



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:

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28 January 2021

Dear Secretary of State,

RE: Supporting housing delivery and public service infrastructure

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, and on many other large and strategic sites in the borough, granting permission and delivering a significant amount of new housing over and above our annual housing target. The Council is fully committed to providing much need housing in sustainable locations, and this is also demonstrated in our future housing land supply.

I acknowledge that the proposed PDR would contribute to meeting housing needs. However, it would threaten and undermine the borough's ability to plan for its employment, commercial and social infrastructure uses. The borough's town centres, high streets and local centres and the economy have been severely impacted by the Covid-19 pandemic. The proposed PDR would occur at the worst possible time as it would coincide with the economic and social recovery process, and such a PDR could undermine the adaptation process of our centres to ensure they once again become diverse, vibrant and successful locations for a range of activities and uses.

The Council is also concerned that the proposed PDR would undermine the Local Plan and the plan-making process. It is difficult to envisage how an authority can plan for and meet its required needs for economic development and to plan for the future of our town centres. Use Class E of the Use Classes Order 1987 was introduced on 1 September 2020 and covers the former use classes of A1 (shops), A2 (financial and professional), A3 (restaurants and cafes) as well as parts of D1 (non-residential institutions) and D2 (assembly and leisure) and puts them all into one new use class E. There is now considered to be significant freedom for changes of use within our high streets (though noting that the proposals already apply everywhere and not just in town centres).

The proposed PDR could have an irreversible and significant impact on the supply of land for economic and commercial development, including the scale and variety of

job opportunities available, all of which will ultimately influence whether our town and local centres continue to be attractive 'destinations' that people will want to go to. In addition, if the diversity of uses within town and local centres is eroded and the balance shifts to residential, cumulatively this could have further impacts including but not limited to reduced footfall, reduced attractiveness to visit, changes to travel and commuting patterns particularly if there are fewer local job opportunities, as well as potential impacts on both climate change and air quality.

The Council is particularly concerned that years of master-planning and place-making could be put at risk in the Vauxhall Nine Elms Battersea Opportunity area, undermining the Council's efforts to create vibrant new mixed-use areas with high quality employment opportunities.

The Covid-19 pandemic has demonstrated the importance of essential local facilities that are key to supporting sustainable communities. The Council is not only concerned about the impacts upon the vitality and viability of our centres, but also the potential impacts upon the health and wellbeing of existing and future residents if creches, nurseries, clinics and health centres, gyms and indoor sports venues were to be lost under the proposed PDR. The provision of additional housing should not be at the expense of social infrastructure, particularly facilities that provide for young children or that contribute to enabling residents to lead active and healthy lifestyles.

The Council does not support the principle of the proposed PDR but is keen to engage positively with the government. Therefore, the Council's detailed response proposes several potential mitigation measures that the Council would want to see addressed should the proposed PDR go ahead:

- Delay the proposed PDR by a further 12 months (i.e. until 1 August 2022) so it does not coincide with the immediate post Covid-19 pandemic or seeds of recovery and to give time to better understand the local demands;
- Extend time limits for existing office/retail and light industrial to residential Article 4 Directions until at least end of August 2022 to allow local authorities more time to prepare their evidence and justification to introduce new Article 4 Directions;
- Introduce a vacancy requirement, e.g. for buildings to which the right will apply to have been vacant for a minimum period of at least 6 months;
- Remove Class E(e) i.e. medical or health services; and E(f), i.e. creches, day nurseries or day centres from Use Class E, to limit the impact on social infrastructure, particularly as the proposals are not limited to town centres and could apply anywhere;
- Incorporate Conservation Areas within the areas excluded from the PDR;
- Ensure that the proposed PDR does not apply to listed buildings;
- Require contributions to affordable housing in line with local policies;
- All changes of use should be liable to pay Community Infrastructure Levy;
- Introduce criteria in the prior approval process that relate to design quality and the quality of the proposed accommodation, including external appearance and arrangements that may need to be reconfigured to suit residential uses (e.g. for access, bin storage, provision of cycle parking as well as outside space (the value of which has become particularly evident during the Covid-19 pandemic));

- Introduce criteria to consider the potential impact of a change of use on the sustainability of the town centre / local centre / shopping parade, on existing uses and their continued operation such as in relation to industrial services and also whether there is no reasonable prospect of the building not continuing to provide for services within Class E.

Finally, the Council would like to point out that there appears to be a mismatch in government aims and ambitions relating to town centres and high streets. On the one hand, this consultation in particular sets out proposals that would significantly limit the ability of authorities to take a strategic and place- as well as evidence-based approach to planning for, and supporting, town and local centres, whereas on the other hand there are several high-profile government initiatives designed to help these very areas thrive, such as the [High Street Task Force](#) and the Town Deal funding as well as the announcement on the creation of an [Urban Centre Recovery Taskforce](#).

I am also concerned about the long-term viability of our Business Improvement Districts (BIDs), which are business led local partnership that allow the business community and local authorities to work together in an effective and cooperative manner to improve our local centres. There could be consequences to their continuity as the levy is based on all business rate payers in the local area.

In our full response to this consultation we have sought to engage positively with this consultation and provide detailed feedback on the proposed measures, including recommendations for the government to consider.

Yours sincerely,



Councillor Ravi Govindia
Leader, Wandsworth Borough Council

Enc. Wandsworth consultation response – Supporting housing delivery and public service infrastructure, 28 January 2021

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