although it is in principle permissible under the London Plan, the Local Plan does not allow for the co-location of industrial and non-industrial uses in the LSIAs. This is intended to protect such locations and to allow them to accommodate industrial uses above and beyond that which can be accommodated within the SIL, including logistics and distribution uses.</p> <p>It is recognised that the London Plan provides for the introduction of non-industrial uses, such as offices, within SIL through a plan-led or masterplanning intensification, consolidation and release approach – as set out within Policy E7 and the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches. It is noted that such an approach, as per paragraph 6.7.2, is focused on the "release of some land for a mix of uses", whereas this is not the intention of the BDTQ initiative, which seeks to retain (and intensify) industrial uses on all sites. In this location, the approach is considered to be more akin to the co-location of industrial and non-industrial uses as promoted by the London Plan within the LSIS (as per Part B), supported by the requirements of LP37.C, which address issues over conflict between different uses.</p> <p>Wandsworth is willing to work with officers of the GLA to consider whether redrawing the boundaries of the BDTQ (for example, to exclude the more traditionally 'SIL' heavy industrial uses, such as the Tarmac Trading Ltd site and the Abellio Bus Garage) would help to allay the Mayor's concerns. Alternatively, officers are also happy to consider whether it would be appropriate to re-designate parts of the BDTQ as LSIA to ensure compliance with the London Plan. The Council would need to be reassured that any such change would not diminish the importance attached to the ongoing industrial function of this area, recognising that there has been development interest in promoting other non-industrial uses within this location also. It is noted that, while Wandsworth takes a</p>			

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				<p>protective approach to its LSIA/LSIS industrial land elsewhere in the borough, the Local Plan nonetheless also proposes that the Summerstown LSIA is redesignated as SIL. This reflects the types of uses that occur within this location (including some 'traditional' SIL uses, such as the accommodation of waste), and supports the ambitions of paragraph 6.5.2 of the London Plan, which states that "To ensure that London can retain an efficient logistics function it is particularly important to secure and enhance strategic provision in SILs in ... the Wandle Valley in south London. This should be complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London".</p> <p>Please note, the representation made reference to the removal of a sentence on the projected loss of industrial floorspace which was included in the Pre-Publication version of the Local Plan. This was removed as this figure was based on work done as part of the Employment Land and Premises Study; this work has now been updated as part of the HELAA and so was out of date. The latter document sets out the projected gains and losses as a result of known planning applications</p>			
<p><b>Economic Use Intensification Areas (EUIAs), Economic Use Protection Areas (EUPAs) and Focal Points of Activity</b></p> <p>Wandsworth have a range of different employment designations. The LBW employment designations must not conflict with or undermine the London Plans industrial designations and it would be helpful to make very clear the distinction between these designations and the London Plan SIL/LSIS designations. In light of comments above regarding the importance of demonstrating a spatial strategy to accommodate industrial needs, and noting the policy provisions within LP35 Mixed Use Development on Economic</p>	18	638	LP35 Mixed-Use Development on Economic Land	<p>Comments noted. The various economic land designations which are subject to policy requirements in LP35 (Economic Use Protection Areas; Economic Use Intensification Areas; Focal Points of Activity) are not considered to conflict with or to undermine the London Plan's industrial designations. In accordance with London Plan Policy E4.B, existing industrial uses in these locations (and elsewhere within the borough) meet the London Plan definition as 'Non-Designated Industrial Sites'. The approach to existing industrial land within these designations – within which the intensification of industrial provision is promoted the protection and full replacement is required, or the demonstration that there is no reasonable prospect of the site being use for industrial and related purposes (see LP34 parts C and D and LP35) – is considered to be consistent with London Plan Policy E7.C and E7.D (see also LP37), and it is noted that the policy requirements</p>	No changes considered necessary.	See GLA response to comment 636, specifically related to demand for B8 uses and how the local plan policy can ensure that the borough's need for B8 industrial uses over the plan period is delivered.	Resolved

Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
<p>Land, and supporting text at para 18.42 regarding the overall provision of employment land, it is also considered important to continue to explore the potential for EUIAs, EUPAs and non-designated industrial sites as well as Focal Points of Activity to accommodate potential industrial intensification. As previously commented the introduction of non-industrial uses within industrial land outside of the strategic reservoir should follow the criteria set out in Policy E7C of the LP2021, where this is appropriate, and where this proposes co-location, should also follow criteria in LP2021 Policy E7 D. LBWs amendments to LP37 regarding definitions of affordable workspace to better align with Policy E3 of the LP are welcome. The distinction drawn with open workspace is also noted.</p>				<p>of the London Plan would also apply to redevelopment proposals in Wandsworth as they form part of the borough's Development Plan. The capacity for intensification in these locations is considered within the borough's Housing and Employment Land Availability Assessment (HELAA).</p> <p>None of the designations identified above overlap with the Strategic Industrial Locations (SIL) or the Locally Significant Industrial Sites (LSIS) / Areas (LSIAs), as clearly depicted on Wandsworth's Policies Map. Their relationship to the SIL and LSIS is set out in paragraph 18.40, while the relationship between LSIS and LSIAs is clarified in paragraph 18.27.</p>			
<p><b>The Mayor welcomes Wandsworth's promotion of wharf sites</b> to support the function of moving freight by river and recognition of the Safeguarded Wharves Review 2018-2019 which was granted approval by the Secretary of State in September 2020 and recommends the ongoing safeguarding of all five of Wandsworth's wharves including Smugglers Way, Pier, Kirtling, Cringle Dock and Middle Wharves.</p> <p>The Mayor's Transport Strategy also seeks to increase the proportion of freight moved on London's waterways and retaining safeguarded wharves is a key enabler of this.</p> <p><b>The Mayor welcomes the commitment to the safeguarding of the borough's five wharves</b> in the draft Plan Policy LP40. This is in line with the LP2021 Policy SI 15 which requires (amongst</p>	19	642	LP40 Safeguarding Wharves	<p>Support for Policy LP40, and modifications made in response to the Mayor's previous representation, are noted. It is agreed that changes should be made to paragraph 18.84 to avoid the unintentional implication that it is only recommended that planning applications affecting safeguarded wharves are referred to the Mayor.</p> <p>The site allocations concerning safeguarded wharves are to be read in conjunction with Policy LP40, and therefore parts A (concerning the loss) and B (concerning the redevelopment and retention of the operational capacity of the wharf) would both apply to any proposals for these sites.</p> <p>Paragraph 4.173 is only applicable in instances where Part A of Policy LP40 has been satisfied, and it is noted that the allocation itself is as a safeguarded wharf. The approach is not intended or considered to undermine its strategic protection. To clarify this, however, reference should be made to LP40.</p>	<p>Amend paragraph 18.84 as follows:</p> <p>"...The Secretary of State's Safeguarding Directions for wharves <del>identified in</del> <u>took forward the recommendations of the Implementation Report - Safeguarding Wharves Review 2018-2019 recommended</u> that this status is retained for all of Wandsworth's wharves, and that all planning applications affecting safeguarded wharves must be referred to the Mayor."</p> <p>Amend paragraph 4.173 as follows:</p> <p>"Should the safeguarded wharf be de-designated (<u>in line with LP40 - Protected Wharves</u>) then a mixed-use residential scheme could come forward."</p> <p>Amend paragraph 4.173 as follows:</p> <p>"Development of these or adjacent sites will require further discussions with relevant parties, <del>in particular</del> <u>including the agreement of</u></p>	<p>Amendment to paragraph 18.84 is supported.</p> <p>Adding 'in line with LP40 – Protected Wharves' is not sufficient and still implies the potential for redevelopment on this Wharf. The only paragraph that is directly relevant in LP40 to this site allocation is 18.88 which sends one back to development and design considerations under the site allocation.</p> <p>Moreover, development considerations under site allocations must be related to access, public realm that enables/enhances continued use of the wharf without conflicts. Mention of redevelopment of Wharf to a mixed use residential</p>	<p>Ongoing.</p> <p>Particular issues in relation to the reference to de-designation of Pier Wharf, and suggested clarifications in relation to certain other site allocations.</p>



Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
<p>other things) boroughs to protect existing locations and to support development proposals that facilitate an increase in the amount of freight transported on London’s waterways. Part B of LP40 also includes appropriate policy tests which align with the objectives of Policy SI 15 including retaining access and ensuring no reduction to operational capacity.</p> <p>The addition of the reference to wharf uses now included in Part B of Policy LP40 is welcome.</p> <p>We note that paragraph 18.84 now includes a reference to the Safeguarding Directions for Wharves – although suggest that a minor change to drafting would be beneficial to avoid implying that the Direction only ‘recommends’ that all planning applications affecting safeguarded wharves be referred to the Mayor.</p> <p>In contrast to this largely positive policy position, the Mayor is concerned about how the policy is currently being translated into the site allocations at the following safeguarded wharves:</p> <ul style="list-style-type: none"> <li>• Pier Wharf: Paragraph 4.173 Site Layout implies that the safeguarded wharf may be de-designated, and in this case a mixed-use residential scheme could come forward. Based on the Safeguarded Wharves Review which finds this wharf in active use – and noting its particularly high throughput relative to its size – the Mayor would object to this, as it would completely undermine its strategic long-term protection.</li> <li>• Kirtling Wharf / Cringle Dock: Paragraph 5.29 should include a</li> </ul>				<p>Paragraph 5.29 is considered to sufficiently refer to LP40, and it is not necessary to repeat those requirements further. It is agreed that reference to requiring the agreement of the PLA, GLA and Thames Water is appropriate. A similar change should be made to paragraph 5.82 for consistency.</p> <p>It is not considered necessary to add reference to the future use of the site for waterborne freight as the site allocation requires that development must "retain or enhance wharf capacity and operability" and that it must not "result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf."</p>	<p>the Port of London Authority (PLA), the Greater London Authority (GLA) and Thames Water..."</p> <p>Amend paragraph 5.82 as follows:</p> <p>"...will require further discussions with relevant parties, <del>in particular</del> <i>including the agreement of</i> the PLA and the GLA, and a..."</p>	<p>weakens its protection despite policy LP40.</p> <p>The Mayor therefore, recommends deleting the site allocation WT22 Pier Wharf as all the site allocation paragraphs are based on the premise of de-designation and mixed use residential development.</p> <p>For site allocation, NE10 Middle Wharf, the Mayor notes ‘including the agreement of’ does not add much as all planning applications related to safeguarded wharves must be referred to the Mayor.</p> <p>For both Kirtling Wharf and Middle Wharf, the policy intention is apparent, but there is a potential to strengthen the policy wording to create a more specific commitment to safeguarding the wharves for the longer term.</p>	

Reps from GLA, including policy / para no.	SoCG ref #	Rep ref #	Para/ Policy #	LBW Response	Proposed Modification	GLA Response	Status of issue
<p>more specific commitment to safeguarding the wharf for the longer term, and a stronger wording would assist here – replacing ‘discussions’ [‘with relevant parties in particular the Port of London Authority...etc’] with ‘agreement of’.</p> <ul style="list-style-type: none"> <li>Middle Wharf: Paragraph 5.82 should include a commitment to the future use of the wharf for waterborne freight.</li> </ul>							
The Mayor welcomes reference to his Night-Time Economy Classifications and notes that while reference has been made to Clapham Junction which has an NT2 classification, Vauxhall (which also has an NT2 classification) does not appear to have had similar references included.	20	647	LP45 Evening and Night-Time Economy	<p>Support noted.</p> <p>Based on an analysis of the type of developments coming forward within the north-eastern part of the borough (Nine Elms), the potential CAZ retail cluster at Vauxhall identified within the London Plan (as being in both Lambeth/Vauxhall) is not considered to be located within the borough of Wandsworth. This has been agreed with officers at the London Borough of Lambeth, and is reflected in the recently adopted Lambeth Local Plan 2020-2035 as 'Vauxhall Cross' in Policy PN2: Vauxhall.</p>	No change considered necessary		Resolved
The Mayor welcomes Wandsworth’s decision to follow the urban greening factor approach as set out in Policy G5 of the LP2021, and notes the future commitment to a future review.	21	650	LP57 Urban Greening Factor	Comment noted.	No change considered necessary.		Resolved
The Mayor notes that the Policies Map includes the precise boundary of the Thames Policy Area in line with Policy SI 14 and that VNEB and Battersea has been removed from the list of Focal Points of Activity.	22	643	LP59 Riverside Uses, including River-dependent, River-related and adjacent Uses	Comment noted.	No change considered necessary.		Resolved

Appendix:

Figure 1: Proposed modification for industrial policy in BDTQ boundary and SIL

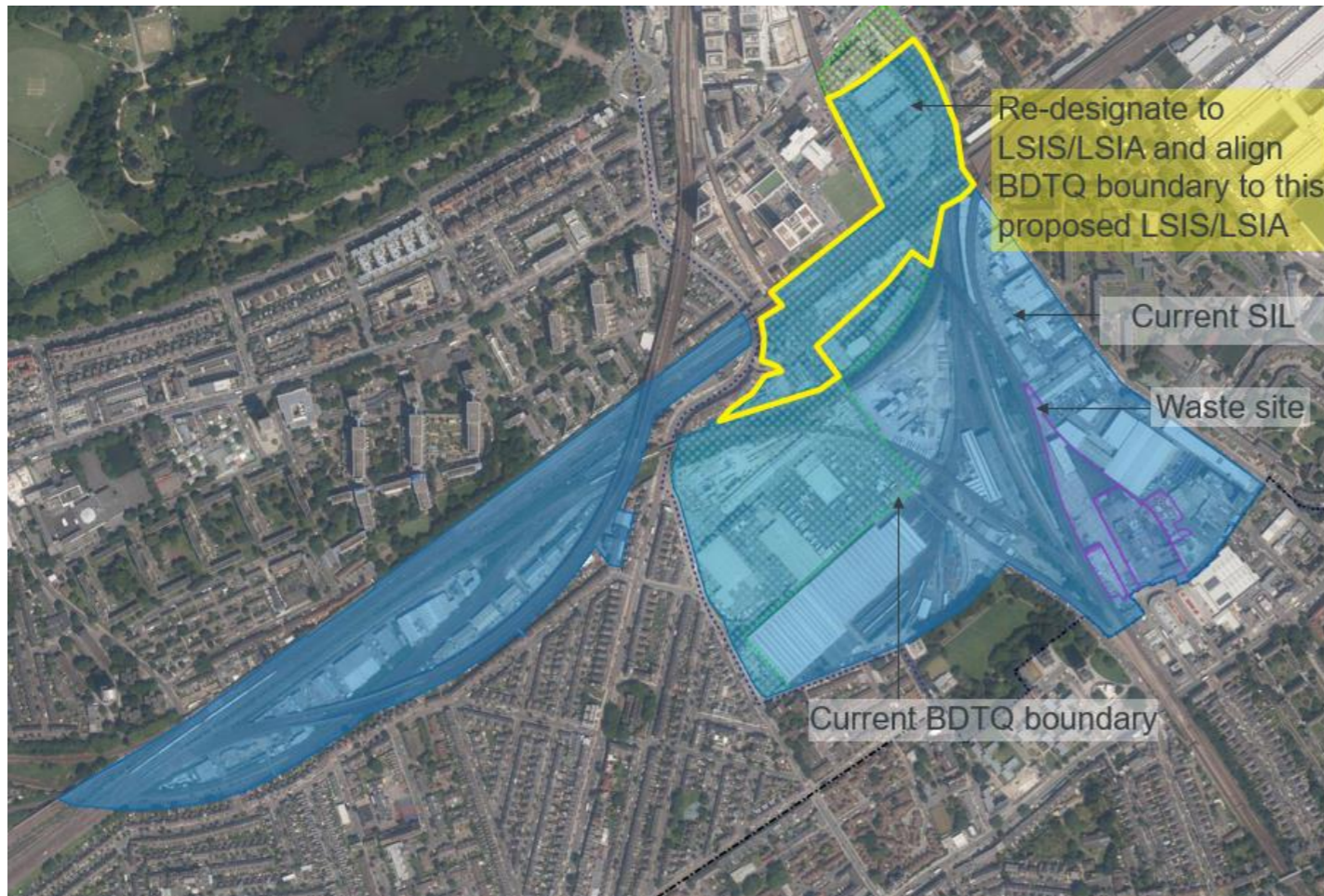




Figure 2: Context of existing uses in SIL that Mayor proposes to retain as SIL

