

Wandsworth Local Plan



Full Review Issues Document

December 2018



Local Plan Review 2018

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1 Issues Document - Introduction



1.0.1 The Council's Local Plan is made up of a set of four development plan documents (DPDs) – the Core Strategy, Development Management Policies Document, Employment and Industry Document and the Site Specific Allocations Document - which together with the London Plan comprise the development plan for the borough. The Local Plan sets out a vision and a framework for the future development of Wandsworth, addressing needs and opportunities in relation to housing, the economy,

community facilities and infrastructure – as well as providing a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. Wandsworth Council is working towards the production of a new Local Plan. This means that the existing Core Strategy, Development Management Policies Document, Site Specific Allocations Document and the outcome of the partial review, the Land and Employment Policy Document, are under review.

1.0.2 The National Planning Policy Framework (NPPF) identifies that reviews of plans are to be completed no later than five years from the adoption date of the plan and should set strategic policies that look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. The intention of the Wandsworth local plan review is to replace the adopted Local Plan and plan for a period of 15 years providing a locally specific spatial policy framework for planning and development in the borough.

1.0.3 The consultation on this document provides an opportunity to help shape the future of the borough. The Local Plan review will:

- Set out a long term vision and objectives;
- Provide a strategy for the borough, delivering new homes, jobs, infrastructure and facilities to meet the borough's needs;
- Set out to manage change whilst protecting and enhancing the area's heritage, culture and natural environment.

Legislation, Policy and Guidance Context

1.0.4 As well as the Council's Local Plan, there are a number of policy documents that together shape the future of Wandsworth, including regional and national legislation, policy and guidance.

1.0.5 The Local Plan must be seen in its wider context of its relationship with Greater London and its neighboring boroughs, but also its relationship with wider Council visions and strategies. The Local Plan will reflect local issues and responses but must also align with national policy (particularly the National Planning Policy Framework), the Local Plan must:

- Reflect changing circumstances affecting the borough;
- Take account of national planning policies and their support for sustainable development;
- Be based on an objective assessment of the borough's development needs;
- Have regard to the various other strategies of the Council and its partners;
- Take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage;
- Be supported by a Sustainability Appraisal. This is a legal requirement and is used at different stages to assess the impacts of the Plan;
- Be in conformity with the London Plan, which sets out the strategic planning context for London.

National Planning Policy Framework and Planning Practice and Guidance

1.0.6 The Government published a revised National Planning Policy Framework (NPPF) in July 2018 the revised framework implements around 80 reforms from the housing White Paper and Autumn Budget 2017, in a shorter and more streamlined format. It combines stronger protection for the natural environment, with a greater emphasis on meeting the housing needs of communities.

1.0.7 The revised Framework implements a new standard method for calculating local housing need, to enable all communities to have a clear, transparent understanding of the homes they need as a minimum.

1.0.8 The NPPF sets out the Government planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development, which means that local planning authorities should positively seek opportunities to meet the development needs of their area, with sufficient flexibility to adapt to rapid change. Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

Paragraph 16 of the NPPF states that:

Plans should;

- *be prepared with the objective of contributing to the achievement of sustainable development;*
- *be prepared positively, in a way that is aspirational but deliverable;*
- *be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*
- *be accessible through the use of digital tools to assist public involvement and policy presentation; and,*
- *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

The London Plan

1.0.9 The London Plan sets out the Mayor’s vision and objectives for the capital, and seeks to ensure that London is a city that meets the challenges of economic and population growth covering a full

range of planning issues, from the number of homes London needs to the design of its streets, the Plan sets out policies that taken together provide a vision for how London should sustainably grow and develop in the future.

Programme

1.0.10 This Issues document sits within a wider programme to deliver the revised Local Plan and will be the first consultation document in its production. In producing this document the Council has undertaken a review of the adopted Local Plan, including the emerging Local Plan Employment and Industry document, its policies and evidence.

Timetable

1.0.11 This consultation is the first statutory stage (Regulation 18) in the process of developing a new Local Plan for Wandsworth and will lead on to the production of an options (including preferred options) document for consultation before the submission of a plan for examination.

1.0.12 The production of the new plan will go through a number of stages set out on the Council's Planning Policy Web Pages.

Why are we reviewing the Local Plan?

1.0.13 Keeping the Local Plan up to date is a priority for the Council and derives from the need to ensure local policies and site allocations remain up to date and are supported by the best possible evidence in order to be effective and robust. The need to keep the plan up to date has recently become more significant due to new national (NPPF 2018) and regional (draft London Plan 2018) policy. The preparation of the Wandsworth Local Plan is scheduled to follow on from the adoption schedule of the draft London Plan in order that its policies and evidence base achieve appropriate consideration.

1.0.14 The Local Plan is a reflection of the aspirations and choices of the local community. However, the Plan must comply with specific requirements set out in national planning policy and legislation. The National Planning Policy Framework sets the wider planning framework and direction for policy making and is set by the Government. The London Plan sets out strategic policies for London, the Wandsworth Local Plan needs to be found to be in general conformity with the London Plan and adhere to National Planning Policy in order to be found 'sound' at examination and adopted as the Local Plan for Wandsworth.

1.0.15 The Council's adopted Local Plan documents are consistent with the 2011 London Plan, since then London's population has continued to grow and the borough's annual housing target has risen from 1,145 (London Plan, 2011) to 1,812 (London Plan, 2016). The draft London Plan now proposes an annual housing target for Wandsworth of 2,310.

1.0.16 The borough has been successful in delivering on its housing targets accommodating the more recent increases in dwelling numbers. However to accommodate the draft London Plan's proposed increase a review of the Local Plan is required. To accommodate the level of additional growth required the borough will need not only new homes, but a significant increase in jobs and additional improvements to social and physical infrastructure to meet existing and new residents' needs.

1.0.17 As well as taking account of the relevant legislation, regulations and Government policy, this Issues document seeks to understand how the Council's corporate objectives setting the framework for how these commitments can be achieved in spatial development terms.

What is the Aim of this Document?

1.0.18 This document is a chance to have your say on what is affecting the areas in the borough where you live, work and play. The document does not set out to tell you what the Council intend to do rather it sets out the issues the Council has identified following a review of the existing Local Plan and National and Regional policy and guidance and from the production of an Integrated Impact Assessment Scoping Report. It provides an opportunity for residents, visitors, and businesses in the borough to contribute to the discussion by seeking views and input early on in the plan making process. The document does not seek to limit answers to two or three options. Instead, this document sets out the background information, issues and challenges facing the borough across a range of topics.

1.0.19 The Council is not, at this stage, stating which sites it will be looking to allocate for development or setting out new policies it intends to include in the new Plan.

What will be superseded by the Local Plan Review?

1.0.20 The Local Plan Review is assessing all adopted policies and site allocations contained in the adopted Local Plan Development Plan Documents and emerging LPEID to ensure that they remain up to date and are supported by the best possible evidence. The responses to this consultation and the wider review of the supporting evidence base, relevant legislation, regulations and government policy will inform the next stage of consultation which will set out the options available to the Council and its preferred policy options to address the issues presented in this document.

What Local Plan Review work is being undertaken?

1.0.21 To ensure the Local Plan's policies and site allocations are up to date and are supported by the best possible evidence in order that they are effective and robust the Council are working to develop a number of evidence based documents to support subsequent stages of the Local Plan Review process including:

1.0.22 Housing Needs Assessment The borough needs to develop an objective assessment of different types of housing need in the borough and identify how those needs could be met. The

Housing Needs Assessment (HNA) will assist with plan making and developing policies to support the delivery of the size, type and tenure of housing needed for different groups.

1.0.23 Open Space Study The NPPF requires new policies to be evidenced by up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative deficits or surpluses). This evidence will determine what open space, sport and recreational provision is needed, which the new Local Plan will seek to accommodate.

1.0.24 Town Centre and Retail Needs Assessment An update to the Council's Town Centre and Retail Needs Assessment (2012) is required which will assess demand and supply for shopping and other town centre uses such as food and drink, leisure and the night time economy to define a quantitative need over a 10 year period. The assessment will inform and refine the network of town centres and primary shopping areas and inform measures to accommodate growth and diversification and respond to rapid changes in the retail and leisure industries. The Assessment will also suggest a range of suitable sites in town centres to meet the scale the type of development expected.

1.0.25 Urban Design Study Good design is now seen as critical to achieving the growth required in London and the borough need to prepare an evidence base to support the formation of new design policies.

1.0.26 Call for Sites The Council will open a 'Call for Sites' to identify sites within the borough that may have potential for development over the plan period. As part of the Call for Sites exercise, invited landowners, agents or potential developers and other interested parties will be asked to put forward sites for consideration which might have potential for contributing towards Wandsworth's future needs for housing, employment, retail, education, health and other uses during the plan period.

1.0.27 Employment and Industry Update The AECOM Employment, Land and Premises Study 2016 assessed the quantity, quality and viability of the borough's employment land to form an evidence base to support the emerging Employment and Industry Document (LPEID). The new NPPF and the Mayor's draft London Plan mean that the Employment, Land and Premises Study needs to be reviewed and updated.

1.0.28 Whole Plan Viability Assessment The overall aim of a Whole Plan Viability Assessment (WPVA) is to provide a robust and proportional evidence base for the assessment of development viability in Wandsworth. This includes an assessment of the cumulative impacts on overall development viability of infrastructure requirements and policy requirements within the Local Plan so as to ensure the proposed policies are deliverable.

How will the Local Plan Review affect and support Neighbourhood Plans?

1.0.29 The Localism Act 2011 introduced new rights and powers to allow local communities to help shape and manage new development in their local area by coming together to prepare neighbourhood plans. Neighbourhood plans can direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.

1.0.30 Neighbourhood plans will typically set out the use and development of land, and can provide a range of detailed policies and proposals for an area, or a single policy relating to a specific issue, such as the design of new buildings. Neighbourhood plans cannot promote less development than set out in the London Plan or in Wandsworth's strategic policies for the area, or undermine those strategic policies. Wandsworth will therefore engage and consult with residents and businesses, including with neighbourhood forums during the Local Plan review process.

1.0.31 The Council has designated the Tooting Bec and Broadway Neighbourhood Area and the Tooting Bec and Broadway Neighbourhood Forum on 4 April 2017 following public consultation.

1.0.32 It is anticipated that the designated Tooting Bec and Broadway Neighbourhood Forum will prepare a neighbourhood plan, which must be in accordance the adopted Local Plan and the London Plan. Neighbourhood plans must be in general conformity with the

strategic policies of an adopted local plan. Once 'made' neighbourhood plan policies form part of the development plan used when determining planning applications.

1.0.33 As the Local Plan review moves forward, emerging neighbourhood plans will also have to respond to changes in emerging Local Plan policies, bringing them in line with the strategic requirements of the Plan.

Duty to Cooperate

1.0.34 The Local Plan review must be prepared in accordance with the Duty to Cooperate. This sets a legal duty for the Council and other public bodies. The Council must engage constructively, actively and on an on-going basis on planning issues which affect more than on local planning authority. The Council will need to produce Statements of Common Ground at each stage of the Local Plan process. These will set out what authorities do and don't agree on in relation to strategic cross boundary issues.

1.0.35 Wandsworth will need to work with the Greater London Authority, neighbouring London boroughs, other South London boroughs, statutory bodies and other infrastructure providers to ensure that the Local Plan addresses cross-boundary issues and reflects wider strategic priorities, including considering any needs that cannot be met in adjoining areas. The Council will also consult with residents and businesses, including working with neighbourhood forums.

How do I respond to this consultation document?

1.0.36 Wandsworth Council are keen to receive views on any aspect of the Local Plan Review and you are welcome to respond to any or all of the questions contained in this document. The Council will be undertaking the consultation in accordance with its Statement of Community Involvement. Should you only wish to answer one question, please feel free to do so. General comments on the planning issues facing Wandsworth or ideas and suggestions about any matters not contained in this document are also welcome.

1.0.37 Consultation will take place over an extended period of eight weeks from the week commencing 3rd of December 2018.

How to Respond

- Online via the consultation portal http://www.wandsworth.gov.uk/info/1004/planning_policy
- Or you can send comments via email to: planningpolicy@wandsworth.gov.uk
- If you prefer you can also write to us at: Policy and Design Team, The Town Hall, Wandsworth High Street, London, SW18 2PU

Please ensure that you provide contact details when submitting a response.

What are the next steps?

1.0.38 This document identifies a wide range of issues and challenges that face the borough over the next 15 years. It poses a series of questions, grouped into the following chapters:

- Growth
- Housing
- Employment and Town Centres
- Transport
- Environment
- Infrastructure

1.0.39 The results of this consultation will be used to develop a document containing the preferred policy options for the new Local Plan. The Council will publish the preferred options document for consultation in line with the timeframe set out in the [Local Development Scheme on the Councils webpages](#).

The Characteristics of Wandsworth

1.0.40 Wandsworth is one of the largest inner London boroughs, stretching from central London at Vauxhall out to the edge of Richmond Park in the west. Home to a population of approximately 323,300 people it includes a diverse range of communities and many distinct districts. A third of the borough's land area is occupied by residential properties, many within one of the forty five conservation areas. A quarter of the borough's land area is open space, much of this in the form of large areas of heath and common. The five town

centres and the nine local centres give focal points and identity to the communities that make up the borough. The quality of much of the townscape together with the close proximity to central London, abundance of green space, range of popular schools, and a number of thriving high streets has shaped Wandsworth into one of the most sought after places to live in London.

1.0.41 Strategic radial transport routes, both rail and road, converge in Wandsworth, crossing other routes. Eight Thames bridges link the borough to the north side of the river. The transportation opportunities offer good accessibility from much of the borough, particularly to central London, with orbital movement facilitated by the completion in 2012 of the London Overground Orbital route, new river bus stops, the North London Line, Cross Rail, two cycle routes and the Transport for London TfL hire bikes.

1.0.42 Wandsworth has five town centres serving the distinct areas of Balham, Clapham Junction, Putney, Tooting and Wandsworth. The town centres are backed up by nine local centres, and 23 important local parades which together provide a wide range of services including retailing, leisure and entertainment, complementary community facilities, and business floor space. A major new town centre is proposed at Battersea Power Station which alongside the existing town centres will be the focus for larger-scale shopping and other complementary town centre activities and uses.

1.0.43 Currently 141.9 hectares of land is in industrial use in the borough (Employment Land and Premises Study 2016). This is made up of 78.9 hectares of land used for core industrial uses; the

remainder is used for wider industrial uses, including wholesale markets, waste management, utilities and land for transport. This land houses some 360,800 sqm of industrial floor space. Rental values for industrial floor space have increased significantly in recent years. There are also very low rates of unoccupied vacant premises and available space.

1.0.44 Large-scale offices in Putney and, to a lesser extent, Wandsworth town centre were developed in the 1960's. with many of these sites having been redeveloped in recent years for a mix of uses as the premises have become redundant and office densities have increased. Purpose-built offices for smaller firms have been developed in recent years, replacing some of the heavier industry in sites along the Thames, providing more appropriate and flexible space for current economic needs and taking advantage of the proximity to central London. Many small offices remain in use providing space for a wide range of small and medium-sized enterprises (SMEs) which make up the majority proportion of businesses in the borough. In recent years with the introduction of permitted development, some offices in town centres and other good locations have been converted to residential use. The borough has 400,600 sqm of office floor space. 10,400 sqm (2.6%) of this is currently vacant, with a further 71,600 sqm (17.8%) of available floor space. Office floor space has increased in value from an average of £214/sqm in 2007 to £318/sqm in 2016 - the equivalent of a 49% increase.

1.0.45 The borough is home to much of the Vauxhall Nine Elms Battersea Opportunity Area, part of which is within the Central Activities Zone (CAZ), and which contains 227 hectares of land stretching from Lambeth Bridge to Chelsea Bridge. In planning policy terms, the area is classified as an Opportunity Area in the existing London Plan, designating it as an area for major high density housing and employment growth with over six million square feet of commercial space and the capacity to accommodate over 25,000 jobs this development area has the potential to transform Wandsworth's economic future.

1.0.46 Overall there is capacity for office development in Nine Elms in the region of 205,000 sqm this is targeted at securing large national and multinational occupiers; for example the digital firm Apple has been identified as a key future occupant for a large quantity of office floor space at Battersea Power Station. The presence of Apple in the borough will act as a catalyst for the digital industry as well as the creative sector which is associated with and supports the digital industry.

1.1 Vision and Objectives

1.1.1 The existing Local Plan adopted a broad vision and set of supporting objectives for the borough, the Council now needs to consider whether these remain appropriate or not. To help develop a new Local Plan the existing vision should be tested and if necessary amended to reflect new opportunities and issues that may have arisen. Having fully considered the changes, issues, opportunities,

and the responses to this consultation the Council will prepare a new vision and series of corresponding objectives for the new Local Plan. The current adopted Local Plan vision for the borough is:

- a borough of attractive and distinctive neighbourhoods, separated by parks and commons, with a good range of local services focused on five existing distinct town centres at Battersea (Clapham Junction, Wandsworth, Putney, Tooting and Balham, backed up by local centres in each district, with the retention and enhancement of its significant housing stock.
- Regeneration activity including tackling pockets of deprivation in Battersea, Tooting and Roehampton, with the main areas of change and development of a new town centre at Battersea Power Station.
- New mixed use quarters opening up the riverside and well linked into existing communities.
- Housing development of good quality, sustainable design, employing the latest innovations in energy reduction and the provision of renewable energy, to provide homes, including affordable homes, for the growing number of households seeking to live in the borough.
- A range of opportunities for local business activity, including start up and small enterprises, in mixed use developments.
- A strategic pool of key industrial sites in the Wandle Valley corridor and parts of Nine Elms and north-east Battersea, continuing to provide opportunities for industry and warehousing which are better located outside residential areas, as well as new waste management facilities.
- Investment in public services throughout the borough as opportunities arises.
- An enhanced local environment including cleaner air and less traffic congestion, with protected and improved habitat and biodiversity, particularly along the Thames and Wandle Valley corridors, the green chain network and the borough's parks and open spaces.
- Good access to the wider opportunities outside the borough for jobs and services, particularly in central London.

1.1.2 To achieve this vision the Council has set strategic objectives under three key themes:

Environmental Objectives

- Secure sustainable development in the borough to help tackle climate change, protect and enhance the quality of life and improve environmental, social and economic opportunities.

- Protect, reinforce and repair the existing distinctive character of the different districts of the borough, placing full value on the heritage and amenity of each different district.
- Protect and enhance open spaces and the natural environment, and seek the protection and enhancement of habitat and biodiversity.
- Manage waste more efficiently - reduce; reuse; recycle and recover energy from waste to landfill, in accordance with strategic targets.
- Promote low carbon development through increased energy efficiency and the proportion of energy generated locally and from renewable sources. Encourage the use of sustainable building techniques and sustainable water resources.
- Protect people from risks to their health and safety, and damage to their amenity.
- Reduce the environmental impact of transport without reducing access.
- Protect and enhance the River Thames and its tributaries.
- Manage the consequences and reduce the risk of flooding.

Social Objectives

- Secure a range of new housing development to meet different needs and demands, including that for affordable and special needs housing.
- Ensure that the strategic target for housing completions in Wandsworth is achieved.

- Provide for the needs of and improve access to educational, social, welfare, health, community, police and prison services.
- Create safer, healthier and more secure communities.
- Promote equality of opportunity, including seeking to ensure that new development is accessible for people with disabilities.

Economic Objectives

- Seek to maximise the employment potential of land in the borough by safeguarding land and buildings for business and industrial use and promoting development for employment purposes in appropriate locations including as part of mixed use development so as to increase job and business opportunities.
- Promote the provision of flexible business space to meet the needs of the small and medium enterprises which comprise the overwhelming number of businesses in the borough.
- Secure regeneration in areas of deprivation to reduce poverty and social exclusion.
- Seek to ensure that the scale of development is related to environmental capacity and the capacity of public transport and other infrastructure.
- Increase the viability and vitality of the town centres and local centres, including the proposed centres at Battersea Power Station and Vauxhall, as the focus for shopping and for employment and leisure and other community activities.
- Promote development proposals that contribute to a safe, accessible and integrated transport system and proposals that

contribute to London's overall transport system, with improved accessibility to surrounding areas, especially central London.

Question 1

Is the existing Local Plan's vision appropriate in guiding the Local Plan review? If not, what changes should be made?

Key Diagram

1.1.3 The Plan will need to include a key diagram providing an overview of the spatial vision and key features. The Current diagram (Map 1) is set out below, The Council intends updating the diagram to reflect the CAZ frontage and the emerging new town centre at Battersea Power Station and new tube stations on the Northern Line Extension.

Question 2

Is the existing Local Plan Key Diagram appropriate for the Local Plan review, if not, what changes should be made?

Map 1 Key Diagram



1.2 Growth and the Spatial Distribution of Development

1.2.1 Wandsworth needs to plan for substantial population growth to ensure that Wandsworth has the homes, jobs, services, infrastructure and opportunities a growing and increasingly diverse population needs.

1.2.2 The Local Plan provides an opportunity to proactively encourage development in appropriate locations. Providing more certainty as to where and what kind of development can be expected to come forward is of benefit for residents of the borough, landowners and developer. Achieving a critical mass of development centred on priority areas allows for a more co-ordinated approach to delivery that supports planned infrastructure and better place making. Medium to high levels of density also support shorter travel distances to, and higher patronage of, local facilities and public transport services. With good design these densities can support, rather than detract from, the creation of pleasant environments that positively contribute to the surrounding areas character, vitality and vibrancy. Clustering of employment space supports more productive and sustainable economic activity.

1.2.3 The Core 'Policies for Places' section of the adopted Core Strategy set out the spatial approach to growth and change to be applied across the borough. The section usefully integrates the different spatial functions of what, when, where, and how. These are brought together into a vision of how the borough would develop

over the lifetime of the plan. Setting out that for large parts of the borough, change would be small-scale; the strategy has been to protect the positive distinctive characteristics of areas while allowing significant development and regeneration to take place in key areas. The adopted local plan identified key priority areas for development:

- River Thames and the riverside (Policy PL 9)
- The Wandle Valley (Policy PL 10)
- Nine Elms and the adjoining area (Policy PL 11)
- Central Wandsworth and the Wandle Delta (Policy PL 12)
- Clapham Junction and the adjoining area (Policy PL 13)
- East Putney and Upper Richmond Road (Policy PL 14)
- Roehampton (Policy PL 15)
- The Lombard Road/York Road (Riverside Focal Point SPD).

Question 3

Do you agree that the key priority areas identified in the existing Local Plan are the correct areas to sustain much of the borough's growth, and are there any other areas you think are appropriate?

Design Led Density

1.2.4 One of the main issues the Local Plan will need to address is how many new homes are needed to meet the demands of those seeking accommodation in the borough and where they are to be built. Therefore, the assessment of land and development capacity is an important component of enabling future growth. Wandsworth has a housing target that is set in the context of the London Plan and the National Planning Policy Framework (NPPF). The draft London Plan sets a target for Wandsworth of 23,100 additional homes to be provided over the 10 year period 2019/20-2028/29 this represents an annualised average target of 2,310 new homes per year and represents a 27% increase over the 2015 London Plan target of 1,812 and a 50% increase over the 2011 London Plan target for Wandsworth of 1,145. The borough has been able to meet its housing targets in previous years and the new local plan review will need to prepare and consider evidence to ascertain if the borough can achieve this new target. Many factors affect housing delivery including the wider London economy and market trends.

1.2.5 The draft London Plan and the updated NPPF have both provided new focus on making efficient use of land, the draft London Plan requires that the optimisation of density achieved through a design led approach. The impact of this new focus is perhaps best explored in draft London Plan Policies H2 Small Sites and D8 Tall Buildings.

Small Sites

1.2.6 London Plan Policy H2 Small Sites sets out that small sites should play a much greater role in housing delivery to achieve housing targets and that boroughs should pro-actively support well designed new homes on small sites. The draft policy introduces a presumption in favour of small housing developments (defined as developments below 0.25 hectares in size delivering between 1 and 25 homes) which are:

- Infill development
- Proposals to increase the density of existing residential houses within areas of good transport connectivity (PTALs 3-6 or within 800m of a station or town centre boundary (see Map 2 below)
- The redevelopment or upward extension of flats, non-residential buildings and residential garages to provide additional housing

1.2.7 Wandsworth has historically delivered a large number of small housing developments with a yearly average of 418 units delivered from small housing developments in the borough over the past five years (roughly 24% of the total number of homes delivered). The Mayor of London has set a target for Wandsworth of 774 for net housing completions on small sites per annum (7,740 additional dwellings to be delivered from 2019/20-2028/29). The Council has launched a call for sites exercise, and has identified the need for an urban design study, to better understand small sites capacity in the borough.

1.2.8 Map two below demonstrates areas in the borough where the draft London Plan (if adopted in its current form) small sites policy could apply a presumption in favour of small housing developments (Incremental Intensification Areas). This could mean that the Council may have to approve small housing developments unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision. The map has excluded Conservation Areas, Metropolitan Open Land and Public Open Space. The Council can develop a design guide or design code to guide small sites development.

Question 4

Should the Council develop a design code for small housing developments, if so what should a Wandsworth design code for small housing developments consider?

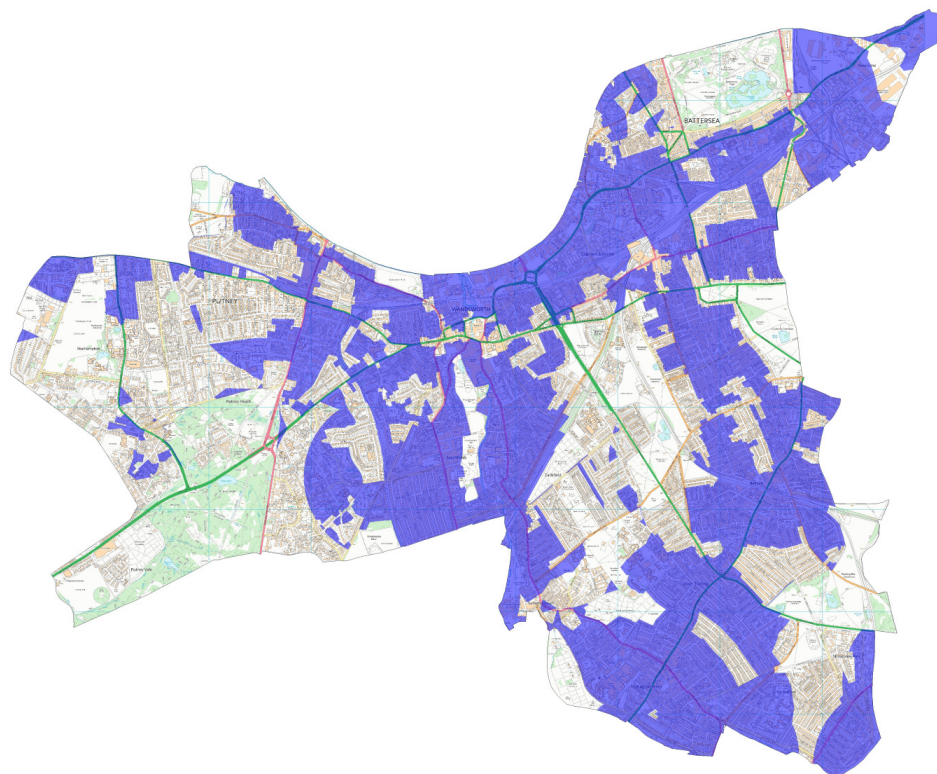
Question 5

If the Council were to develop a design code for small housing developments are there any areas that should or should not be considered?

Question 6

What can the Council do to better support small site development in appropriate locations in the borough?

Map 2 Draft London Plan Proposed Small Site Intensification Areas



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Tall Buildings

1.2.9 The existing Wandsworth Local Plan defines tall buildings as those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline. The height at which buildings are currently considered tall alongside detailed criteria for assessing the design and impact of tall buildings and their appropriateness is set out in the Development Management Policies Document and Site Specific Allocations Document, having regard to the Council's Stage 2 Urban Design Study – Tall Buildings. The Stage Two Urban Design Study provided:

- consideration of the appropriateness of sites for tall buildings, identifying whether they are appropriate, inappropriate or sensitive;
- an analysis of the areas where tall buildings may be appropriate, indicating for individual sites, the height at which a building will be regarded as a tall building;
- a definition of the height at which a building will be regarded as a tall building in the remainder of the borough, where tall buildings are likely to be inappropriate, and;
- detailed criteria for the evaluation of proposals for tall buildings.

1.2.10 Tall buildings can, if well designed, create attractive landmarks underlining aspects of the borough's character and acting as a catalyst for regeneration. They can be an efficient way of using land in line with sustainability objectives, and add definition to the borough's skyline. It is important that tall buildings have a positive

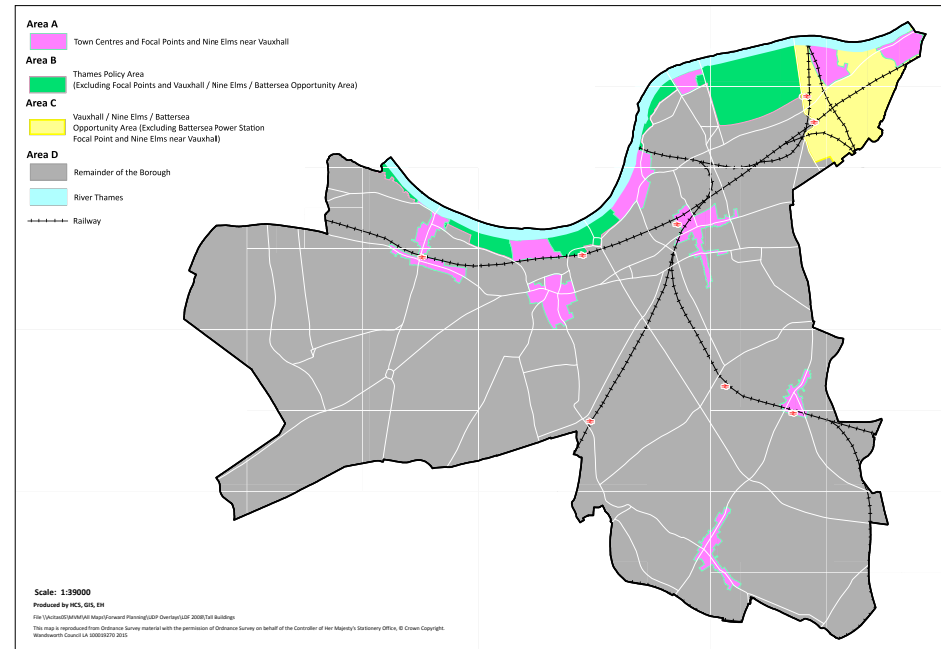
relationship with the surrounding townscape; both in terms of their immediate setting at ground level and their relationship to open space and other buildings nearby. This is important in terms of the role well designed tall buildings can play in place shaping and contributing to legibility both at a local and a city wide scale. Existing Local Plan Policy DMS 4b sets out detailed criteria applications for tall buildings will be required to address. To ensure that the location and design of tall buildings reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to development applications it is important that tall buildings are sustainably developed in appropriate locations subject to meeting the other requirements of the Plan and are of the required design quality. To achieve this, Wandsworth should continue to plan for tall buildings.

Question 7

Do you agree with the Council's current approach to Tall Buildings?

Please explain your answer.

Map 3 Wandsworth Tall Building Policy Areas



Question 8

Do you agree that the locations where tall buildings may be appropriate and the locations where tall buildings are likely to be inappropriate as set out in the existing Local Plan policy DMS4 Tall Buildings (see table 1. And Map 3 below) are correct?

If not please explain your answer.

Question 9

To meet the challenging growth needs for homes, businesses and infrastructure should Wandsworth:

- **Encourage more tall buildings in key locations in the borough and work to increase the housing numbers provided on large sites; and or**
- **Place greater emphasis on higher densities across the borough, even if this means compromising some existing standards, e.g. open space or introducing more flatted developments in to typically low density areas including single family housing areas?**

Wandsworth's Character and Heritage Assets



1.2.11 Wandsworth's built form is largely characterised by 19th and early 20th century terraced housing, with a significant number of public housing estates, low and high-rise. In recent years, high rise mixed use developments have become increasingly a feature of the Thames riverside areas previously occupied by heavy industry and public utilities. The housing stock continues to be added to by conversions of larger houses into flats, and extensions to existing dwellings.

1.2.12 For many people Wandsworth is already an attractive place to live. While the borough has to accommodate considerable new growth over the new plan period and beyond large parts of the borough such as in the 45 conservation areas ([Map of Heritage Assets](#)) change is likely to be smaller scale. Character appraisals have been prepared for each of the conservation areas which set out the special character and distinctiveness of these areas. The additional controls and enhancement measures available within the borough's conservation areas will be particularly valuable in helping maintain local distinctiveness. Many areas are characterised by attractive family housing and the adopted Local Plan has policies to resist their conversion to flats. There are also areas that the Council consider to have a special character where the combination of uses and or aspects of historical or architectural significance may warrant recognition in planning policy of the special character of the area.

1.2.13 The NPPF encourages local plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This includes managing positive change affecting heritage assets, including better revealing and enhancing their significance, adaption to new uses and retaining and repairing buildings, structures and places. A positive strategy can diversify and enhance the borough's building stock to meet the needs of a range of occupiers for different types of housing, office accommodation and retail or other uses, as well as enhancing the character of places for residents, workers and visitors.

1.2.14 While much of the borough is a safe, prosperous and attractive place to live there are still pockets of deprivation in certain areas. The Council promotes and supports regeneration opportunities in partnership with local communities and business interests.

1.2.15 Wandsworth's character has and will continue to change over time. Recent major developments have formed new areas with their own unique character. Vauxhall Nine Elms Battersea and the Ram Brewery are prime examples where the high demand for new development is being met alongside the creation of living and working environments of the highest quality. Looking forward Clapham Junction and Roehampton have been identified as new areas for development with Clapham Junction receiving designation in the draft London Plan as a nascent Opportunity Area linked to the potential development opportunities presented by Cross Rail 2.

1.2.16 Clapham Junction is Europe's busiest interchange station, and a designated Major town centre. The proposal for a Crossrail 2 station presents a major opportunity to make more efficient use of land surrounding the station for residential and commercial development, including new offices. The Council could seek to develop a Planning Framework with partners including TfL and the GLA to fully explore and evaluate options for comprehensive over-station development, which would be reliant on a reconfiguration of the station layout and focused on enhancing local context, ensuring new development positively responds to the local distinctiveness, existing and emerging street hierarchy, building types, forms and proportions.

Question 10

Are there any existing heritage assets which have lost their special character and should no longer be designated? Please identify the heritage assets and justify why they have lost their special character or significance.

Question 11

In addition to conservation areas, are there any other areas with a special character that warrant recognition in policy and should inform the types of new development that will be acceptable in those areas?

Question 12

Are there areas of Wandsworth which are in need of regeneration, where development should be encouraged to change and improve the character? Please provide details.

Urban Design



1.2.17 The NPPF and draft London Plan both give a new centrality to design policies, with the NPPF supporting 'local design standards or style guides', and the draft London Plan elevating design codes and policy as critical to identifying the capacity for growth and understanding how to deliver it in a way which strengthens what is valued in a place. The draft London Plan also states that 'Development must make the most efficient use of land and be designed at the optimum density'. Wandsworth has undertaken and published detailed character analysis for conservation areas set out

in its conservation area appraisals; adopted local design guidance for residential extensions and specific guidance for the Lombard and York Road Riverside focal point of activity. The Council has also published a tall buildings study which provided the evidence for our current core strategy approach to tall buildings.

1.2.18 To support the formation of new design policies and explore the potential of design codes the borough will need to develop new evidence to ensure that development enhances local context and that these are drawn up through effective engagement with local communities, relevant parties such as Historic England and with proper regard to national planning policies and the London Plan. One way to achieve this would be through the production of an Urban Design Study identifying how the Council can support the delivery of buildings and spaces that positively respond to local distinctiveness through form and layout, and quality and character.

1.2.19 The study would identify capacity for growth and seek to understand how to deliver it in a way which strengthens what is valued in a place. The Urban Design Study would help to identify the most appropriate forms of development across designated areas in the borough, setting out appropriate scale, height, density, layout and land uses to ensure that the most efficient use of land is made.

1.2.20 What constitutes good design is complex, and depends on the combination of multiple aspects. The existing urban form, location of the development, and the provision of local infrastructure are key aspects that the Urban Design Study will focus on.

1.2.21 Across the varied townscapes of the borough, a range of responses will be required to positively respond to the particular needs of distinct areas in terms of both the urban/typological form but also the architectural and material responses that good design might explore.

Question 13

Should the borough develop an Urban Design Study, if so what should it consider?

Question 14

Please provide any locations that you feel provide a good or bad example of urban design in the borough and explain why.

1.3 Housing



1.3.1 Housing covers a wide range of topics from the overall delivery of housing, to the provision of affordable housing and specialist housing for a variety of different groups. The National Planning Policy Framework sets out that all local authorities need to identify a local housing target to inform strategic policies. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

1.3.2 The Council's Housing Strategy sets out the Council's housing priorities, identifies how the borough identifies and addresses local needs and recognises the importance of increasing the range of housing options including low cost homeownership and housing for rent. The Council has one of the best track records in the delivery of housing in London and is committed to accelerate the development of high quality housing to meet a broad range of demands, this will include supporting and encouraging approaches to bring forward land, including public land for development and securing related improvements in infrastructure.

The main issues the local plan will need to address in terms of planning for new homes are:

- Population growth means that an additional 23,100 homes are needed in Wandsworth by 2029 to meet the need for new homes.
- Meeting the need for affordable housing while also ensuring that development is viable and much needed market homes are delivered in the borough.
- During the lifetime of the new plan (15 years) the borough will begin to run out of what is a limited supply of developable land available for residential development within the existing Town Centres, focal points and site allocations.

- The need to meet housing targets is great but this should also allow for land to be provided for employment, education, health, retail and other community facilities.
- Managing the sustainable growth that contributes to the vitality and viability for town centres without undermining the borough's valued character and heritage.

Wandsworth's Housing Target

1.3.3 London wide there is not a sufficient supply of housing to meet the housing need of the city. This has far reaching impacts that largely centre on affordability or lack thereof, resulting in people living in accommodation that is unsuitable for their needs. To address this, the draft London Plan sets a London wide housing target and assigns each borough an individual target. In Wandsworth that target is 2,310 per annum (23,100 additional dwellings to be delivered from 2019/20 – 2028/29) and is based on what the Mayor considers to be achievable following a comprehensive study of available sites for housing. The draft London Plan also requires that boroughs plan positively to meet the target.

1.3.4 The government recognises that it is appropriate for the London Plan to decide how the London wide housing target is distributed between boroughs. However, Government has openly stated that the draft London Plan's assessment of need does not reflect the full extent of housing need in London. To tackle affordability problems the Government expects that the Mayor of

London carry out a review of the London Plan immediately following adoption. This means that Wandsworth is soon likely to be required to deliver on an even greater housing target than the 2,310 per annum contained in the current draft London Plan.

1.3.5 There is a strong link between housing policy and place making policy, the creation of mixed and balanced communities is an on-going priority for the Council. Delivery of a range of housing types and mix of tenures will aid the creation of well-connected and sustainable communities and therefore contribute significantly to place making objectives.

1.3.6 The provision of a range of housing types and tenures can also help meet wider identified housing needs including for those seeking to purchase their first home in the borough, freeing up private rented accommodation, and to provide a local supply of smaller homes for people wishing to downsize but continue living in the borough, which will also increase the availability of under-occupied family-sized housing suitable for families and adult sharers.

Affordable Housing

1.3.7 Delivering a range of affordable housing options is a key strategic issue for London and Wandsworth. Wandsworth's existing Local Plan policies seek the maximum reasonable amount of affordable housing, having regard to affordable housing targets and the need to encourage and enable rather than restrain residential development.

1.3.8 As part of the preparation of the evidence base to support the new plan, the Council will prepare a whole plan viability assessment that will include an assessment of the economic viability of affordable housing in the borough taking account of London wide targets. The NPPF now places greater emphasis on viability assessment at the plan making stage and the Council will have to undertake this work to show that the policies in the Plan do not unacceptably impact development or undermine the deliverability of the plan. The Council's existing plan sets out that the Council will seek the maximum reasonable amount of affordable housing. On individual sites outside Nine Elms a proportion of at least 33% of homes should be affordable, in Nine Elms at least 15% should be affordable subject to viability assessment, the reduced figure for Nine Elms is due to other infrastructure requirements required in Nine Elms that reduce overall scheme viability.

1.3.9 The draft London Plan has a long term policy ambition for 50% affordable housing, and includes an expectation that applications for developments delivering 35% affordable housing with a policy compliant balance of affordable housing tenures, will not need to be supported by a financial viability appraisal. Within the affordable housing provision the Mayor of London identifies that this should be provided at minimum as 30% low cost rent (social rent/London affordable rent) and 30% intermediate ownership, the remaining 40% is for the local authority to decide. Wandsworth's current policy requires development viability appraisals on sites

where less than 50% affordable housing is proposed and has identified a need for the provision of affordable housing to be split between 60% low cost rent and 40% intermediate housing.

Question 15

In relation to an affordable housing target should the Council:

- **Continue to seek the highest maximum level of affordable housing provision in the borough subject to viability;**
- **Rely on the draft London Plan's Policy of a minimum of 35% as a threshold and not require viability assessments for schemes that achieve this; or**
- **Agree a lower threshold if justified, for instance due to other infrastructure requirements to ensure the scheme meets the requirements of the local plan?**

Please explain your answer

Question 16

Do you have any other comments on planning for affordable housing in Wandsworth?

Build to Rent

1.3.10 The Private Rented Sector is growing across London and is a key factor in sustaining economic growth. Residents accessing the PRS do so for a number of reasons including the flexibility this tenure offers and as a lifestyle choice or because of a lack of finances, for example, to access home ownership.

1.3.11 Given Wandsworth's location and demographic, there is and will continue to be a very high demand for private rent accommodation particularly from the borough's predominant and growing population of young, professional and mobile residents. The borough has the highest proportion of 25 to 39 year olds of any local authority nationally, 39 per cent compared with 28 per cent in London. Wandsworth also has one of the highest proportions of privately renting households in the United Kingdom at 30 per cent compared to 24 per cent for London as a whole. The overheating of the private rented sector has resulted in high rents displacing lower income households and has in part been caused by prospective first time buyers not being able to afford to move out of the private rented sector.

1.3.12 The acute housing need in London has meant that new forms of housing tenure are being explored and developed, such as institutional investment in private rented housing (Build to Rent). Build to Rent in London has seen significant growth in recent years and is recognised as helping to meet a range of housing needs, providing choice and flexibility for residents. The Government, the

London Plan and Wandsworth Council all support the provision of more high quality private rented homes and this extends to the Build to Rent sector.

1.3.13 The revised NPPF (2018) gives the Build to Rent sector formal policy recognition for the first time. In planning Law, Build to Rent is not distinguished in the C3 Use Class from other forms of residential development despite its particular characteristics. To fall within the definition, and to qualify as Build to Rent, the NPPF sets out that housing must be purpose built and rented out. It can form part of a wider tenure development scheme but should be on the same site or contiguous with the main development. Importantly, tenancy agreements for three years or more should be offered and will typically be professionally managed in single ownership and control. Under the revised NPPF (2018) Build to Rent is defined as a tenure for which local authorities are required to plan.

1.3.14 The draft London Plan also provides its own definition of Build to Rent, setting out additional criteria requiring;

- a minimum threshold of 50 units;
- homes are held as Build to Rent under a covenant for at least 15 years;
- a clawback mechanism is in place that ensures there is no financial incentive to break the covenant;
- all the units are self-contained and let separately;
- there is unified ownership and unified management of the development;

- tenancies should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months;
- the scheme offers rent and service charge certainty for the period of the tenancy;
- providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

1.3.15 The Council will be undertaking an evidenced based assessment of the need for Build to Rent homes in the borough, and set out how Build to Rent and other housing tenures can meet the housing needs of different demographics and social groups setting out appropriate locations for this form of development. The Council's draft housing strategy sets out that Wandsworth will continue to support more structured forms of private rent housing which commit to offering longer assured shorthold tenancy terms, intermediate rent options, a greater degree of certainty over rents and rent increases and a guaranteed high level of management.

Question 17

To encourage greater provision of purpose built private rented schemes/Build to Rent accommodation should Wandsworth:

- **Rely on the draft London Plan's Policy H13 'Build to Rent'; or**

- **Rely on the draft London Plan Policy, but consider a locally based application or area-specific policy if evidence in the updated Wandsworth SHMA suggests that that a local approach will be more effective, i.e. where there is evidence of a potential over supply which could undermine other plan objectives; or**
- **Have a specific Wandsworth policy? If so please suggest what the policy should consider and identify any evidence could support such a policy?**

Question 18

What locations in the borough do you consider as appropriate locations in Wandsworth for Build to Rent developments?

Question 19

Is there anything else the Council should do to support the Build to Rent sector?

Specialised Housing Needs

1.3.16 As well as mainstream market and affordable homes there are a variety of other types of accommodation required to meet the borough's needs. Planning policies need to ensure that improved accommodation and greater choice is available to vulnerable groups, that specific needs are catered for and that policies support the improvement of the residential care and supported housing stock, whilst avoiding the over concentration of similar uses in any one area. The Council will develop evidence (Strategic Housing Market Assessment) to support policy on housing mix and the, type and tenure of homes required for different groups in the community including, but not limited to:

- families with children
- the elderly
- students
- people with disabilities
- service families
- gypsies and travellers
- people who rent their homes
- people wishing to commission or build their own homes

1.3.17 The high cost of housing and housing land in the borough presents a challenge to meet needs close to where the need is identified. The Council will prepare evidence to inform decision making surrounding the formation of new, amendments to, or retention of, existing policy related to specialised housing needs.

1.3.18 The National Health Service and Adult Social Services play an important role in contributing to the Council's evidence base and in identifying the need for specialist and special needs housing. The focus in relation to new supported provision is that it helps meet identified local demand including the demand for affordable forms of supported accommodation. The Council will be preparing new evidence in a revised SHMA to identify future needs.

1.3.19 The draft London Plan sets out that Residential nursing care accommodation should be considered C2 as it provides non-self-contained residential accommodation for people for whom additional personal or nursing care is essential. This is an important element of the suite of accommodation options for older residents and the Council intends to recognise this by preparing evidence to inform policy that will seek to meet the predicted increase in demand for care home beds and to distinguish this type of accommodation from sheltered accommodation and extra care accommodation which the draft London Plan considers as being in Use Class C3.

Question 20

Do you agree that Wandsworth should prepare a policy in line with the Mayor's approach that clearly distinguishes between C2 and C3 uses.

Please provide reasoning for your answer.

Question 21

Are there any particular demands for supported housing which are not being met?

Please provide examples in your answer.

Houses in Multiple Occupation

1.3.20 The London Plan supports Houses in Multiple Occupation (HMOs) as an important part of the London Housing offer, and seeks to protect them where a reasonable standard of accommodation is being achieved. HMOs provide a form of relatively low-cost accommodation appropriate for many people at particular stages of their housing life-cycle. HMOs also reduce pressure on other forms of housing stock. The Council recognises the important role that HMOs play and has a mandatory registration scheme for some forms of HMO which ensures that improvements and repairs can be secured and that relevant quality standards are achieved. The high cost of self-contained homes means that demand for HMOs is likely to continue to grow, and the updated SHMA will inform the extent to which this sector will continue to be protected and supported. These models of shared housing could potentially free up self-contained homes in the borough and offer a greater range and choice of housing.

1.3.21 There is an emerging trend of larger scale purpose built co-living shared accommodation housing schemes elsewhere in London that have sought to cater for an element of the HMO market. As with institutional renting, this could provide benefits in terms of better quality accommodation for tenants and better management, which reduces adverse impacts on neighbours. These models of shared housing could also assist in freeing up self-contained homes and will offer a greater range and choice of housing.

Question 22

Should the Council continue to support Houses of Multiple Occupancy where they meet or have the potential to meet licensing standards?

Housing Mix

1.3.22 In an Inner London borough such as Wandsworth, meeting housing targets, including affordable family housing will require a flexible approach when applying housing mix standards due to the location of available sites. The adopted Local Plan currently takes a balanced approach to ensure that the housing delivered meets the identified needs as set out in the existing SHMA whilst also providing a good standard of accommodation. Due to the high levels of mobility and choice in the market housing sector, including private rented sector housing, and developers' inherent interest in matching supply with demand, a policy on mix of dwelling sizes is unlikely to be justified for market housing, with the exception of controlling the proportion of 1 bedroom/studio accommodation, and a requirement for a minimum proportion of family housing to promote balanced and mixed communities. However, the draft London Plan states that boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.

Existing Policy DMH3 Unit mix in new housing

- a. Planning permission will be granted for proposals for affordable housing developments which demonstrate that a mix of dwelling sizes has been provided taking account of the borough-level indicative proportions detailed below:

Dwelling size	Intermediate	Social/Affordable Rent
1 bedroom 2 person	45%	15%
2 bedrooms	45%	45%
3 bedrooms	10%	30%
4+bedrooms		10% (of which up to 2% should be 5 bedroom)
Family: 3+ bedrooms (total figures for 3&4 bedrooms set out above)	10%	40%

- b. Planning permission for 1 bedroom/studio market accommodation, including new units created in conversions with 10 or more units (gross), will be granted where; 1 person/studio accommodation does not exceed 5% of all

market units, and the overall provision of all 1 bedroom market units including studios does not exceed 20%.

- c. Planning permission will be granted for proposals for market housing where a minimum of 5% of total market units provide family accommodation.
- d. When considering proposals, the dwelling mix will be applied flexibly in light of individual site circumstances, including location, site constraints, sustainable design, the need to provide mixed and balanced communities, viability and the availability of public subsidy.

Question 23

Should the Council continue to seek a proportion of family accommodation units from market units, to meet the needs of larger families to ensure mixed and balanced communities?

Question 24

Should the Council continue to retain the maximum threshold of one bedroom/one person units in new development?

If so, should the current threshold be more or less restrictive?

Housing Quality

1.3.23 Policies controlling housing quality standards in the adopted Local Plan reflect those embedded into the building regulations, including for accessible housing, and those in the London Plan regarding adequate daylight and sunlight, sustainability, and minimum private internal space standards. The London Plan sets out minimum amenity space standards for housing, however the Wandsworth Local Plan has set its own standards of 10 sqm for non-family housing and 15 sqm for family-sized houses, to reflect the urban form and grain of many residential areas, and conservation area character. It is also considered that 15 sqm is the minimum required to provide sufficient family space to enable active play and provide health and well-being benefits. The Council required these standards at the last Local Plan review for 40 sqm and 20 sqm respectively, and considered that the London Plan standard of a minimum 5 sqm, with no distinction between household sizes, is

inappropriate for most of the borough. It is noted that the proposed Modifications (August 2018) to the draft London Plan now propose that boroughs can set their own standards. Current policies do offer some flexibility in the case of conversion of non-residential buildings and for non-family flats, such as the use of communal gardens, balconies, winter gardens and indoor gyms, therefore a locally-based standard can better reflect the urban capacity, density, character and built form but be flexible enough to accommodate development opportunities of commercial conversion.

Question 25

Should the Council:

- **Retain the current standards of a minimum 10 sqm for non-family flats and 15 sqm amenity space for family sized flats?**
- **Propose an alternative standard including distinguishing between family and non-family accommodation?**
- **Propose a minimum distance (15 metres) between windows on adjacent properties for new build, and infill development and for extensions to militate against overlooking and provide a degree of spacing between buildings?**

Please provide reasoning for your answer.

Question 26

Do you have any other comments on housing quality or standards that should be reflected in planning policy?

Residential Extensions

1.3.24 The adopted Local Plan controls the size, scale and design of extensions to avoid adverse impacts. There is a presumption against developing on residential back garden land, and over-large extensions that take up more than 50% of the garden which can impact on meaningful amenity space, character of an area, biodiversity and can increase flood risk.

Question 27

Should the Council's policies further control, or be more permissive towards extensions?

Question 28

Should the Council retain current policy requiring at least 50% of garden space to remain after an extension?

Question 29

Should set a minimum standard for front garden space to remain after extensions? If so what do you think this should be and how could this be justified?

Basements

1.3.25 Basement developments have become common place in many parts of the borough, but are a highly complex and intrusive form of development if not managed carefully. Whilst development under the floor space of a non-listed building does not require planning permission, excavation of light wells and basements requiring major works do require planning permission. Basement development is currently assessed by policies relating to flood risk, the historic environment and residential extensions. Generally high standards of design and mitigation are required for basement proposals in conservation areas and in area of high flood risk. Further detailed guidance and good practice on design, conservation areas, technical and construction issues and advice to neighbours is currently provided in supplementary planning guidance, it remains a controversial form of development however and the draft London Plan expects borough-level policies to be drafted to address the negative impact of large-scale development beneath existing buildings.

Question 30

Should the Council continue to follow the existing approach which requires that no more than half of the rear garden can be developed below ground?

Question 31

Would you support the formation of policy to implement further restrictions on basement development?

1.4 Employment and Economic Development



1.4.1 It is anticipated that the Council will adopt its Local Plan Employment and Industry Document (LPEID) at the Council's Executive Committee in December 2018, following receipt of the Planning Inspector's report which concluded that the plan has been found 'sound' and provides an appropriate basis for the planning of employment and industry in the borough. The LPEID updates those parts of the adopted Local Plan (2016) which cover employment and industry policy.

1.4.2 The emerging LPEID is therefore considered to be an up to date plan based on its evidence and consideration of national and regional policy at the time. Since the preparation of the plan was undertaken there have been changes to national and regional policy which the emerging full review of the Local Plan will need to consider ensuring that the LPEID policies continue to reflect the latest evidence base, NPPF and London Plan.

1.4.3 In recent years there has been increasing pressure on sites allocated for industrial uses to be released for housing development due to the high demand for housing and the difference in land values between uses. The LPEID encourages sustainable economic growth in Wandsworth by taking a balanced approach which seeks to protect established and thriving economic areas as well as promoting redevelopment of sites and premises that have the potential to intensify in order to better meet the needs of a changing local economy, provide housing, and support a thriving cultural and natural character for the area.

1.4.4 Demand for office space is growing and the draft London Plan projects demand for office floorspace in London at between 4.7 million and 6.1 million sqm between 2016 and 2041. The Employment Land and Premises Study (ELPS) (2016) identified future demand for additional office floorspace for the period 2016 to 2030 of between 31,700 and 65,800 sqm for Wandsworth. The LPEID acknowledges the office demand over the Plan period and identifies

suitable locations/types of units for this to meet the demand. For the rest of the borough excluding Nine Elms the capacity of identified sites is around 59,600 to 71,000 sqm of office floorspace.

1.4.5 As set out in the draft London Plan, London can expect to see a significant increase in office based employment growth. Overall, employment growth is expected to be just short of 25,000 sqm each year to 2041, which is an increase of 60% over an above the exiting London Plan (2016) which identifies an annual growth figure of 15,150 sqm.

1.4.6 The borough has 400,600 sqm of office floorspace outside of Nine Elms, the Office space is well occupied with very low vacancy (2.6%). Wandsworth's businesses are overwhelmingly SME's, and significantly a high proportion are micro businesses that employ fewer than 10 people. The percentage of micro-sized firms is notably above the figure for London as a whole.

1.4.7 In 2013 the Government introduced temporary permitted development rights that enabled offices to be converted to housing without having to apply for planning permission. There have been a substantial number of applications to convert offices to residential use in the borough, with the current pipeline of unimplemented prior approval applications resulting in a loss of 28,590 sqm office floorspace. The Council has now implemented an Article 4 Direction covering specific parts of the borough, which will help to control future losses by removing the permitted development rights in locations where the adopted Local Plan policies protect offices from change of use.

1.4.8 The demand for industrial uses and how this relates to floorspace requirements are changing with policies on industrial intensification and colocation being able to accommodate demand, and this is emphasised by the draft London Plan which shows scope for a release of a further 233 hectares of industrial land over the period 2016 to 2041.

1.4.9 In 2015, London had an estimated 6,976 hectares of land in industrial and related uses. Over the period 2001 to 2015, more than 1300 hectares of industrial land was transferred to other uses. This was well in excess of previously established London Plan monitoring benchmarks. Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041.

1.4.10 Currently 141.9 hectares of land is industrial in the borough. This is made up of 78.9 hectares of land used for core industrial uses, which covers use classes B1c, B2 and B8. The remainder is used for wider industrial uses, which includes wholesale markets, waste management, utilities and land for transport. The Wandsworth Employment Land and Premises Study (ELPS 2016) identifies a cautious approach to the release of industrial land in order to meet the total forecast demand for industrial land set out in the ELPS. As Wandsworth is now a 'provide capacity' borough providing this increased demand will be challenging.

1.4.11 The demand for industrial land in Wandsworth set out in the ELPS separates core uses - industry and warehousing – from wider industrial uses, such as waste utilities, land for transport and

wholesale markets. A forecast demand for an additional 8.2 ha or a contraction in demand of 9.5 ha for industrial land in the borough between 2016 and 2030 is only slightly exceeded by the reduction in supply of core industrial uses (10.7ha). There are also opportunities to intensify some industrial sites, and the policies set out in the LPEID, particularly policy EI2 which identifies Economic Use Intensification Areas, will result in increased industrial floorspace that is of a better quality and more suited to modern industrial needs.

1.4.12 To respond to industrial capacity, the draft London Plan goes further than just promoting protectionist policies, focusing in particular on consolidation, intensification, and co-location of uses where possible. Wandsworth has now been categorised as a 'provide capacity' borough as opposed to the previous designation of 'retain capacity', which gives an increased emphasis on safeguarding and providing capacity for industrial uses and is the strongest category for strategic demand for industrial uses.

1.4.13 To meet the evidenced demand for new employment floorspace the new Local Plan will need to accommodate the right type of employment floorspace in the right locations. The NPPF, draft London Plan, and the spatial strategy in the adopted Local Plan all recognise the importance of town centres as the primary location for business. The LPEID follows this approach seeking to focus new office development within town centres, within the Central Activities Zone (CAZ) in Nine Elms and emerging new town centre at Battersea Power Station, and where there is limited capacity on edge of centre

sites. To supplement the potential for new office development in town centres, other appropriate sites in good locations, particularly on the edges of town centre boundaries have also been allocated for the planned intensification of economic uses. The LPEID has identified sites in the north and west parts of the SIL as appropriate for Industrial Business Park uses. These areas have the capacity to increase the amount of industrial floorspace as well as providing increased quantities of commercial floorspace.

1.4.14 The LPEID retains and protects a strategic reservoir of land for industry and waste made up of Strategic Industrial Locations and Locally Significant Industrial Areas. The strategic approach set out in the plan continues to protect the more successful industrial areas and re-designates some sites that are under-utilised for a mix of uses.

1.4.15 Proposals for locating residential or mixed-use schemes are considered contrary to policy in the areas protected for industrial use within the LPEID. The draft London Plan puts emphasis on what opportunities may exist to intensify employment and industrial uses as part of an evidenced based 'plan-led process' of industrial activity intensification and consolidation that might free-up land for the co-location of industrial with residential and other uses. A similar approach is proposed by the draft London Plan for Locally Significant Industrial Sites, while for 'Non-Designated Industrial Sites', protection of industrial uses is emphasised subject to specific criteria being met. Whilst the LPEID is a recent document the full review of the Local Plan will need to consider the revised

requirements of the draft London Plan particularly in regard to industrial demand and assessment of capacity to accommodate a range of industrial uses.

1.4.16 A key aim of the National Planning Policy Framework (NPPF) is the building of a strong, competitive economy as set out in more detailed requirements in paragraph 81 in particular. It requires that local plans provide a clear economic vision and strategy which ensures that anticipated business needs are met for existing and emerging business sectors and that the policies are flexible enough to respond to changes in economic circumstances. The NPPF also states that key areas for economic regeneration, infrastructure provision and environmental enhancement should also be identified in local plans and that allocations should be reviewed to ensure that the prospects of such sites being used for employment purposes remain.

1.4.17 The borough has a limited supply of land and premises in economic use, accordingly the LPEID has sought to provide a balanced approach. The LPEID has set out the approach in Policy EI3 which requires no net loss of office and industrial in mixed use schemes. The LPEID continues to encourage new office floorspace in town centres and the emerging town centre at Battersea Power station, and within the Nine Elms Central Activities Zone and (at a smaller scale) in local centres, and specific sites in edge of centre locations. The designation of parts of the Stewart's Road SIL as suitable for Industrial Business Park uses will also provide the opportunity for this area to capitalise on the increased demand for

business floorspace in the wider Nine Elms and Battersea area. In order to protect employment uses the LPEID also sets out detailed requirements for establishing redundancy of employment premises.

Question 32

What locations do you consider appropriate for industrial uses in Wandsworth?

Question 33

What types of employment do you think have the potential to grow in Wandsworth over the next 15 years and what conditions are needed to generate and retain jobs locally?

Question 34

What else should the Local Plan consider to help the SME sector and start up businesses?

Affordable Workspace

1.4.18 Average rental rates for both offices and industrial uses have increased significantly in recent years in Wandsworth, and for many businesses the affordability of employment premises is a significant concern. This reflects a constraint on supply in the face of growing demand and the Government's removal of the need for planning permission for change of use of office and small scale light industrial into dwellings has meant a further significant loss of employment space in the borough.

1.4.19 The current local plan policy seeks to ensure that a range of businesses are able to afford to operate from the borough and that the premises they use provide the flexibility that businesses need in order to flourish. This requires all development providing economic floor space to contribute to the provision of affordable, flexible and/or managed workspace.

Question 35

Is the current policy on affordable workspace sufficient to provide affordable workspace that can meet the needs of local businesses at all stages in their development?

Question 36

Should the Local Plan set out site specific locations where affordable workspace should be provided or adopt a more general policy approach?



Town Centres

1.4.20 The boroughs five existing town centres (Balham, Clapham Junction, Putney, Tooting and Wandsworth) are the focus for shopping leisure and offices in Wandsworth. The town centres are supported by a network of 9 smaller local centres and 23 Important Local Parades (ILPs) that typically provide for day to day needs, and some small-scale complementary uses such as cafés, hairdressers and dry cleaners. New development at Nine Elms is bringing forward

a new neighbourhood and an emerging new town centre at Battersea Power Station with new shops, businesses and homes which are likely to be occupied within the lifetime of the new Local Plan.

1.4.21 Wandsworth's town centres, and smaller local centres and Important Local Parades fit into a London-wide network of town centres, ranging from internationally important centres to local neighbourhood centres, and unlike many parts of the UK, there is considerable interdependency between these centres due to their different roles, range of goods and services, and good accessibility and proximity to where people live or work. This means that residents and workers in London typically visit a range of centres.

1.4.22 The revised town centres policies will need to address significant challenges - such as changing consumer preferences leading to structural changes in the retail sector and the online economy; promote resilience and diversification in the wider town centre economy, and achieve ambitious housing targets in high densities whilst avoiding harm to conservation areas, increasing traffic congestion and air pollution. Updated policies will need to identify and maximise opportunities for growth and regeneration in an improved public realm, reflecting existing regeneration initiatives whilst building on the local distinctiveness between the town centres.

Town Centre Uses

1.4.23 Town centre uses are defined by national policy and include shops bars and restaurants, offices, hotels, cinemas, nightclubs and other evening economy uses. The NPPF sets out that

local plans need to identify town centres which are the locations for town centre uses to be located. Town centres are generally the most appropriate locations for large-scale economic growth. Within the town centres, local plans must also identify and protect primary shopping frontages where shops and complementary activities such as banks, cafes bars and restaurants are to be concentrated. The draft London Plan provides strategic direction for approaches to growth, resilience, densification and maximising new housing opportunities in town centres. The London Plan sets out a hierarchy of town centres throughout London and provides London-wide context and policy direction for regeneration, the office market, and the night time and visitor economy for example. It also requires that boroughs undertake regular town centre health checks and promotes development of town centre strategies in order to provide adaptability and resilience building on local distinctiveness.

1.4.24 Wandsworth's five town centres: Balham, Clapham Junction, Putney, Tooting and Wandsworth - and the emerging new town centre at Battersea Power Station - are the appropriate locations for a wide range of large-scale town centre uses. In addition to the town and local centres and the Important Local Parades, the adopted Local Plan sets out Focal Points of Activity (See map xx) and individual sites currently identified in the individual site allocations in the adopted Site Specific Allocation Document (SSAD), which are smaller in scale and have an intended role in providing sustainable development by providing local facilities in new housing

developments. The Councils' existing Local Plan Industry and Employment Document (LPEID) also identifies additional locations appropriate for employment uses and mixed use development.

Out of Centre Development

1.4.25 The NPPF and draft London Plan expect a 'town centre first' approach to locating proposals for new town centre uses. The NPPF requires that local plans set out evidence-based strategic policies to make sufficient provision for employment, retail, leisure and other commercial development looking ahead over a 10 year period, and support town centres by taking a positive approach to their growth, management and adaptation.

1.4.26 Wandsworth has been successful in attracting redevelopment and regeneration into mixed use environments; however, the Council need to consider and evidence whether the locations for town centre uses, even at small scale, outside of the defined centres such as the Focal Points of Activity and/or in mixed use developments are still appropriate or require a more refined policy approach. Development monitoring information has shown an increase of planning permissions granted for town centre uses outside of town centre locations, which may be attributed to a range of factors including the cumulative effect of achieving mixed use development outside of defined town centres. Whilst this type of small-scale development is compliant with current policy, there is a need to review the approach to ensure that the town centres remain the focus for town centres uses. This review will also need to identify how successful place-making and public realm improvements can

be achieved to enhance the town centres and smaller centres. Consideration will also need to be given to how the new Local Plan policies could best achieve a diversity of uses in out of centre development.

1.4.27 To support policies requiring a 'town centre first' approach to new town centre uses, the NPPF requires a 'sequential test' to be undertaken for planning applications seeking town centre uses outside of identified centres or other identified appropriate locations to be supported by evidence that demonstrates that there are no suitable sites within town centres, or on the edge of town centres. The preparation of an updated Retail Needs Assessment will help identify how local plan policies can best apply this test to local circumstances taking account of future need and capacity.

1.4.28 The spatial distribution of retail and related growth projections between each of the borough's town centres and the emerging new town centre at Battersea Power Station will be informed by the updated Retail Needs Assessment.

1.4.29 The NPPF has now removed the requirement to assess the impact on town centres from large-scale out-of-centre office development. The borough has been successful in attracting new offices and directing them to town centres, Nine Elms and other appropriate locations identified in the existing Local Plan. Concentrating offices in town centres and other plan-led identified locations can provide a daytime market from workers for shops and related services in areas which benefit from high public transport accessibility. New large-scale out of centre office developments may

reduce the role of town centres and range of uses provided there, and preclude regeneration initiatives as well as increasing the need to travel. It is appropriate therefore to consider whether a local policy threshold should be set, above which the impact of large scale out of centre office development must be assessed to protect and retain the town centres and Nine Elms/CAZ and appropriate locations in the Local Plan as the focus for new large-scale office growth. Evidence in the Retail Needs Assessment will be used to explore suitable policy approaches.

Question 37

Is the approach to out-of-centre development, including seeking mixed uses on redevelopment sites such as the riverside and Focal Points of Activity, still appropriate in light of new national policy which supports a 'town centre first approach' and identifies a need to ensure resilience?

Question 38

Are the sites defined as suitable for new office development in the adopted Core Strategy (Policy PL8d) and LPEID (policy EI2) still relevant, and should they be reconsidered in light of a holistic review of the town centre first objective and resilience?

Town Centre Growth and Resilience

1.4.30 The NPPF promotes town centre diversification acknowledging the nature of the retail sector and, as a consequence it recognises that diversification is key to the long-term vitality and viability of town centres. The draft London Plan also expects local plan policies for town centres to embrace adaptability and resilience. Accordingly, planning policies should clarify 'the range of uses permitted in such locations, as part of a positive strategy for the future of each centre'. The Council also needs to meet challenging new housing targets and the London Plan expects town centres to deliver some of this need by building at higher densities. There is also strong demand for new offices and shared workspaces which are best located in town centres. The London Plan identifies that the night time economy and the visitor economy are potential growth sectors in Wandsworth and are important in achieving a diverse offer and increasing resilience. Wandsworth also has a number of further education and university campuses within or near to town and local centres which provide footfall and a daytime market for town centre shops and services adding to the vitality and viability of centres.

1.4.31 Town centres are constantly evolving and adapting and planning policy needs to support this change. Current issues include uncertainty in the retail sector and in certain sectors of the restaurant trade. These could be attributed to a range of factors including changing consumer preferences, the switch towards online shopping, obsolete business models, increased costs, high business rates and

utilities, short leases, and alternative use values. At the same time there is an evidenced unmet demand for new office and business space. The Council undertook 'visioning exercises' in its town centres in 2014 to establish individual branding to establish the town centres more clearly as destinations. It has since promoted Business Improvement Districts (BIDs) as proffered sustainable, business led models and BIDs are further developing the distinctive Identity and unique selling points of the town centres. The individual branding and unique selling points of the town centres, combined with the Business Improvement District business plans, and other corporate town centre strategies will be reflected in updated policies for the town centres in order that the plan supports this approach.

1.4.32 Promoting growth should be complemented by a policy approach that manages impacts such as noise complaints arising from the juxtaposition of new residential uses and new economic uses such as nightclubs and bars, and 24 hour business uses, in particular putting in place policy solutions and mitigation requirements, for example to avoid noise complaints from residential uses.

Question 39

How could a broader range of town centre uses with a longer economically active day be achieved alongside new homes?

Digital Connectivity

1.4.33 The Council and many businesses are moving towards an online-first provision of services, and superfast broadband is being delivered to the Council housing estates promoting wider online access and reducing inequalities. Digital connectivity, including Wi-Fi and mobile data access, is becoming increasingly important to Businesses in town centres. Good Wireless internet access for town centre visitors, whether through Wi-Fi or fast mobile connections, also encourages longer dwell time in the town centres, increasing expenditure in local shops and services. The Council is keen to support improvements in digital infrastructure, whilst ensuring that the impact on streetscape, conservation areas and other heritage assets is minimal.

Question 40

How can the Local Plan do more to support the borough's town centres in relation to accessibility and Information Technology needs, e.g. ensuring sufficient WIFI infrastructure and promoting the next generation of 5G infrastructure?

Shopping and Protected Frontages

1.4.34 The NPPF requires local plans to identify the primary shopping areas where by shops and complementary uses such as food and drink uses, will be concentrated. In Wandsworth, these protected areas are defined as Core, Secondary and Other frontages in the town and local centres, and the important Local Parades. The adopted local plan defines their extent and range and mix of uses for each type of frontage. The Core and Secondary shopping frontages require a minimum percentage of shops (A1) use to be retained alongside complementary uses such as cafes, restaurants bars and pubs. Other frontages offer the greatest degree of flexibility in uses providing complementary uses to support the core shopping area and additional capacity for retail shops. Wandsworth protected parades have low vacancy rates compared to the rest of London and the UK.

1.4.35 Both the updated Retail Needs Assessment and updated evidence on vacancies and proportion of shop (A1) uses over time in the biennial Retail Survey reports will be used to identify where and how the boundaries of the protected frontages, range of uses and/or proportion of A1 (shop) uses may need to change to reflect current and projected demand and offer some resilience to changing shopping trends.

Question 41

The adopted Local Plan require a minimum proportion of retail premises within Core frontages (70%) and Secondary frontages (50%) to be retained. Should Wandsworth:

- **Maintain current policies;**
- **Relax the thresholds to allow wider range of uses;**
or
- **Remove all thresholds and let the market decide the mix of uses?**

Please explain your choice any alternative approach or threshold you consider to be appropriate.

1.4.36 The Council has received applications that seek the conversion of ground floor commercial floorspace in protected core and secondary shopping frontages. Current policy provides a unit based protection for the shop frontage, ensuring it as kept in a retail use. However, it offers no protection for the overall loss of ground floor commercial floorspace. Conversions that include a reduction or alteration in the quantum or layout of commercial floorspace can lead to a reduction in the flexibility of the remaining commercial floorspace as the unit becomes too small, awkward or difficult to service for many types of occupier. Over time the erosion of the

floorspace could result in vacant units. Uses that may require larger floor space include restaurants, cafés or community uses for example, could also be precluded. The Council will be preparing evidence to explore the issue further.

Question 42

Should the existing boundaries of the protected parades be changed? Is so where and why?

Question 43

What else do you think the Local Plan should consider to enhance Town Centres, local centres and local parades?

1.4.37 In addition to planning for growth and promoting town centres, the NPPF advocates achieving sustainable neighbourhoods, it is important to ensure shops and services that provide for day-to-day shopping needs (sometimes called 'top up shopping') and key local services such as pharmacies and post offices are protected or provided within walking distance from resident's homes.

Question 44

Do you have local shopping facilities or local services within walking distance for home to meet day-to-day needs?

If not, what is missing and where do you think it should be located?

Night Time Economy

1.4.38 Wandsworth is home to a wide variety of night-time economic activity, including eating, drinking, entertainment and shopping, much of this activity is centred around the Town Centres. Together these support and strengthen town centres economic standing and their attraction beyond the function as a day-time workplace and shopping centre. There are also other significant economic and service activities at night in the borough that are not directly associated with traditional town centre night-time uses such as at New Covent Garden Market, the largest wholesale fruit, vegetable, and flower market in the United Kingdom.

1.4.39 Putney, Wandsworth and Tooting are recognised in the draft London Plan as important areas of more than local importance for London's night-time economy and Clapham Junction is recognised as an area of regional or sub-regional importance. The Council actively protects and supports evening and night-time cultural venues

such as pubs, theatres, cinemas, music and other arts venues. The draft London Plan introduces into policy the agent of change principle which places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new noise sensitive development. This means that new development should be designed to protect new occupiers from noise and other impacts and to ensure that established noise and other nuisance generating uses remain viable and can continue to grow without unreasonable restrictions being placed on them.

Question 45

How can the Council best continue to support night-time economic activity in the borough?

Question 46

How might the Local Plan seek to manage an increase in the range of uses in the town centres, including residential uses, and the needs of the night time economy?

Arts Culture and Entertainment

1.4.40 Wandsworth has a rich cultural offer where Arts Culture and Entertainment uses (ACE) contribute towards place making, education and health. ACE uses also contribute to wider Town Centre resilience by broadening the economic base of the borough's town centres.

1.4.41 As one of the biggest regeneration areas in Europe, the Nine Elms area has embedded culture into its development strategy. The Nine Elms Cultural Strategy has now been produced, more work is needed to establish the conditions for culture to flourish in this emerging new quarter of central London. Further evidence on Arts and Culture need are required to inform the protection of, growth and spatial distribution of this sector in the remainder of the borough.

Question 47

What Arts, Culture and Entertainment activities and facilities in the borough are important to you, and why?

Question 48

What do you consider are the constraints and opportunities for Arts, Culture and Entertainment uses in the borough?

Question 49

Do you have any comments on arts, culture and entertainment in the borough?

Pubs

1.4.42 Pubs are a unique and intrinsic part of Wandsworth life, reflecting a long history of brewing in the borough and many premises are of historical or architectural merit. They are important to a community's sense of place and can provide an important community hub for people to meet, as well providing food and entertainment uses. The Council recognises the social environmental and economic roles of pubs and bars and the contribution they make to the built environment. In response to a significant loss of historic pubs resulting from both cultural changes and the former permitted change of use to residential accommodation, the Council put in place an Article 4 Direction now in place to remove these permitted

development rights. This has meant allowed for the implementation of policies in both the London Plan and current Local Plan which support the retention of pubs to take hold. The Council has produced a Town Centre Uses SPD which provides detailed guidance in the form of criteria for assessing the historic and architectural significance and community function of pubs and bars.

Question 50

Do you have any comments on the protection of pubs in the borough?

Visitor Accommodation

1.4.43 The evidence supporting the draft London Plan identifies a projected need for 58,000 bedrooms of serviced accommodation across London by 2041. In addition to local demand from visitors for business or family reasons, the draft London Plan promotes tourism across the capital and the extension of attractions into well-connected parts of London complemented by supporting infrastructure including new visitor accommodation. The borough's town centres and Nine Elms have potential to accommodate growth in the visitor economy bringing benefits to residents and visitors of the borough.

Question 51

What do you think are the main issues, constraints and opportunities for visitor accommodation in the borough?

Question 52

Should there be a Wandsworth-specific policy on hotels and visitor accommodation, if so what should it contain?

1.4.44 Since 2015, residential properties in London are permitted to be let out on a short-term basis for a maximum of 90 nights per calendar year without this being considered a material change of use for which planning permission is required. This is sometimes achieved through the gig economy facilitated by a number of easily accessible online or app based services. Local evidence is required to identify the current extent of short term letting in Wandsworth and to ensure that the impact of projected growth does not conflict with other town centre uses, or result in a reduction in the housing supply from residential use to short-stay accommodation.

Question 53

Q56. Do you have any comments on short term letting in the borough?

1.5 Transport



1.5.1 Transport plays a pivotal role in the lives of all Londoners. Ensuring the on-going functioning of the transport network as the city continues to grow requires careful planning and consideration at the local and strategic levels.

1.5.2 The Mayor's Transport Strategy sets the strategic direction for transport across London. The strategy includes a headline target for 80% of all journeys in London to be undertaken by walking, cycling or public transport by 2041. In Wandsworth, this is likely to require a 10% modal shift away from cars. Achieving this target is reliant on on-going investment to ensure there are attractive public transport and cycling networks and public realm improvements that will make it easier and more enjoyable to walk.

1.5.3 The draft London Plan will shape how transport is managed at new developments. This includes the provision of car parking and cycle parking, a detailed examination of how deliveries and servicing will operate and how the trips generated at development sites will impact on the local transport network.

1.5.4 The Local Plan details how the borough will support the implementation of the London Plan. In parallel, the borough is currently developing its third Local Implementation Plan (LIP). The LIP sets out how delivery of the Mayor's Transport Strategy will be supported at a local level, including a long-term delivery plan of transport improvements through to 2041.

Road Network

1.5.5 There are approximately 440 kilometres of roads in the borough. Some 33.5 kilometres of highway are designated as part of the Transport for London Road Network (TLRN) and are subject

to Red Route controls, including the A205 (South Circular Road), A3/A3205 and A24. The council is the Highway Authority for all other public roads within the borough.

1.5.6 Congestion is regular issue on many local roads; traffic also contributes to poor air quality and causes delays to bus services. Faced with a growing city, there is little opportunity to create additional road space. The impetus instead is to shift trips to more space efficient modes, ensuring there is still capacity on the roads for essential trips that cannot be undertaken by other means.

1.5.7 The new Mayor's Transport Strategy shifts the focus away from the road network as being dedicated to cars and other motor vehicles, and instead supports the idea of 'streets' focused not only on the movement of people by different modes, but as places to be and enjoy.

1.5.8 Major transport schemes are now assessed against the Healthy Streets indicators, which focus on putting human health and experience at the heart of planning the city.

1.5.9 This shift in policy provides the opportunity to reconsider how roads and streets are used, and ensure that the balance between different priorities is correct for different times and locations. It also reinforces the need for new developments to be well served by public transport and to encourage and enable access to and from development sites on foot and by bicycle.

Question 54

Is the current balance of space between cars, cyclists and other road users about right? If not, what should the Plan do differently? Should there be different solutions for different times of the day or week?

Question 55

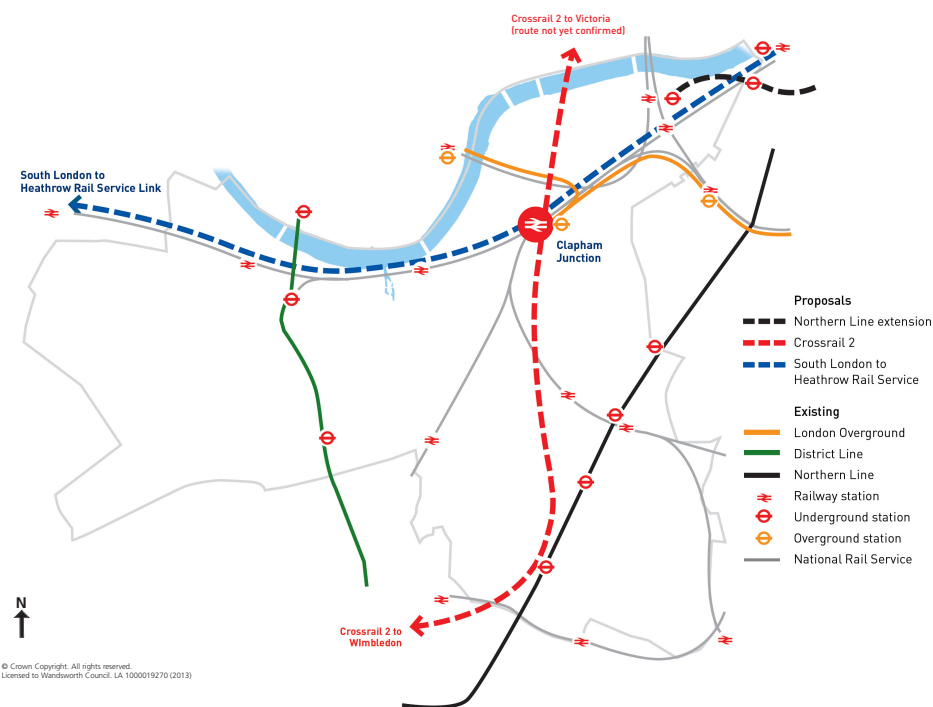
Do you support a shift away from car use to people using public transport, walking or cycling?

Public Transport

1.5.10 Wandsworth has a generally good public transport network but some areas are relatively remote from bus and train services. Much of the public transport network is controlled by other agencies, e.g. TfL, train operators and Network Rail.

1.5.11 The borough is served by national rail links to Victoria and Waterloo through Clapham Junction, the busiest railway station in the country. London Underground services are provided by the Northern and District lines, and the Overground runs via Clapham Junction.

Map 4 Rail Transport Network Including Proposals (Core Strategy 2016)



1.5.12 Crowding is a common issue on public transport services within the borough. Population and employment growth, and the Mayor’s ambitions to reduce car use, will put increased pressure on the network.

1.5.13 The Northern Line extension, serving Nine Elms and Battersea Power Station, is scheduled to open in 2020, thereby improving rail links in the north east of the borough. In the longer term, Crossrail 2 has the potential to ease crowding on some local routes, with the Council’s preferred option being for new stations at Clapham Junction and Tooting. However these improvements will only cater for some journeys. Across the borough, bus and rail services will need to offer more capacity and better reliability. Along the River Thames, there is also scope for enhancements to river bus services to serve the growing population in riverside developments.

Question 56

Do you support the Council’s aspirations for Crossrail 2 including stations at Clapham Junction and Tooting Broadway?

Question 57

What other improvements to public transport do you think the Council should be considering?

Active-Travel

1.5.14 Walking and cycling help to reduce pressure on the road network and on public transport, as well as having established health benefits.

1.5.15 Walking is important for making local trips, and as part of longer public transport journeys. Creating an environment conducive to walking is a key tenet of the Healthy Streets Approach, and includes ensuring that roads are easy to cross and that the air is clean.

1.5.16 The Council has recently reviewed the cycle network in Wandsworth as part of our Cycling Strategy and improvements to routes are being developed through the LIP and TfL's Quietways programme of signed routes using less-busy streets. Safety remains the most cited barrier to cycling, and creating routes that minimise interactions with vehicle traffic can help encourage more people to cycle.

Question 58

How can the Local Plan better support more trips being made by walking and cycling?

Freight, Deliveries and Servicing

1.5.17 The number of freight vehicles on local roads is rising. London's continued success relies on safe, reliable, sustainable and efficient goods delivery and servicing. Our streets must be able to accommodate these trips while minimising the impact on congestion. The key challenge is finding the best way to manage freight traffic while improving air quality and maintaining street space.

1.5.18 The number of freight vehicles, particularly vans, is expected to continue to increase. Many local areas are taking an increasingly pro-active approach to managing freight traffic. Measures can include examining the use of kerbside loading bays, working with businesses to influence the timing and frequency of trips, and the introduction of delivery collection points.

1.5.19 Taking deliveries and servicing into account at design stage can have long-term benefits for new developments. Even buildings with no on-site car parking will have deliveries and need regular servicing. Ensuring there is provision to accommodate these trips will reduce the impact on the local road network.

Question 59

Do you support the introduction of changing regulations for kerbside use? If so, do you support providing more space for delivery and servicing vehicles?

Question 60

Do you support more deliveries taking place outside peak hours, including at night, assuming precautions are taken to minimise noise?

Question 61

Would you support greater use of delivery collection points (where you can have parcels delivered and pick them up at your leisure), in order to reduce the number of private deliveries made to homes and businesses?

Question 62

How should new developments best incorporate the need for delivery and servicing vehicles?

Car Parking

1.5.20 Research shows that private cars are parked for 96% of the time. In many parts of Wandsworth, this means vehicles being parked on the street (Perspective on Parking Policy, RAC Foundation 2012). Apart from detracting from the street scene, this restricts opportunities for other kerbside uses such as bus or cycle lanes and limits pedestrian activity e.g. crossing movements.

1.5.21 Shared services such as car clubs, which may or may not have dedicated parking bays, can reduce reliance on private car ownership and thereby free up space for other uses, and make it easier to park for those who need to continue using a car.

1.5.22 Reduced levels of car parking at new developments, including car-free housing in areas with the best public transport links, can help reduce car dependency and the number of short trips made by car as default simply because the option is available. However care must be taken to ensure that developments do not result in overspill parking onto surrounding streets. This is easier to manage in Controlled Parking Zones where permits are required to park. Space for disabled parking will still need to be provided.

Question 63

Do you support the introduction of changing regulations for kerbside use? If so, do you support a reduction in parking space for private vehicles?

Question 64

Do you support more developments being car-free or 'car-lite' (i.e. with very low provision of car parking)?

Taxis and Private Hire

1.5.23 The taxi and private hire industries have changed markedly in recent years. The number of private hire licenses has almost doubled, with 110,000 private hire drivers and more than 80,000 private hire vehicles currently operating in London.

1.5.24 While both taxis and private hire vehicles are increasingly becoming cleaner and greener, their presence can have a significant impact on congestion. There are limited numbers of taxi ranks and few locations for private hire drivers to park and turn off their vehicles between journeys.

1.5.25 Increased competition for kerbside space between car parking, deliveries and servicing and taxis and private hire can result in vehicles stopping in the roadway, causing further congestion and potential conflicts with cyclists and other vulnerable road users.

1.5.26 The option of dynamic kerbsides, where space can be used for different functions at different times of the day, could help to relieve congestion by offering dedicated locations for pick-ups and drop-offs for taxis and private hire trips, as well as dedicated waiting areas for vehicles.

Question 65

Do you support the introduction of changing regulations for kerbside use? If so, do you support providing more space for taxi and/or private hire vehicles?

Question 66

What other policies should we consider relating to taxis and private hire vehicles?

Emissions from Transport

1.5.27 Transport is a major contributor to local levels of harmful pollution, particularly particulate matter (e.g. PM10 and PM2.5) and oxides of nitrogen (e.g. NO2). It is also a generator of CO2 which contributes to climate change. The Mayor is attempting to reduce transport emissions through a range of measures including the Ultra Low Emission Zone (ULEZ), which will introduce a new charge for polluting vehicles within the South and North Circular Roads from October 2021. Electric vehicles, which offer no tailpipe emissions, are among those vehicles meeting the ULEZ standards, and their encouragement can play a role in reducing overall transport emissions.

Question 67

Do you support the introduction of more charging infrastructure to enable people to switch to electric vehicles? If so, do you think this should be delivered on street, in new developments, or a mixture of both?

New Methods of Transport

1.5.28 Technology is enabling new methods of transport to be developed. These include automated vehicles (with varying degrees of autonomy). Driverless cars, automated freight buggies and delivery drones are all mooted as possible future options for personal

mobility and deliveries. In the right circumstances, these could offer opportunities for cleaner, safer journeys. However there are many questions that remain to be answered about the real-world impacts of these new technologies, and whether enabling their widespread use could adversely affect other aspects of the transport system. For example, measures to enable driverless cars or freight could require some restrictions on pedestrian and cyclist movement, while door-to-door driverless taxis could affect the sustainability of some public transport services.

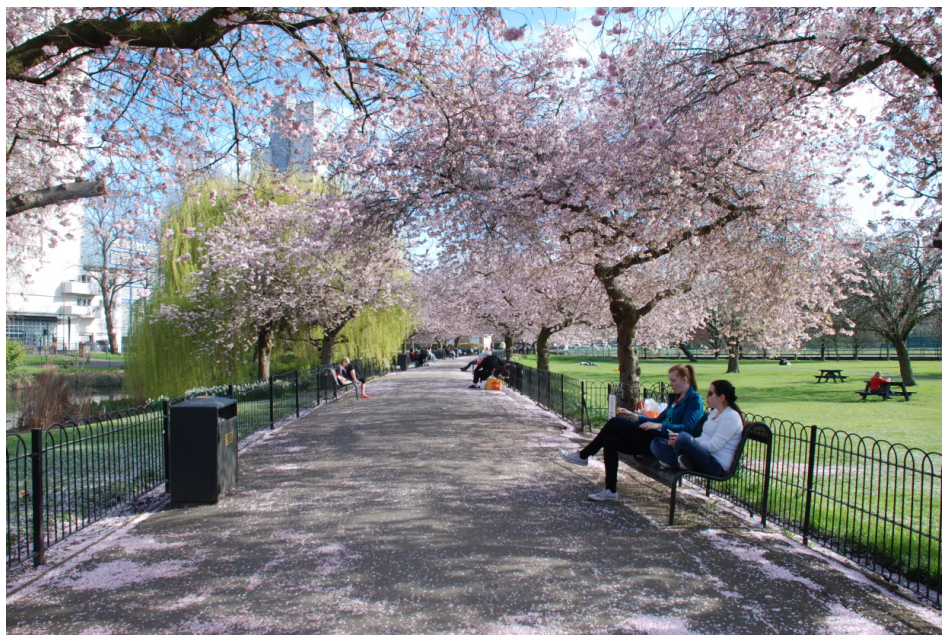
Question 68

How should new transport technologies such as these be considered?

Question 69

Are there any other transport issues the Local Plan should consider?

1.6 Open Space and the Environment



1.6.1 The Key issues that the borough faces in terms of Open Space Biodiversity and the Environment are:

- Climate change is a global issue with impacts that are felt most acutely at the local level in terms of more extreme weather, including hotter summers and periods of heavy rainfall.
- Protecting and enhancing open spaces and the natural environment, seeking the protection and enhancement of habitat and biodiversity.

- Managing waste more efficiently - reduce; reuse; recycle and recover energy from waste to landfill, in accordance with strategic targets.
- Promoting low carbon development through increased energy efficiency and the proportion of energy generated locally and from renewable sources. Encouraging the use of sustainable building techniques and sustainable water resources.
- Protecting people from risks to their health and safety, and damage to their amenity.
- Reducing the environmental impact of transport without reducing access.
- Protecting and enhancing the River Thames and its tributaries.
- Managing the consequences and reduce the risk of flooding.
- Increased pressures on existing open space and sports facilities due to population growth.

Open Space

1.6.2 Open space is all open space of public value, including areas of water, which offer important opportunities for sport and recreation and can act as a visual amenity or is of historical importance.

1.6.3 The Council boasts 32 parks and is an inner city borough where a quarter of the land areas is open space, including large areas of heath and common land, and approximately 8km of Thames riverside. Smaller areas are of local importance for informal play and recreation and are often within walking distance from resident's homes therefore contributing to sustainable communities. Allotment

gardens, burial grounds and playing fields also account for a significant proportion of the open space in the borough. There are also many sites of biodiversity importance in the borough including internationally important sites such as part of Putney Heath and Wimbledon Common. Wandsworth's larger open spaces are used by Londoners from a wide catchment.

1.6.4 Open spaces or green infrastructure are important for health and wellbeing, particularly in a borough where many homes do not have access to a private garden, and schools may not have their own playing fields. The Council recognises the contribution green infrastructure can play in promoting mental and physical health and wellbeing; adapting to the impacts of climate change and the urban heat-island effect; improving air and water quality; encouraging walking and cycling; supporting landscape and heritage conservation learning about the environment; supporting food growing and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.

1.6.5 A key challenge is to accommodate a growing population, improve public health and health outcomes, and ensuring access to good open space, sport and outdoor recreation. Currently there is a significant spatial variation in the distribution of open spaces within the borough and at the local level, small parts of the borough are deficient in smaller open spaces (known as local parks), meaning that there are no spaces providing for informal play/recreation or sitting out within walking distance (400m) from home. There is need to

prepare an up-to-date assessment of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments, along with consultation responses will be used to determine what open space, sport and recreational provision is needed, which the new local plan should then seek to accommodate.

1.6.6 The NPPF requires that existing open space, sports and recreational buildings and land, including playing fields must not be built on. It is important that in meeting housing needs, this must be complimented with accessible open spaces that reflect current and future needs and support communities' health, social and cultural well-being; retaining existing open spaces and maximising the opportunities to address these deficiencies. The main opportunity for creating new open space is on new development sites including opportunities to provide public access on private open spaces. Whilst the opportunities for creating new larger open space are limited, better use of existing facilities may also contribute to meeting needs. In line with National Policy in the NPPF, the new local plan will need to be evidence by a new open space study to assess the borough supply and demand, identify catchment of open space users, and to recommend an open space and playing field strategy for the next 15 years. The strategy will also need to reflect the diminishing resources of local councils to invest in the maintenance and upkeep of open spaces, and greater use of fee-paying events or activities, or alternative management or maintenance regimes may need to be considered in future.

Question 70

Are there any additional areas of open space which should be identified which are not currently?

Question 71

Are there any open spaces that you are aware of that could be improved, what measures could the Local Plan take to secure improvements?

Question 72

Are there any parts of designated open space that do not properly serve open space functions and could be improved or even re-designated for other uses?

Question 73

There is a long waiting list for allotments. Should the Council seek to enable alternative food growing spaces? Please explain your answer, and detail suitable locations for new facilities.

Question 74

In relation to new development, how can the management and maintenance of new parks and open spaces be best managed so as to ensure that no ongoing financial burden is placed on the local Council or the local community?

Flood Risk

1.6.7 Significant areas of the borough are at risk of flooding and recent events have demonstrated the damage flooding can cause to homes and communities located in flood prone areas. There is already significant national and local guidance in place for flood risk (in the form of the NPPF and Environment Agency). There is also local guidance provided by the Lead Local Flood Authorities (LLFAs) Wandsworth is responsible.

1.6.8 National Guidance states that development in areas at risk of flooding should be avoided, which can be ensured by directing development to lower risk areas. The main source of flooding, in Wandsworth is identified as fluvial flooding, the main sources being the River Thames, River Wandle and Beverley Brook.

1.6.9 The draft NPPF 2018 states that to meet the challenge of climate change, flooding plans should have regard to the cumulative impacts of flood risk, rather than just looking at the flood risk impact of individual development sites.

1.6.10 National guidance requires us to adopt proactive strategies to reduce and adapt to climate change, taking full account of flood risk, water supply and demand considerations. Development in vulnerable areas needs to be given careful consideration to ensure that risks are managed and minimised.

1.6.11 The NPPF requires Local Plans to be supported by a Strategic Flood Risk Assessment (SFRA) study to inform policies for flood risk management.

1.6.12 The Wandsworth SFRA was completed prior to the release of the updated Environment Agency climate change allowances. Consequently, there is the potential that sites designated within Wandsworth Site Allocations, which previously passed on flood risk grounds, may no longer be considered suitable under the new regime.

Question 75

Do you support the proposed approach to controlling flood risk?

Question 76

How can the Local Plan have regard to the cumulative impact of flooding should this take the form of stricter controls on minor extensions due to the potential cumulative impacts on for example fluvial flood storage or on surface water.

Question 77

Should there be stricter requirements on the management of surface water, because of the potential cumulative impact of multiple small scale developments located in a small area within an urban catchment.

Question 78

Should the update of the SFRA take account of new modelling and mapping requirement as well as national policy, is there anything else that needs to be considered?

Air Quality

1.6.13 Air pollution affects everyone, a variety of air pollutants have harmful effects on human health and the environment. In most areas, these pollutants are principally the products of combustion from space heating, power generation or from motor vehicle traffic. Pollutants from these sources may not only prove a problem in the immediate vicinity of these sources but can travel long distances. People living in deprived areas are also more affected by poor air quality, partly because these areas are often near busy roads or major construction areas. The worst air quality is found along the main vehicle routes, with poor air quality found in the areas between these routes. An Air Quality Management Area (AQMA) for the whole of the borough was declared in 2001 for exceedances of the nitrogen dioxide (NO₂) annual mean air quality objective limit and the daily mean for particulate matter (PM₁₀). Planning developments can have an impact on air quality, through building design, construction, energy, heating and cooling systems and vehicle movements associated with the construction and

operational phase. An Air Quality Action Plan (AQAP) was put in place in 2016 detailing the actions the Council would be taking to reduce pollutant concentrations to below the objective limits. The Air Quality Action Plan sets out how to meet local air pollution goals and objectives, through a range of measures aimed at reducing emissions from existing buildings, new developments and from transport including environmental advice for businesses; improved energy efficiency in buildings; promoting cleaner and more economical road vehicles; and promoting the use of less polluting modes of transport.

1.6.14 Air quality is the most pressing environmental threat to the future health of London. The Mayor through the Environmental Strategy wants to dramatically reduce the number of Londoners whose lives are blighted by poor air quality.

1.6.15 As the NPPF states, 'Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local Air Quality Action Plan. Therefore, The Council will encourage proposals and design solutions which improve air quality.

1.6.16 The evidence on air quality shows that new Local Plan policies will need to ensure that development proposals address the potential impact on air quality in isolation as well as the combined cumulative impact with neighbouring developments. Any air quality assessment and low emission strategy must set out the potential impact of the development on local air quality. Given the on-going

exceedances of air pollutants throughout the borough, opportunities need to be taken to improve air quality in accordance with the Council's Local Air Quality Action Plan.

1.6.17 The draft London Plan proposes that major developments are air quality positive. Therefore, the policies adopted in the new plan will be flexible to take account of such changes.

Question 79

Should the Council review our current policy position to focus on control of emissions of particles and NO_x during demolition and construction and carry out a risk assessment to identify potential impacts and corresponding mitigation measures?

Question 80

Should the Council require all major developments to be 'air quality neutral' and resist development proposals which would materially increase exceedances levels of local air pollutants and have an unacceptable impact on amenity or health unless the development mitigates this impact through physical measures or and financial contributions to implement proposals in the Council's Local Air Quality Management Plan?

Question 81

What other policies on environmental protection should the Council consider?

Climate Change

1.6.18 Over the last century there has been around a 1°C increase in global temperature (Planning for Climate Change, TCPA 2018). This is in part caused by the increase in harmful greenhouse gases, such as carbon dioxide, (CO₂) which is released into the atmosphere.

This increase in greenhouse gases can be attributed to human activity such as the burning of fossil fuels to produce electricity, driving cars and taking plane journeys.

1.6.19 The NPPF now explicitly refers to the risk of overheating from rising temperatures and makes clear that planning policies should “ensure the future resilience of communities and infrastructure to climate change impacts”.

1.6.20 The Council is committed to tackling climate change in the borough. This will address both reducing our impact on climate change (by reducing the release of greenhouse gases) and by reducing the effect of climate change (by making changes or adapting to climate change effects).

Carbon Emissions

1.6.21 London’s green house emissions are reducing, having fallen by 16 per cent since 1990, largely due to reduced gas consumption and decarbonisation of the national electricity grid. To achieve the Mayor’s zero carbon target by 2050 the rate of emissions reduction must be drastically increased.

1.6.22 The NPPF (paragraph 149 and accompanying footnote) expects LPAs to adopt proactive strategies to mitigate and adapt to climate change, in line with the Climate Change Act 2008. As a result, Wandsworth policy should support drastic reductions in carbon dioxide emissions. Local plan policies can help reduce greenhouse gas emissions and encourage behavioural change through:

- Planning for new development (in the most accessible locations and through the materials or appliances chosen); and
- Actively supporting energy efficiency improvements to existing buildings.

1.6.23 Sustainable building design and construction is an essential response to the challenges of climate change, natural resource depletion and environmental habitat loss. The ways buildings are designed, constructed, operated and decommissioned can have significant impacts on the built and natural environment, for example some may consume major resource (energy, water and materials) inputs.

Question 82

How can the Local Plan ensure that Wandsworth makes real progress in addressing carbon emissions?

Heating Networks and Hierarchy

1.6.24 The draft London Plan helps improve the development of heat networks. Decarbonisation of the grid, and the change in the relative carbon content of electricity and gas, will mean that other technologies, such as low carbon heat pumps, can increasingly serve as the heating source for district heating, offsetting more traditional systems such as gas engine CHP.

1.6.25 The draft London Plan introduces flexibility in areas of London where heat networks are not expected to offer a significant contribution to future decarbonisation. Major developments in all areas are still required to meet a minimum 35 per cent on site reduction as part of the zero carbon target through energy efficiency and the use of lower carbon heating, but this flexibility allows developments in less dense areas to consider other innovative approaches, (such as Passivhaus schemes).

1.6.26 The geographic extent for heat network priority areas are illustrated in the draft London Plan (Figure 9.3). These areas are based on regions prioritised for heat networks by local authorities, areas identified for growth and regeneration, and areas with high heat densities.

1.6.27 The Council is committed to contributing towards the Mayor of London's Carbon Emissions target through promoting the development of new decentralised energy facilities that have the potential to link into a wider sub-regional network and reducing the carbon emissions of all public buildings in the borough.

1.6.28 The proposed new heating hierarchy in the draft London Plan (Policy SI3.D) supports a broader range of technologies and considers air quality to a greater extent than the 2016 London Plan. The choice of heating technology will also be important to achieve long term carbon savings.

Question 83

What other measures could the Local Plan implement to minimise greenhouse gas and carbon emissions?

Waste Planning

1.6.29 The Council is the Waste Planning Authority (WPA) for Wandsworth and is responsible for preparing a waste plan, which can be part of the Local Plan, and to determine all waste development planning applications.

1.6.30 The draft London Plan sets out policy to reduce waste and support the principles of the circular economy. The circular economy is an approach for dealing with waste where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. This approach aims to reduce the volume of waste that is produced overall. In this context the draft London Plan sets out recycling targets for the following waste streams:

- Municipal waste (household waste) – 65 per cent by 2030
- Construction, demolition and excavation waste – 95 per cent by 2020

1.6.31 The current Local Plan and associated SPD (Refuse and Recyclables in Developments SPD) requires the provision of waste storage space within new developments to support the Council's recycling collections service and private services to ensure that waste storage facilities are conveniently located and that the space is available to enable the waste to be collected safely and efficiently.

1.6.32 Q87. Do you have any suggestions on how the Local Plan could help reduce levels of waste and contribute to meeting the recycling targets set by the draft London Plan?

Waste Apportionment

1.6.33 The draft London Plan also sets out policy for boroughs to manage their own waste by allocating waste apportionment targets to encourage self sufficiency of waste management across London by 2026. The Local Plan must therefore allocate sufficient land and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste. Waste management is a strategic planning issue with cross border implications. Wandsworth is one of four boroughs within the Western Waste Riverside Authority (WRWA) and collectively all of the WRWA's residual waste is transferred from Wandsworth to the Belvedere energy from waste facility in the London Borough of Bexley. The London Plan states that existing waste management sites should be safeguarded and optimised and also encourages boroughs to collaborate by pooling their apportionment requirements. In the Adopted Local Plan the Council plans for waste apportionment as part of the Local Plan to meet its waste apportionment target and

it is the intension of the Council to continue this existing approach. The Council's previous adopted waste apportionment figure was 307,000 tonnes per annum (to 2031) which was previously assessed to have been met by the allocation of sites for waste management in the adopted Local Plan. The revised figure whilst increasing in the short term, has been reduced to 280,000 tonnes per annum (to 2041) in the draft London Plan.

1.6.34 The Council is currently working with the WRWA boroughs as part of the duty to cooperate requirements (Section 33A of the Planning and Compulsory Purchase Act 2004) to update the site specific evidence base in accordance with the requirements of the draft London Plan. The aim is to understand the collective waste needs of the group, and determining if the Council has enough capacity to meet its apportionment figure taking into account the collective need of the WRWA area for the overall Local Plan period. Once new evidence is produced as part of the Local Plan preparation process the Council will be in a position to decide how it manages its apportionment figure.

Question 84

Are there any sites or locations that should be considered as a site allocation as part of the Local Plan review for waste management?

Question 85

Should the Council continue to protect its existing safeguarded waste management sites and if not/so why?

Health and Wellbeing

1.6.35 The National Planning Policy Framework (NPPF 2018) states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles. Promoting health and wellbeing is a cross-cutting objective that the Local Plan can help achieve through a number of different policy areas. There are significant links between people's health and the wider physical, social and economic environments they live in. Transport, housing, education, income, food/shopping access, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater long-term influence on health than healthcare provision. Further, cumulative impacts linked to a badly designed built environment can all contribute towards negative lifelong outcomes for residents. Many of these determinants of health can be shaped by the planning system which has a wider role in determining and managing the relationships between the different factors influencing health and in improving overall health outcomes.

1.6.36 Health inequalities demonstrated by significant differences in life expectancy between different parts of both Wandsworth and London, often sit side by side with other causes of deprivation, and tackling them requires a coordinated approach. This broader context is often referred to as the Wider (Social) Determinants of Health (Public Health England, 2017).

1.6.37 The London Plan acknowledges that the quality of the environment is an important determinant on public health. The draft London Plan requires borough-level policies to support proposals for the provision of high-quality new and enhanced facilities to meet identified need and new models of care, and to direct new facilities to areas easily accessible by public transport, cycling and walking.

1.6.38 The Mayor's Health Inequality Strategy has now been published and this explicitly refers to the need to create healthy places which support good mental and physical health.

1.6.39 The Local Government and Public Involvement in Health Act (2007) placed a duty on the Directors for Adults services, Children's services and Public Health to document the health and wellbeing needs of the local population. The Joint Strategic Needs Assessment (JSNA) draws together a wide range of data and evidence to highlight areas of need or inequality that may exist between different areas and groups. Based on the JSNA the borough's Joint Health and Wellbeing Strategy (2015-20) lays out the priorities of the Board, one of which is healthy places.

1.6.40 The Council will be working with partners to understand current and projected health status and needs of the local population, including the quality and quantity of, and accessibility to, healthcare and the effect any planned growth may have on this. Achieving the required levels of growth in Wandsworth while supporting a buoyant office market and vibrant and diverse town centres will require policies to ensure that growth and regeneration schemes provide positive measures to reduce health inequalities. Delivering growth must therefore involve prioritising health in planning decisions, including through design that supports health outcomes, and the assessment and mitigation of development proposals on health and health inequality.

1.6.41 The adopted Local Plan addresses a wide variety of issues that directly and indirectly impact on the health and wellbeing of Wandsworth residents and workers, such as protection of open space, promoting walking and cycling, air quality, controlling concentrations of hot food takeaways, and the protection of local shops. Understanding the health needs of the local population is part of the evidence base for the new local plan, and engagement with health and community stakeholders will take place.

Question 86

The Local Plan addresses a wide variety of issues that directly and indirectly impact on the health of the population. Are there any areas in which it is currently deficient or could be strengthened to ensure future development better serves the health needs of Wandsworth's residents and visitors?

1.7 Community Services and Infrastructure



1.7.1 A defining feature of any neighbourhood is the local facilities it provides for its communities. Residents need good access to high quality facilities and infrastructure to support their health and well-being. Providing facilities close to home reduces the need to travel by private car and creates desirable and more inclusive places to live. Planning has a role and responsibility for ensuring that

effective engagement takes place with the relevant infrastructure, education and healthcare providers, to ensure that we effectively plan for the public health and education needs of our local communities.

1.7.2 In order to provide the social facilities and services the community needs, the NPPF states that planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities and take into account and support the delivery of local strategies to improve health, social well-being for all sections of the community.

1.7.3 The cost of land in Wandsworth means that community facilities may come under pressure from uses which attract higher land values and without protection against this, the community may lose an accessible facility. Once a site is lost to other uses it can be very difficult to find alternative sites, especially for use by voluntary groups. Demand for different types of community service and facilities will change over time, but it is important these premises are retained to meet the future needs of Wandsworth borough residents, in line with Council's policy of promoting equal opportunity. The adopted local plan acknowledges that the safeguarding of existing community facilities will help to realise the potential for community use of existing buildings and encourage re-use of buildings when they become available. The NPPF sets out that policies should guard against the loss of valued facilities particularly where it would reduce a community's ability to meet day-to-day needs.

1.7.4 In a built up borough like Wandsworth where there are many competing uses, it is important to maintain, manage and enhance community facilities. The draft London Plan 2017 sets out that social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes definitions which include health provision, education, community, play, youth, recreation, sports, faith and emergency facilities. Social infrastructure should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets approach. The draft London Plan sets out that is important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area might want to access it. For example it introduces a new policy approach that requires provision of public toilet in 'large scale commercial development'.

1.7.5 By having robust and well thought out policies, places and neighbourhoods can be made as adaptable as possible, so that people can live their whole life within their community supported by the required services and community infrastructure. This approach is supported by the draft London Plan which states that Local Plans should identify sites for future provision, particularly in areas with significant planned growth.

1.7.6 Delivering community services and related development also depends on the provision of adequate and appropriate infrastructure. As part of the local plan review the Council will prepare an Infrastructure Delivery Plan, which will provide

comprehensive details outlining the infrastructure required, likely timing of delivery, who will deliver it, costs, funding sources and potential gaps in funding to support the Strategic Policies will be prepared.

1.7.7 The Council will seek to ensure that there is adequate transport, electricity, gas, water supply, surface water, foul drainage and sewerage, telecommunications and waste and recycling facilities to serve all new developments.

1.7.8 The quantity and quality of these services are important factors in planning for growth for Wandsworth. The Council has worked with neighbouring authorities and infrastructure providers and will continue to do so as the Local Plan moves forward to ensure that investments are made in the relevant infrastructure.

1.7.9 The Infrastructure needs of the proposed new homes will be considered by the IDP and should identify any issues with delivery.

1.7.10 As development creates additional demands on infrastructure, it is a sound approach that developers should contribute towards improvements to, or the provision of, new infrastructure.

1.7.11 There are a number of mechanisms to secure these contributions, including planning conditions, planning obligations (s106) and a Community Infrastructure levy (CIL) charge. Supporting infrastructure will need to be funded not only from developer

contributions but also through investment in new facilities by infrastructure providers. The Council will seek to maximise the use of external funding to deliver infrastructure improvements and seek new methods of securing funds.

Question 87

Should the Council clarify the definition of community facilities and expectations around their retention, re-provision (where necessary and appropriate) and inclusion in new development?

Question 88

What sort of facilities would you want to see provided alongside new development, to help create sustainable communities and walkable neighbourhoods? How can facilities for workers and residents be best delivered?

Question 89

Should the Local Plan aim to meet the need for social and community services in full within the borough or work with partners in neighbouring boroughs?

Question 90

What infrastructure is needed in Wandsworth over the plan period (15 years) and are there any particular sites or locations where they should be provided?

Question 91

Which infrastructure has the potential to be co-located within larger multi-purpose buildings which can adapt to various uses?

Question 92

Should we include a policy on public toilets, being clear that new publicly accessible toilets should be provided for in new strategic development?

Education

1.7.12 Education facilities, including schools, higher and further education, and early years and childcare provision, are important types of social and community infrastructure, which are integral to making Wandsworth an attractive place for families with children to live. The Council has a legal duty to secure sufficient early years education, primary and secondary school places. In recent years, changes to legislation have meant local councils have increasingly become commissioners of school places, rather than providers with an increasing number of schools becoming self governing. It is important through the plan to ensure sufficient sites are allocated for education uses. New housing developments currently produce greater numbers of school age children than established communities. It is therefore important that new schools are designed with some flexibility to expand if necessary to meet increased demand. The adopted Local Plan supports the dual use of social, educational and community facilities.

1.7.13 The draft London Plan reiterates this approach and seeks high quality education and training provision, including the allocation of sufficient sites and the development of childcare facilities, schools, colleges and universities in appropriate places.

1.7.14 In line with the requirements of the NPPF the Council will work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Question 93

How can the Local Plan be more flexible in meeting the demand for school places?

Question 94

What else should the local plan consider in ensuring the educational needs of the borough are met?

Healthcare

1.7.15 Life expectancy rates have gradually improved in Wandsworth over the period 2014 to 2017 from 70.2 to 70.7 for males and 83.3 to 83.6 for females. In general, the more affluent

parts of Wandsworth also have the best health. The gap in life expectancy between the most and least affluent areas is more than seven years.⁷ Improving health and social care is a key corporate objective. Latest projections show that in 50 years time, there are likely to be an additional 8.6 million people aged 65 years and over (roughly the same size as London).

1.7.16 Healthcare requirements increase with age, with healthcare costs increasing steeply from around age 65 years.

1.7.17 Growth will place additional demands on those responsible for the delivery of a range of health facilities including primary care (e.g. GP), secondary care (e.g. hospital care).

1.7.18 As part of the reorganisation of the health service, the Council has taken over the responsibility for public health.

1.7.19 The Council will be liaising with health care providers such as Wandsworth Clinical Commissioning Group (CCG) and local NHS Trusts, as well as with Public Health Wandsworth to ensure that appropriate health infrastructure and services are provided alongside new development and that this is appropriate to the scale and growth we plan for.

1.7.20 The adopted Core Strategy policies currently support the provision of improved health services having regard to scale of development and public transport availability.

Question 95

What policies are needed in the plan to deliver the health infrastructure needed to support growth?

Question 96

How can the Council further support the health services in ensuring sufficient sites and support is available.

Existing Local Plan Policies

1.7.21 The Council's existing planning policies contained are contained in the Council's suite of Development Plan Documents and are available on our webpages at http://www.wandsworth.gov.uk/info/1004/planning_policy.

Question 97

Are there existing policies that you consider to be still relevant, need changing or are no longer appropriate or necessary? For each policy please explain why and be sure to set out any necessary changes that you think each policy might require.

Question 98

Should the new local plan seek to combine all policies into a single document? Please explain your answer.

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