



From the Leader of the Council

*Leader's Room,
The Town Hall, Wandsworth High Street
London SW18 2PU*

Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities
and Local Government

Sent by email: jenrickr@parliament.uk and
planningforthefuture@communities.gov.uk

29 October 2020

Dear Secretary of State,

Wandsworth has a track record in delivering estate regeneration and homes on its own land. We also work closely with developers, such as in the Vauxhall Nine Elms Battersea Opportunity Area. Much more emphasis is needed to ensure schemes are built out and delivered. We recommend that government sets out parallel proposals for developers and landowners. One approach would be to further consider the report on the "Independent Review of Build Out" (2018) by Rt Hon Sir Oliver Letwin. In addition, the July 2020 Housing Delivery Recovery report of London's Housing Delivery Taskforce contains some proposals worthy of further consideration.

In Wandsworth we have a strong record of successfully delivering the homes that our residents need alongside providing the necessary infrastructure to create places we can be proud of and where residents want to live and work. We agree that the system needs to be improved and simplified in some areas. However, we are concerned that the proposals will over-simplify the planning system, such as the proposed categorisation of land into three areas and the proposed fundamental changes to the Infrastructure Levy, as well as the general attempt to make as many decisions as possible at a national level.

In Wandsworth the current system has proved very effective: in 2019, 91 per cent of the planning applications submitted were approved, which is amongst the highest in London. The Council has consistently delivered above the targets in its up to date Local Plan and in the adopted London Plan. The Community Infrastructure Levy has enabled the Council to deliver the infrastructure needed to enable sustainable growth with a keen eye to the challenge of Climate change.

Wandsworth Council's ambition is to be the greenest inner London borough by 2030. There is the potential for the reforms to be revolutionary and for the UK to be a vanguard in tackling the climate emergency through both plan-making and decision-taking functions, as well as guiding development and growth. Whilst we acknowledge

that the White Paper sets out some initial proposals, the focus on 'beautiful and sustainable' places should be expanded to ensure that climate change, wildlife and the natural environment are a key feature in a revised system. 'Beauty' is a matter of personal taste and objective criterion should be established to guide those bringing forward development noting that the Wandsworth Design Review Panel has been positively received by developers and has added value.

Considering COVID-19, we need to review how we plan our homes and neighbourhoods. We recognise that health and wellbeing play a crucial role in creating environments that promote and support healthy and active lifestyles and reduce health inequalities. We strongly believe that we need to address the needs of the most vulnerable in our society, which will enable us to meet other longer-term requirements, including savings to be made in delivering housing, health and social care.

Both CIL and Section 106 have yielded dividend for Wandsworth borough and are a crucial element of the resource needed to deliver development which residents support as they can see it improves facilities and amenities in their local area. The proposed changes will significantly alter the current arrangements working to our detriment, we simply cannot envisage how this could work at a national level. At a time of great economic uncertainty and with the financial pressures resulting from the COVID-19 crisis, we do not think this is the time to significantly shake-up the way we secure infrastructure and affordable housing. We do not support the proposals to reform CIL and Section 106.

The White Paper refers to the following important matters in the context of local government finance and achieving the right outcomes through the planning process:

- **Skills strategy:** This is essential to support the implementation of the reforms. We recommend that this will come with government funding as local planning authorities will be at the heart of implementing the new reforms.
- **Planning fees:** In many instances the fee levied for each type of application does not fully cover the cost to the Council of determining that application. We agree therefore that "Planning fees should continue to be set on a national basis and cover at least the full cost of processing the application type based on clear national benchmarking." We are however concerned that the numbers, types and scope of applications continue to increase but fee income does not by the same rate, yet the call on resources required to process those applications is also greater. This includes access to expertise in areas such as environmental protection and biodiversity.
- **Enforcement:** We support the strengthening of planning enforcement powers and sanctions; this will assist in helping to uphold a rules-based system and to provide confidence to communities.

Finally, we welcome the notion of reforming the existing planning system to improve quality and efficiency, we do not believe that an entirely new system is needed. We acknowledge that this is a genuine consultation by government and have focussed our response on positive actions or recommendations making clear where we do not consider proposed reforms will achieve the desired outcomes. The Council has offered in its response to share learning with MHCLG on bringing forward growth at

scale through using design codes and masterplans underpinned by infrastructure funding secured through section 106 and CIL. I would encourage you to take the opportunity offered to further develop proposals for reform based on practical examples that have been successfully delivered on the ground.

Yours sincerely,

A handwritten signature in black ink that reads "Ravi Govindia". The signature is written in a cursive, slightly slanted style.

Councillor Ravi Govindia
Leader, Wandsworth Borough Council

Enc. Wandsworth consultation response - Planning for the Future

**CC: Cllr John Locker, Cabinet Member for Strategic Planning and Transport
Mrs Jenifer Jackson, Assistant Director of Environment & Community Services (Planning and Transport)**