

## London Borough of Wandsworth – Proposed Main Modifications

March 2023

Anchor is pleased to submit representations to the consultation on proposed main modifications to the Wandsworth Local Plan.

Anchor is England's largest not-for-profit provider of housing and care for people in later life. We provide retirement housing to rent and buy, retirement villages and residential care homes. Across England, we serve more than 65,000 residents in 54,000 homes across almost 1,700 locations. In Wandsworth, we provide 135 homes for older people across three locations.

We are acutely aware of the need for additional homes for older people and are actively looking for opportunities to increase the number of homes we provide within Wandsworth to meet this need.

### Modification Number MM146

Anchor agrees that Policy LP4 should be amended to enable more flexibility around the development of tall and mid-rise buildings outside of identified zones. However, we do not consider that modification MM146 is sufficient to make Policy LP4 justified, effective and, therefore, sound.

The Urban Design Study (December 2021) identifies locations where tall and mid-rise building development is likely to be appropriate, rather than locations where tall or mid-rise development would not be appropriate. The study identifies numerous areas with high development capacity, yet does not identify them as tall or mid-rise zones. While the study identifies 'appropriate heights' for tall building zones, there is no methodology outlined for establishing these. Therefore, while policy LP4 would be justified in directing tall and mid-rise buildings to the identified zones, it should not seek to restrict proposals outside of these zones which otherwise accord with the criteria for assessing tall and mid-rise building proposals and the other policies of the local plan. Policy LP4 should also allow flexibility around building heights.

To be justified and effective, Policy LP4 should be amended as follows:

- **Criterion B:** Proposals for tall buildings will be directed to the ~~only be appropriate in~~ tall building zones identified on tall building maps included at Appendix 2 to this Plan. Proposed tall buildings should ~~where the development would not result in any unacceptable~~ adverse visual, functional, environmental and cumulative impacts. Planning applications for tall buildings will be assessed against the criteria set out in Parts C and D of the London Plan Policy D9 and those set out below as follows:
- **Criterion C:** Proposals for tall buildings will be directed to ~~not be permitted outside~~ the identified tall building zones.
- **Criterion D:** Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones as set out at Appendix 2 to this

Plan, unless it can be demonstrated that this would not result in any unacceptable adverse impacts. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any unacceptable adverse impacts including on the character and appearance of the local area.

- **Criterion F:** Proposals for mid-rise buildings will be directed to the supported in tall and mid-rise building zones identified at Appendix 2, Proposed mid-rise buildings should ~~where the development would:~~
- **Criterion G:** Proposals for mid-rise buildings will be directed to the ~~not be permitted outside the identified tall and mid-rise building zones.~~
- **Criterion H:** Proposals for mid-rise buildings should not exceed the appropriate height identified within the relevant mid-rise building zones as identified at Appendix 2 of this Plan, unless it can be demonstrated that this would not result in any unacceptable adverse impacts.