



From the Leader of the Council

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LONDON PLAN: COMMENTS FROM VAUXHALL NINE ELMS PARTNERSHIP

Dear Mr Khan,

As the Co-Chair of the Vauxhall Nine Elms Partnership I write to share some of the lessons that the Partnership has learned over the last 8 years of successfully delivering our agreed vision for the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area of an internationally significant business district, a new centre for arts and culture in London and the location for a significant number of new homes to add the existing residential communities in and around the area. With the focus of the Draft London Plan on implementation, the Partnership hopes that these lessons may serve as examples of good practice for delivery that other Opportunity Areas identified in the Draft London Plan can benefit from.

Over 25% of the 20,000 homes planned for the area are now complete with new residents moving into the variety of housing tenures on offer – private sale, private rented sector, social rent, affordable rent and shared ownership are all available in the vast 460-acre district. Planning consent is granted for another 16,856 homes in addition to those that have already been delivered.

The inclusion of the Opportunity Area in the Central Activities Zone has contributed to its success in bringing forward a genuinely mixed-use development, laying the foundation for a district with a strong local economy and the achievement of 25,000 jobs. The announcements that high-profile digital, design and technology institutions – Apple, Penguin Random House – are moving into the area and the nearby expansion of the Royal College of Art, along with the recent opening of the US Embassy, are already leading to regular business openings throughout the area and will undoubtedly spur other businesses to make similar moves, supporting the target for new jobs.

This spectacular pace of delivery has only been possible due to a combination of certainty and a flexible approach that the Planning Framework has provided and the willingness of all the Partners to be flexible and grasp opportunities as they arise. It has enabled the Partnership to ensure that, alongside world-class mixed use residential and commercial development, the social, transport and utilities infrastructure, environmental improvements, cultural programming and employment and skills opportunities for residents continue to be delivered. These are vital elements of place making for the area to underpin the local economy. It has also enabled us to co-ordinate construction and logistics to ensure that the impact of construction on local people and London is minimised and managed.

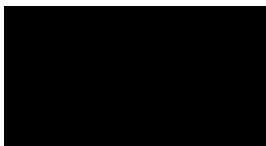
Notwithstanding these achievements there remains significant infrastructure and investment required over many years to come, and the Partnership is pleased to see the Opportunity Area still referenced in the draft London Plan, which provides continuity and certainty in respect of planning policy and guidance for the area, as well as maintaining confidence for existing and future investors in the area, public and private.

However the Partnership notes with some concern that the Draft London Plan has revised figures for the jobs and homes expected to be delivered in the Vauxhall Nine Elms Battersea Opportunity Area to 18,500 of each, compared to the 20,000 homes and 25,000 jobs in the adopted London Plan without adequate explanation as to how these have been determined. The adopted figures are used in Wandsworth's Local Plan, and while Lambeth's current Local Plan - which predates the 2016 London Plan - includes the older figures (20,000-25,000 jobs and 16,000 homes), the current London Plan figures are used and well understood by both Councils, the public and developers in the Opportunity Area. The Partnership's monitoring indicates that development is on track to meet the figures in the currently adopted London Plan. We hope that clarification on this issue will be provided in the further development of the Draft London Plan.

The certainty provided by planning policy cannot be understated as ongoing coordination and strong partnership working, with the Mayor's full support, is still required to realise the area's full potential in terms of the Partnership's commitments to new homes and jobs delivery. Whilst the area has benefited from significant public and private sector investment, the scale of development underway, and envisaged, means the demands on infrastructure remain extremely challenging and may impact on development viability. The infrastructure programme encompasses the £1 billion investment that is committed to extend the Northern Line and create a better district centre at Vauxhall with transformational transport changes which will see the one-way system returned to two-way roads, significantly improved provision for pedestrians and cyclists and a brand new modern bus station. New schools, health and community facilities and an 11 acre linear park, stretching from Vauxhall to Battersea Power Station, as well as aspirations to see Battersea Park Station incorporated into the Overground network are all part of the programme. All these components are essential to ensure we deliver a successful new extension to the CAZ, the most economically productive part of the London and UK economy.

The Partnership remains committed to delivering one of the largest regeneration projects Europe and we look forward to continuing Mayoral support to collaborate positively with landowners and infrastructure providers to allow the growth to continue at pace.

Yours sincerely



Councillor Ravi Govindia
Leader, Wandsworth Borough Council

Wandsworth Council Response to Draft London Plan Consultation

Wandsworth Council welcomes the opportunity to comment on the Mayor of London’s consultation on his Draft new London Plan. Please find comments to those policies the Council wishes to comment on set out below.

Analysis of Key Policies

1. Chapter 1 Planning London’s Future (Good Growth Policies)

1.1. Policy GG1 Building strong and inclusive communities – Support

Welcome the overall approach of Policy GG1 to help build strong and inclusive communities.

1.2. Policy GG2 Making the best use of land – Neutral

The principle of the overarching objective to making the best use of land and the approach to developing on brownfield land first is supported. The Council is concerned however, as set out under other policies that the approach will lead to the creation of higher densities in inappropriate locations.

The Council questions why the Mayor has not undertaken a review of the greenbelt to potentially accommodate part of London’s housing capacity target. A review could tie in to the good growth principles and look at possible sites of low environmental quality as a potential way to assist in meeting projected housing needs for London and the wider south east. A sensible review and release of such land, as well as building on it where appropriate may be acceptable provided that the land is of low environmental quality and no longer meets the purposes set out in national policy (NPPF). The Mayor has the power to lobby Government to enable sensible reviews and releases of such low environmental quality land to meet its housing need, and in addition, the Mayor could instigate a London-wide strategic review of Green Belt land. It would be preferable to allow London to grow out by reviewing low environmental quality land rather than destroying the existing character and liveability of London. For example, developing on back garden land or putting increased pressure on land and open spaces that have been designated as being of local importance. This comment relates to the Council’s overall comment that it makes about the lack of infrastructure to accommodate growth and considers both areas should be reviewed to fit with the Mayors approach to ‘good growth’.

1.3. Policy GG3 Creating a healthy city – Support

The Council supports the policy statement as it explicitly makes reference to planning playing a critical role in helping to improve Londoners’ health and reduce health inequalities. It also acknowledges the impact that areas of deprivation have on peoples’ health outcomes. The Council requests that the Plan explains what ‘wider determinants of health’ as non-health professionals may not be aware of what it means. In Section E, where it mentions “improved access to green spaces and the provision of new green infrastructure” we would suggest the addition of “access to good quality green spaces”. Green space on its own will not deliver benefits if such spaces are not attractive or useable.

Involvement in arts and culture is proven to improve health outcomes, especially for the growing isolated elderly population and people with mental health issues. We recommend that culture should be specifically included in Policy GG3 as green space is.

1.4. Policy GG4 Delivering the homes Londoners need – Object

The Council objects to new housing target which is considered to be unrealistic. See comments to Policy 4.1 for detail. The Council is disappointed at the lack of collaboration with the GLA regarding the small sites element of the housing target and considers it to be unrealistic.

1.5. Policy GG5 Growing a good economy – Support.

The Council supports the overall policy but urges caution over the flexibility of potentially allowable within Industrial areas. The Council emphasizes the importance of using a local evidence base to enable the protection of its key employment sites and making sure any residential development that is proposed is not to the detriment of industrial and office locations.

1.6. Policy GG6 Increasing efficiency and resilience - Support.

Welcome the policy to deliver a zero carbon city by 2050.

2. Chapter 2 Spatial Development Patterns

2.1. Policy SD1 Opportunity Areas - Object.

The Council has had success to date in working within an Opportunity Area Framework at Nine Elms/Vauxhall, where the positive approach of the Council has been the major driver in a partnership approach with Lambeth Council, the GLA/TfL and developers, as well as other stakeholders. This has resulted in the high density development of high design quality with the delivery of a significant number of new homes including affordable homes, commercial/employment floorspace and new transport and social infrastructure, including the continuing progress on the Northern Line extension and Thames Tideway Tunnel. The figures for jobs and homes expected to be delivered in the Vauxhall Nine Elms Battersea Opportunity Area have changed from those in the adopted London Plan without adequate explanation. The Council considers the revised 18,500 figures for each of jobs and homes in the Vauxhall Nine Elms Battersea Opportunity Area presents confusion when compared with the adopted 25,000 (jobs) and 20,000 (homes) figures. The adopted figures are used in the Council's Local Plan which are well understood by the Council, the public and developers in the Opportunity Area. If the new figures are to be used then wording should be added to state the differences between the adopted position and the proposed position or to indicate that the original figures are still on course to be achieved. Clarification is sought that the new figures represent no reduction in the expected level of jobs and homes as set out in the existing adopted London Plan. The Council's own monitoring indicates that development is on track to meet the original figures and considers it unhelpful to quote new figures which could confuse future monitoring with an apparent reduced target.

With the successful experience gained by the Council on the Nine Elms Opportunity Area, the Council questions what the advantages are of designation of Clapham Junction as an Opportunity Area for the potential to accommodate a baseline 2,500 homes and 2,500 jobs in the absence of a comprehensive Planning Framework. The Council is actively involved with progressing Housing Estate Regeneration with the first phase planning application submitted for the Winstanley/York Road masterplan, which will see an overall net increase of some 1660 homes and new community facilities. The Council is also undertaking Estate Regeneration at Alton/Roehampton, which will see an overall net increase of some 800 homes and new community facilities for which a planning application is scheduled for Spring 2018. It is considered that the existing Housing Zone is comparable to the level of growth identified for the proposed Clapham Junction Opportunity Area and would question what the benefit is over the Council's existing regeneration scheme and site allocation approach as set out in the Local Plan.

There is scope for clearer support for employment growth where local conditions provide for this and also for more coherence between policies. The Council's leadership on delivering the VNEB Opportunity Area demonstrates how local authorities are essential to both implementation and the 'good growth' agenda. Policy continuity with regards to Opportunity Areas is welcome but the designation of Clapham Junction as an OA is not supported given the existing Housing Action Zone framework and Site Allocation approach of the Local Plan. Future transport enabled development will have significant impacts and development will need to be well integrated with its surroundings, not only to the north, but also with the town centre, supporting its role serving the local community as well as passing trade. Managing this integration successfully is best led by the Council. The town centre policies show welcome recognition of the future challenges and the responses to them. However, different centres require different responses and identifying and agreeing the most appropriate balance of development is something that local authorities are best placed to lead on, working with local stakeholders.

The Council has long been supportive of a new Crossrail 2 station in Clapham Junction, and has long been aware of, and keen to resolve capacity issues at the Station and to realise an up to date and integrated solution to transport interchange. The Council will continue to work with Network Rail and TfL to investigate the issues and opportunities that can be achieved. The Council would wish to see affordable housing as part of any development, and consider that it is important that improvements to the station infrastructure are not resolved at the expense of affordable housing or other local benefits. The Council is content to engage with GLA in looking at the appropriate locally led model to realise the benefits for the Clapham Junction area.

2.2. Policy SD2 Collaboration in the Wider South East & Policy SD3 Growth locations in the Wider South East and beyond - Object

There is no real evidence on joint working with Wider South East and assumptions continue to be made that all of London's housing need should be accommodated within Greater London; the Mayor should continue lobbying Government on accommodating some of London's need outside London, and letting London 'grow out'. The Plan should

recognise and support the commuter corridors and supporting infrastructure needed to allow for growth outside of London. A detailed strategy should be developed to further support the potential of growth in the wider South East region which the Plan currently lacks. The Council urges the Mayor of London to further collaborate with the wider South East Councils.

2.3. Policy SD4 The Central Activities Zone (CAZ) & Policy SD5 Offices, other strategic functions and residential development in the CAZ – Support

The Council welcomes the continuation of support of the CAZ in its international, national and London-wide roles. Support the recognition that office role is of national and international significance. The Council's emerging Local Plan – Employment and Industry will plan for around 200,000sqm of new high spec office floorspace aimed at large national and multi national businesses and welcomes this recognition. Large, high spec offices will continue to be encouraged in Nine Elms to meet the demand for the central London Office market and to achieve a critical mass of economic uses around Battersea Power Station. The reference to the competing policy requirements of office and housing being given equal weight in decision making is welcomed.

Welcome the air quality references to address issues related to climate change.

2.4. Policy SD6 Town centres – Part Object, part support

The overall policy is generally supported and the criteria which acknowledge the importance of town centre adaptation to support changes in consumer b. However, the London Plan now recognises Southfields as a 'District Centre' along with Balham and Earlsfield, which were both identified in the previous adopted London Plan. The Council objects to Southfields being included as 'District Centre' as this classification is confusing when applied to the Local centre hierarchy approach. As currently worded there is an implication that District Centres are town centres, which they are not. The Council designates its centres as part of the Local Plan process and the scale of development proposals should reflect the position of the Southfields centre as a Local Centre in the Local Plan town centre hierarchy. This could be interpreted by developers as suitable for large-scale development serving a wider catchment and encourage inappropriate development proposals. The Council designates its centres as part of the Local Plan process and the scale of development proposals should reflect the position of the Southfields centre as a Local Centre in the Local Plan town centre hierarchy, and the London Plan wording should help avoid any misinterpretation of the role and function of the District Centres listed there.

2.5. Policy SD7 Town centre network - Neutral

There would be benefits to the Wandsworth town centres of a level of intensification of business activity and we support the assessment of our main town centres as having 'moderate' commercial growth potential. However, growth potential is strongly influenced by infrastructure investment in particular centres which is sometimes transformative; this is especially the case for those areas earmarked for Crossrail 2 stations. Whilst such changes may not in themselves justify changes to the status of town centres within the

London Plan network definition, the relevant policies are somewhat silent on how town centres might manage the impact of significant new infrastructure (including during its construction) and there could be better linkages with other parts of the Plan in this regard.

The London Plan now recognises Southfields as a ‘District Centre’ along with Balham and Earlsfield, which were both identified in the previous London Plan. The recognition within the centres hierarchy would not change the local designation and is confusing. The Council designates its centres as part of the Local Plan process and it is expected that the scale of development proposals should reflect the position of the Southfields centre as a Local Centre in the Local Plan town centre hierarchy. The Mayor should consider renaming the Network ‘Town and District Centres Network’ and recognising local centres in the text rather than simply referring to town centres. As currently worded, there is an implication that the District Centres listed in Table A1. 1 are town centres, which they are not, and which contradicts the Plan’s own definition of District Centre ‘... providing for more local communities’. This could be interpreted by developers as suitable for large- scale development serving a wider catchment and encourage inappropriate development proposals. An introductory paragraph of explanation regarding Local Centre designations would help avoid any misinterpretation of the role and function of the District Centres listed.

Vauxhall is identified as a smaller CAZ frontage in Lambeth Council’s adopted Local Plan providing local shops and services. It is unhelpful that the draft London Plan includes Vauxhall as a CAZ retail cluster which is defined as being ‘significant’ and broadly comparable to Major or District centres. It is considered that Vauxhall similar to the point above it is considered that the centre will remain as a Local centre. It is important to ensure that the majority of retail growth and larger floorplate stores are located at the Battersea Power Station potential major town centre, in accordance with the Wandsworth Local Plan.

2.6. Policy SD8 Town centres: development principles and Development Plan Documents - Neutral

Criteria A1 can be read to offer limited flexibility regarding areas that the sequential retail approach is applied. If local evidence determines that an alternative area is suitable then this should also be appropriate.

2.7. Policy SD9 Town centres: Local partnerships and implementation - Support

The proposal for active planning with town centre stakeholders is supported both to manage growth potential but also to adapt this to changing economic and social trends, including new workspace provision, adapting to the growing visitor economy and any extension of the night time economy. All these things will add development pressure on generally high quality environments so choices are likely to be required. To this extent, the need for active planning of town centres is supported – but this does have resource implications which the Plan does not adequately address. And whilst BIDs, town centre partnerships etc. are important partners, it is important to establish a long term vision meaning the local authority is going to be the principal agency for doing this

2.8. Policy SD10 Strategic and local regeneration – Support.

Generally supportive of such a policy as it seeks to tackle spatial inequalities by ensuring Local Plans identify Local Areas for Regeneration taking into account local circumstances, demographics of communities and communities needs. It would also contribute to the renewal of town centres in Strategic and Local Areas for Regeneration. However, the Council seeks clarity on whether there will be any criteria to guide Local Plans when identifying Local Areas for Regeneration and developing locally sensitive policies.

3. Chapter 3 Design

3.1. Policy D1 London’s form and characteristics - Support

Policy D1 is generally supported but could benefit from adding the word ‘conserve’ in D1 B4. The text following the policy is lacking a vision for London as a World City.

3.2. Policy D2 Delivering good design – Neutral/Support

In Policy D2 C whilst the use of 3D modelling to support proposals is welcomed, the GLA should take the lead in prescribing the parameters for their use. It would seem practical for each London Borough to be using compatible systems so that analysing applications for tall buildings can be shared with adjacent boroughs as well as with the public as part of consultations.

Cumulative development considerations are very important to consider when assessing schemes. Appropriate weighting should be given to the assessment of environmental conditions and the impact of clusters of large scale/tall buildings.

Wandsworth set up an independent Design Review Panel in 2012 which operates in addition to planning and urban design officers’ assessment. The referral parameters for pre-application design reviews in Policy D2 F are supported.

The principles of Design Review set out in Policy D 2 G are supported.

Whilst recognising the importance of maintaining design quality from application to build out stage, clarification is sought as to how legally robust it would be for Local Authorities to include architect retention clauses in S106 legal agreements as sought in the Plan to make a developer engage the original architect for the remainder of the work. An alternative option would be to seek a developer contribution for the assessment of details required under a condition of consent, and for the inspection of the work on site to ensure compliance. A London-wide approach to design reviews is not supported as boroughs should be allowed to set up their own processes and management of such reviews to suit local circumstances.

With reference to ‘referable applications to have undergone at least one design review’ – there is evidence to support the need for major applications to require more than one review throughout the process – on average three reviews (evidence from UCL - Design Review Survey which is in draft form and should be published 2018).

It is recognised that reference is made in the following text (paragraph 3.2.6) to the role that the Mayor’s Design Advocates will have in supporting the operation of the policy (including in the use of design review), however this is very general. Further clarification is required on their role and extent of the help that local authorities might reasonably expect would be useful.

3.3. Policy D3 Inclusive design - Support

Policy D3 is welcomed however part B should include reference to access from the street to the building and where masterplans are used to deliver schemes the wider inclusive environment is considered.

3.4. Policy D4 Housing quality and standards – Broadly Support with some objection.

The housing standards set out in Policy D4 broadly align with the Interim London Housing Design Guide of which there is no reference. It is noted that the Mayor will produce guidance on the implementation of this policy for all housing tenures, which is welcomed.

Support for minimum indoor space standards across all tenures and for providing details regarding head height to enable a consistent approach for determining if a property meets the standard.

Object –to the style of presentation/ wording of the policy in how it aims to deliver high standards and quality. The wording states that the policy should be used for determining a planning application rather than borough- specific policies. The wording is not specific enough (apart from indoor space standards) and is contrary in part the NPPF which requires local planning authorities to reflect local context.

Object to the lack of clarity (part F) on the definition of ‘adequate’ daylight and sunlight – there are relevant BS standards for windows to habitable rooms which should be a minimum.

Object to the definition of outdoor amenity space – this is not specific enough for a stand-alone policy and should explain exactly what is to be counted.

Part C needs to be more specific in that it could give criteria of what qualitative aspects should be considered.

Object to having a minimum standard for outside space- the NPPF requires local planning authorities to have regard to local context, and this varies widely across London as well as within authorities such as Wandsworth. In addition many parts of Wandsworth are designated conservation where development with a 5m garden space would be out of character. Implementation will be inconsistent as outdoor space will be determined by those boroughs which require a minimum distance between habitable rooms of dwellings.

Support for setting out the size of balconies however this part of the policy could be improved by reference to potential amenity concerns from larger balconies and the relationship of balconies to other dwelling units and uses.

There is inconsistency as balconies and smaller outdoor space does not best meet the needs of children mentioned in part B of the policy.

3.5. Policy D5 Accessible housing - Support

The Council supports the aim of the policy, and the supporting text which advocates the use of planning conditions and sets out what they should contain to ensure building control compliance with the M4(2) and M4(3) dwelling standards.

3.6. Policy D6 Optimising housing density - Neutral

The Council welcomes the thrust of the Policy which aims to develop at optimum density and considers that a design-led approach is favourable. However, as part of the suggested design-led approach there is little contained in the policy on the consideration of local character and sense of space and any indication of levels of density which the Council and the public can comment on. Although removing the density matrix as set out in the existing adopted plan is welcome, this creates ambiguity as to how density would be assessed which does not help local communities in knowing what densities they can expect and therefore at the strategic level there is nothing local communities can comment on which would give them a better idea of density expectation levels. Instead more pressure is put on Local Authorities to develop masterplans and design codes, as suggested in Policy D2 with limited strategic guidance. An unrealistic housing target coupled with a lack of proper consideration of how this would affect transport infrastructure requirements suggests an approach which could lead to the detriment of local character and could put unnecessary strain on existing infrastructure. Part B of the Policy refers to the density of development proposals being based on the provision of future planned levels of infrastructure rather than existing, which is welcomed in theory. However, this would rely on publication of anticipated PTAL levels associated with infrastructure improvements such as Crossrail 2 and similar which is crucial to determining appropriate densities. Such information is absent and is a crucial omission from the Plan which would enable the Council to plan for appropriate densities if provided.

Object to the principle of considering back garden land for housing development as would be what the Mayor is considering when reeving to optimising housing density linked to Policy H2 Small sites. Wandsworth has exceeded its housing targets and provided housing at high densities whilst retaining amenity space standards,

Clarification of Point C of the Policy is sought as to what the Mayor means by the wording 'the higher the density of a development, the greater the level of scrutiny that is required of its design'. This stance seemingly places more emphasis on scrutinising design for higher density development but it is considered that all development should be scrutinised proportionally to the highest standards.

Where schemes are required to be referred to the Mayor because they exceed the density parameters set out in D6 C, this should be limited to schemes of over a set amount of residential units which is suggested to be 50.

The additional information required for all major applications is supported.

Support for assessing infrastructure capacity as a key element in determining the potential density that can be supported. However this will be critical to infrastructure delivery and will depend on whether criteria B can be successfully implemented with inputs from providers and the ability to assess tipping points and needs in advance of development proposals coming forward. This needs further clarity.

3.7. Policy D7 Public realm – Support

The Policy is supported overall. However criteria D7 D should stress the importance of creating pedestrian and cycle friendly spaces in identified areas such as town centres.

D7 H refers to incorporating green infrastructure into the public realm but the strategic urban design importance of London's Squares, Avenues and Boulevards (i.e. The Mall) is not explored.

D7 G refers to the Public London Charter. It is understood that the Mayor will be preparing guidance on this to set out the rights and responsibilities for users, owners and managers of public spaces. It is crucial that this will need to be prepared involving London Boroughs and a plethora of organisations involved in public realm matters.

3.8. Policy D8 Tall buildings - Object

The Council welcomes the plan led approach to defining what is considered to be a tall building, based on local context – local judgement regarding the location, impacts and heights of tall buildings is essential to good decision making. However, there has been a shift of emphasis in this draft policy, which the Council believe could result in inappropriate development. The policy is not explicit in its consideration of local character and places less emphasis on the consideration of local setting compared to the adopted London Plan. The policy is considered to be more promotional of tall buildings than in the adopted London Plan, particularly where these design considerations would mean that the siting of a tall building is inappropriate. The Council carefully plans its tall buildings to take into account local character and setting and would not wish to see the importance of these design considerations diminish. Previous Policy wording which considered local setting is lost; i.e. Boroughs being able to identify areas which are 'sensitive' to or inappropriate for' tall buildings in their local context. It is considered that local opposition to tall buildings could increase if the Policy weakens the need to be sensitive to local design considerations. The draft policy could therefore benefit from a more direct statement that tall buildings should not be considered where they would adversely affect existing character in locations defined by local evidence. By increasing emphasis on housing supply in design criteria local democracy is at risk of being undermined by not taking into account the local context.

The draft policy also emphasises the role of tall buildings – and specifically the height of the building (see Part B2) – in contributing to the increased housing figures identified elsewhere in the Plan. While the Council acknowledges the necessity and challenge of accommodating London’s expected growth, this emphasis on additional height to support new housing should not weaken other policy objectives and careful design and place-making considerations, which could risk undermining the support new housing.

It is considered that the policy wording should also take into account the local character of the existing area in the consideration of the impact of tall buildings. Also, under 2 (functional Impact) in relation to design we would like to see the mentioning of ‘active design’ to encourage and provide opportunities for physical activity movement in such buildings for the workforce in context of health and wellbeing.

3.9. Policy D9 Basement development – Neutral

The Council considers Policy D9 to be unhelpful. The text following the Policy details problems that the construction of basements can cause in high density residential environments but the Policy does not contain any wording in recognition of the problem or how to deal with issues which arise.

3.10. Policy D10 Safety, security and resilience to emergency – Support

The Council welcomes the recognition of measures to design out crime which the Councils Local Plan supports.

3.11. Policy D11 Fire safety – Support/Neutral

The rationale for the new policy on Fire safety standards is understood and the Council wouldn’t disagree with importance of fire safety; but this goes beyond the remit of planning and is already dealt with via Building Regulations; there is a danger that new fire safety requirements within planning will require new skills by case officers and could potentially delay the planning application process, particularly if Fire Statements have to be verified. The policy creates legal uncertainty of refusing an application without a Fire Statement as this is considered under a different legislative framework.

The Policy is already covered under the Building Regulations part B - B1 Means of Warning and Escape, B2 Internal Fire Spread (Linings), B3 Internal Fire Spread (Structure), B4 External Fire Spread and B5 Access and Facilities for the fire service. Additionally, the Regulatory Reform Fire Safety Order (2005) requires premises to have a fire risk assessment provided by a competent person which can be produced on demand for the fire authority and relates to the occupation of the premises which can also address the fire strategy, specific design details and operating factors presented by the occupation of the premises. Part B1 will also address (along with the RRO) specific evacuation plans for the disabled in addition to the facilities for evacuation required in the design under part B1.

The Building Regulations and allied legislation already addresses these issues in depth and the inclusion as a policy is unnecessary as it is covered by the Building Control Body.

3.12. Policy D12 Agent of Change – Support

Placing the onus of noise mitigation on the new noise-sensitive development is welcomed and further guidance is sought as to appropriate mitigation measures and how these can be secured through planning agreements if required.

3.13. Policy D13 Noise – Support

No comment

4. Chapter 4 Housing

4.1. Policy H1 Increasing housing supply – Object

The Council has a good record of housing delivery, achieving its target and as a result, this year received the second highest award from the New Homes Bonus. However, the new housing target of 2310 units is considered unrealistic.

The large sites component of the figure is forecast to be achieved and is supported. The small sites element of 774 units is unrealistic and the methodology and assumptions made to arrive at the small sites figure are objected to by the Council.

In terms of the small sites model, the 1% development rate of existing houses per year stated in para 6.22 of the SHLAA is provided without justification, other than it being ‘a reasonable estimate’. A reduced growth rate in conservation areas is supported but the 0.25% stated at para 6.28 of the SHLAA is similarly not provided with any justification.

Historic development rates in Wandsworth in the areas covered by the small sites model have been much less than this.

The economic viability of the development anticipated through the model has not been tested at the assumed rates of development. Viability and development rates may change over time as the easiest sites to develop are developed, and future, more challenging sites to develop are developed later and at greater cost.

Given the significant increase the small sites methodology makes to the small sites housing target for Wandsworth (774 dwellings per year under the proposed model approach compared to 460 per year under the traditional windfall assessment approach), the development rate assumptions in it should be more carefully investigated and justified before the outputs are included as targets in the London Plan. The GLA should consider comparing growth rates between boroughs and over time, as well as testing the economic viability of the development proposed through the model and the small sites policy.

Overall, the penalties are severe if housing targets cannot be delivered, ranging from the risk of failing local plan examinations, losing the Government’s proposed housing need methodology ‘capping’ allowance, no increase in planning fees, housing delivery test penalties, planning by appeal if a 5 year housing supply cannot be demonstrated, associated risk for new homes bonus reduction (under the proposed methodology) to speculative development and risks under the designation regime. Boroughs caught up in a

cycle of unachievable targets and consequent under-delivery will be penalised severely and positive plan-led development and resources for planning services will be impacted.

Minimum space standards for housing are welcomed. There are also concerns around loss of family housing as stated in the Plan by stating that boroughs should not set prescriptive dwelling size mix requirements for market housing and a move away from considering family units as three or more units – which there continues to be an evidence need the Borough; London Plan policies still need to allow Boroughs to develop their own evidence base on housing needs and mix.

The approach to ‘Good Growth’ principles is generally welcomed, but the Plan does not tackle and deal with the supporting infrastructure (e.g. education, health, transport, etc.) that is required to support the substantial increase in housing units and population. The approach to securing the infrastructure needed to support the increase in housing units and population lack depth and coherence – a detailed strategy is required to realise the housing and growth aspirations.

The Plan acknowledges that there is a significant funding gap to support growth yet without a detailed strategy it is unrealistic to expect Good Growth to be achieved. It is considered that such a strategy should be set out by the Mayor in liaison with relevant stakeholders such as Local Authorities, NHS England and the Education and Skills Funding Agency; otherwise pressure on locating the supporting infrastructure necessary to accommodate growth will be further exacerbated on inappropriate locations such as designated open spaces.

The London Mayor may wish to increase density and capacity but there will be a level of residential development which is dependent on pan-London transport improvements and unless these are delivered, residential capacity cannot be effectively realised. The promotion of higher housing densities around transport hubs and in town centres is generally sensible, however, the delivery of jobs and other social and community infrastructure has to have as much priority as the provision of housing in order to achieve ‘good growth’.

The overarching aim of delivering these extra homes is to increase stock and thereby affordability for Londoners. However, the population projections used in the London Plan are trend based and therefore reflect market conditions and demographic data of recent years, including declining birth rates. If living in London becomes more affordable, the number of people who choose to stay rather than migrate out when starting families will increase. And this will undoubtedly impact on the type and scale of associated infrastructure requirements. If affordability improves, the balance would likely shift to a need for larger units and the trend data underpinning demographic changes would also shift. If the Mayor’s demographic projections don’t allow for a change in demographics as a result of more affordable housing, account won’t have been taken of the necessary infrastructure requirements e.g. more families = more schools. These factors must be considered in a detailed supporting infrastructure strategy which the plan currently lacks.

4.2. Policy H2 Small sites – Object

The Council raises serious concerns over intensification and assumptions made in existing residential stock, and the new policy on the presumption in favour of small developments. Policy H2 – (B2). Wandsworth has 45 conservation areas each with their own Conservation Area Appraisal management strategy. Given the significant coverage of conservation areas in the borough and the duty to preserve or enhance, it would be unrealistic to promote increased housing and densities by means of area-wide design codes. The policy could be improved by reference to the significant coverage of conservation areas in London and CA appraisal strategies in establishing relevant densities/built form and grain and sympathetic design.

The policy is based on a fundamental transformation in how new homes are delivered, including the Mayor’s Housing Strategy, however aside from a general presumption in favour of small housing development (when there already exists a presumption in favour of sustainable development as set out in the NPPF) there are no real mechanisms that will increase delivery to the extent of the borough target. Redevelopment and conversions cannot be viable where there are such existing high value land uses across many parts of the borough.

D (2) Object to the unqualified reference to residential conversions – there is a need for a balanced approach including offering choice and rebalancing the housing stock in a borough where high volumes of new homes are being completed in smaller unit sizes. This could also mean loss of a number of registered and more affordable HMOs to smaller and more expensive self contained flats. The Councils local evidence and Local Plan Policy should continue to apply to restrict residential conversions appropriately.

4.3. Policy H3 Monitoring housing targets – Neutral

No comment.

4.4. Policy H4 Meanwhile use – Support

Meanwhile use is supported, however it maybe useful that there is flexibility on openspace standards given the temporary nature of the use.

4.5. Policy H5 Delivering affordable housing – Support

Supportive of this policy approach however criteria A4 must recognise that on estate regeneration schemes, given the commitment to replace existing social rented stock there may be viability challenges in achieving a 50% target. It must be recognised that each estate regeneration project will be impacted by the level of leaseholder buy backs and promises to these owners in relation to levels of equity offered. Clarification should be contained in the policy as to the financial appraisal approach taken to assess the levels of affordable housing to be delivered. There is a risk that the Mayor could take an arbitrary approach in intervention on referable schemes which are not defensible if schemes have to be considered again such as seeking S73 changes or such changes relating to the original approval.

4.6. Policy H6 Threshold approach to applications - Neutral

The Council supports the thrust of the policy, however the Council's current policy for affordable housing is to request a viability appraisal where less than 50% affordable housing is being proposed. Minimum percentages are expected of 33% for the borough and 15% in the Nine Elms Opportunity Area. This locally derived expectation level is slightly below the 35% proposed.

Whilst it is acknowledged that if an applicant was intending to submit a scheme which is below the 33% expectation level it may help push the applicant to reconsider a higher level of affordable housing if an incentive of not requiring a viability appraisal or end of scheme review is set. However, if an applicant submits a 35% affordable scheme in accordance with the Mayor's approach, with no viability appraisal, the Council would not know whether a higher level of affordable housing than the 35% threshold could be achieved. In addition the 35% threshold assumes no public subsidy, so without a viability assessment the Council would not be able to determine whether grant input would increase the affordable quantum above 35%. The feasibility of the approach to requiring 35% affordable housing is questioned as the high land values in Wandsworth may mean that this approach is not taken up due to viability reasons.

The proposed threshold of 50% affordable housing in industrial areas which have been redesignated is broadly in accordance with the Local Policy as stated above but the Council questions why flexibility could not be included as part of the Mayors threshold approach of perhaps a more realistic incentive of 35% level used if there is evidence of local circumstances where the 50% level would be unviable – such as possible land contamination or the requirement to intensify industrial floorspace on such locations. There is a risk that there could be a detrimental effect on the quality and quantum of industrial floorspace achieved with a higher expectation for affordable housing in these areas. This is particularly pertinent in Wandsworth which has been reclassified to a 'provide industrial capacity' from 'restricted transfer' for industrial land making it more important to implement increased levels of industrial floorspace in the areas proposed to be redesignated as set out in the Borough's proposed Local Plan - Employment and Industry.

4.7. Policy H7 Affordable housing tenure – Neutral

It would be helpful if it was clearer that the 40% decided by the borough was at the discretion of the borough, as long as local evidence demonstrated the need, and that the fast track process could then apply. The current wording will cause confusion for applicants, who offer 35% affordable housing with a minimum of 30% London Affordable Rent (low cost rent) and in accordance with the parts 1&2 of Policy H7, as to whether they would be eligible for the fast track process. This is a matter which should be left to the Council to determine taking account of local planning policy and site circumstances. There should be more scope therefore to allow boroughs to determine a tenure mix that would deliver the optimum affordable offer and bring development forward. Concern is

also raised regarding the loss of family homes and excessive level of one bedroom units proposed.

4.8. Policy H8 Monitoring of affordable housing – Neutral.

The Council supports the policy but flexibility should be offered on the level of monitoring detail required in the short term to give the opportunity for the Council to adapt its monitoring process to ensure more detailed reporting in the longer term.

4.9. Policy H9 Vacant building credit –Support.

Welcome the stricter assessment of when VBC is applied and the evidential test required.

4.10. Policy H10 Redevelopment of existing housing and estate regeneration - Neutral.

The London Mayor may wish to increase density and capacity but there will be a level of residential development which is dependant on pan-London transport improvements and unless these are delivered, residential capacity can not be effectively realised.

The impact of intensification on existing communities can be perceived to be and may be significant so it is not just about transport but necessary social infrastructure being in place.

The London Mayor should be clearly supportive of estate regeneration where accommodation and environment is poor, there is opportunity for intensification and a consensus has grown that Estate Regeneration is the best option.

Estate Regeneration is primarily a matter for councils and social landlords to determine in consultation with their residents.

Clarification is required in Part A and C of the Policy with the term “with at least” the equivalent level of floor space. In some cases this may not be achievable and it would be prudent to refer to the floor space standards for new housing as set out in the Housing SPG. To ensure LPAs deliver housing at higher densities applying floor space standards used in the past may result in the inefficient use of previously developed land. The assessment of density and the optimisation of development sites needs to be set within the local context whilst taking into account other often competing environmental considerations.

Part B of the policy is supported subject to comments on floor space re-provision in response to Part A. Part C of the policy re the re-provision of affordable housing should, in respect of tenure, should also reflect Local Housing Need in line with Para 4.10.5 of the Plan.

The regeneration and intensification of London’s housing areas as a key part of the evolution of London as set out in Paragraph 4.10.1 is supported, existing housing estates in regeneration areas generally do not make the best use of land and can usually be developed at higher densities.

The aims of an estate regeneration project set out in paragraph 4.0.2 are supported however it is suggested that they may also include ‘maintaining and improving social cohesion and inclusion for existing and future communities.’

It is suggested that wording is included to ensure that the health and wellbeing of residents is considered in redevelopment schemes. Reference to the consideration of Health Impact Assessments for schemes could be included to identify negative impacts and opportunities to mitigate.

As set out in paragraph 4.10.3 where regeneration includes the loss and replacement of homes the Council supports the wording that schemes are delivered with existing and new residents and communities in mind. It is considered by the Council that the heart of estate regeneration should be the well being and future needs of existing residents.

Paragraph 4.10.4 states that it is important to ensure that estate regeneration does not lead to the loss of affordable housing and that it delivers uplift in affordable housing where possible. This aim is supported and also that other costs such as the provision of community facilities is taken into account in a viability appraisal. The Council also supports paragraph 4.10.5 on the scope for re-providing a different mix of affordable housing for estate renewal schemes as long as the overall level of provision is maintained across the programme.

4.11. Policy H11 Ensuring the best use of stock - Support

Whilst welcoming this principle of reducing the levels of empty homes, the Council would like to see clarification that older residents who may temporarily leave their homes, to assess residential or other types of accommodation offers, are not penalised by this approach.

4.12. Policy H12 Housing size mix - Neutral

The Council welcomes this policy, however, noting some concern in relation to H12 C in so far as the Council has an Intermediate Housing Policy statement that seeks to ensure a range of accommodation at different price points to meet the needs of their residents and local workforces. Therefore some control needs to be recognised in relation to the intermediate units provided as well as the social rented homes. There should not be any diminution of a Council position where local income ranges were not taken into account when establishing affordability for a range of incomes including London Living Rent. The Council would also use Section 106 agreements to determine local marketing plans and cascade arrangements. Parts A1 and A2 appear to contradict Policy H2 particularly in respect of reducing pressure on conversions and delivering high density small units in good PTAL areas. Part B and C could be improved by advocating a local approach and having a specific policy on controlling 1 bedroom units.

4.13. Policy H13 Build to Rent - Neutral

The Council is supportive in principle of Build to Rent. However there would be concerns where large scale Build to Rent developments are proposed as to their impact on local amenities, infrastructure and existing residents. We believe that it should be the LPA that determines the suitability of such development in different areas of the borough, as clearly

some sites would be better suited to the needs of a more transient population. The Council requests clarification that build to rent is C3 use and not in any circumstances C2 use unless designated for particular purposes – as a Care Home facility or student residences where there is an identified need and an educational institution identified who will use the spaces.

The criteria provide a useful and consistent approach across London, however the policy should not preclude assessment on a case by case basis if a better outcome could be delivered.

4.14. Policy H14 Supported and specialised accommodation – Support

The Council welcomes a strong statement on the need for supported accommodation. This must be adequately financed given it is often small scale and therefore difficult to financially stack up. Furthermore this is also reliant on adequate revenue funding streams that are currently the subject of national consultation. In terms of pan London delivery, this has always been challenging when people with high level support needs are moved away from family and support networks. Furthermore, when public bodies seek to disinvest from one area without fully addressing the social infrastructure needs of that area in terms of replacement provision this will cause local difficulties. Whilst the Council may broadly support and acknowledge that there is a level of modernisation required in the sector (moving away from conversion properties in some instance to more bespoke and adaptable housing) this should not be at the expense of local provision.

4.15. Policy H15 Specialist older persons housing - Part support /part object

As the population ages it is important that there is specialist accommodation available in particular residential nursing care including end of life/hospice care and dementia care. However it is critical that such supply is linked to identified need in the boroughs. Further such accommodation should not be hidden away but need to be well connected to localised facilities to enable residents to have access to social infrastructure, shopping, health care and public transport facilities.

In relation to H15 A1 the Council disagrees with the methodology behind the benchmarks for older people's housing detailed in table 4.4. The GLA Plan fails to address migration and the housing available in adjacent areas, some of which are not in the GLA boundary.

Object to part B (i) as an affordable housing requirement will be onerous and may affect delivery, or make the cost of care unaffordable to the older person especially where care is delivered by adult social services or similar. However this requirement is supported for retirement living-type accommodation.

More clarification and justification is required for use class definition and is C2A and C3(b) uses should be addressed. Policy should better reflect the UCO/ case law on determining C3 and C2 uses.

Any C2 applications should only be considered in the light of local housing evidence for them. They should be strongly resisted where there is no proven need for the accommodation and the application is merely a vehicle to by-pass affordable housing obligations. There should always be an assessment of the relevance of the accommodation offered by social care and health services.

4.16. Policy H16 Gypsy and Traveller accommodation - Object

There is no rationale for the London Plan adopting a new definition, different to the national definition, particularly as the Plan leaves the boroughs to undertake local assessments.

Without new burdens funding to carry out a review of the Councils Gypsy and Traveller needs assessment, there will not be the capacity to undertake this level of newly defined extensive assessment. The change in definition will require far more intensive work to assess.

4.17. Policy H17 Purpose-built student accommodation - Neutral

Whilst the Council recognises the importance of student accommodation to support educational establishments, we would expect these institutions how they have researched the local market to identify local accommodation and to evidence the need for new build. Support for BPSA would be subject to consideration of Community demands for other forms of affordable housing in the area. Any student accommodation developed must be linked to an educational establishment – the SHMA would not consider student accommodation so any application bought forward must meet very specific requirements – locally evidenced for local institutions and not at the expense of mainstream provision to meet identified housing needs.

Concern that implementation of Part A (4) could be complex –for example factoring in occupation by foreign students, availability of scholarships, sponsorships, grants and bursaries etc on affordability, subsidisation of students is best carried out by the educational establishment or local education authority on an individual basis rather than on the housing stock

5. Chapter 5 Social Infrastructure

5.1. Policy S1 Developing London’s social infrastructure – Support

The Council welcomes the overall approach to developing London’s social infrastructure. With the increase in population and housing, there will be an increased pressure on social infrastructure. It is important that future needs are fully planned and that the required increase in in demand for health, education and recreation facilities can be fully met at all times. The general approach to social infrastructure and its protection through policies is welcomed. However it is noticeable that the Mayor places the onus on addressing the need for additional or improved facilities clearly at the Council’s door. The London Plan would benefit from further clarification about the evidence base to ensure other forms of social infrastructure are explored, such as through realistic marketing. There is a need to ensure that public sector land disposals have regard to development plan policies; wider infrastructure investment beyond the borough cannot override local priorities.

5.2. Policy S2 Health and social care facilities -Support

The Council supports the policy as it provides continuity from the previous London Plan. Under Section B of the policy we would recommend that development proposals should consider flexibility in context of design to facilitate new models of care which may emerge over time.

5.3. Policy S3 Education and childcare facilities – Part object

General concern about increase in housing population without a coherent strategy on increase in social infrastructure, including physical infrastructure particularly schools. Careful consideration should be given to assess whether such facilities should be located away from areas of high air pollution including busy roads. Air pollution has negative impacts on the health and wellbeing of children including lung development as well as onset of asthma. The Mayor cannot influence the Education and Skills Funding Agency's decisions.

The Council supports the added level of criteria to take into consideration for education development proposals and the requirement for local authorities to consider demand, and plan for need.

5.4. Policy S4 Play and informal recreation - Support

Development of such facilities should also consider environmental impacts including air pollution and road severance.

5.5. Policy S5 Sports and recreation facilities – Support

Welcome the policy to ensure an adequate supply of sports and recreation facilities.

5.6. Policy S6 Public toilets – Neutral

The principle of the policy is supported as there has been significant closures of accessible public toilets across London this has had detrimental impacts on the elderly, those with disabilities and parents with young children. However, the Council questions the strategic nature of this policy.

5.7. Policy S7 Burial space – Support

No comment.

6. Chapter 6 Economy

6.1. Policy E1 Offices – Support

The Council is supportive of Policy E1, noting in particular the impact of Permitted Development Rights and how this has led to significant supply issues for companies seeking space in this area which has historically been a source of affordable space. The Council's emerging Local Plan – Employment and Industry Document (LPEID) is in accordance with the policy, in particular criteria D which will protect the identified office locations and other protected office clusters as Employment Protection Areas.

A non-immediate Article 4 Direction was issued on 11 May 2017 for Wandsworth Borough Council for identified office locations. It is proposed that subject to confirmation of the Direction that it will come into force 16 May 2018. The Plan's support for Councils to be able to introduce Article 4 protections in such areas is welcome. Support the balanced approach between residential and employment for the VNEB Opportunity Area which is appropriate for meeting place-making ambitions. Note that planning intervention may need to be somewhat counter-cyclical to market trends to ensure this long term objective is met.

The strategic approach set out in policy E1 continues to protect the successful industrial areas and re-designate some sites for mixed uses. These sites have the potential to provide through consolidation increased industrial floorspace and provide residential uses as well as business floorspace (including offices) for SMEs to further support the borough's economy. This approach is in accordance with the Council's emerging Local Plan (LPEID).

The Council's emerging LPEID supports and encourages the provision for start-up businesses and other SMEs within the borough through economic development providing managed and affordable workspace. It also sets out the requirements of new economic development to ensure flexibility of space to improve the competitiveness of office space of different sizes.

6.2. Policy E2 Low-cost business space - Neutral

Given the supply issues generated by Permitted Development Rights, high relative residential values and other reasons, the Council welcomes the Plan's support to encourage a range of business space in terms of affordability and flexibility. We note that the market is responding to this in many ways but it remains important for Local Plans to establish a strong policy position on this in order to meeting growing and changing business needs.

Object to the seeming inflexibility of the policy in regards to limiting the policy options to protect B1 space to an over-simplistic area based protection approach. The policy should also contain provision for alternative approaches of meeting demand for low cost business space which would enable Councils to develop their own Local policies backed by local evidence as part of a Local Plan review. This would then enable Councils to take into account the whole picture to assess the supply and demand for low cost business space instead of protecting all B1 use – unless there is a local evidenced need. Related to this, clarification is sought on what is meant by 'areas' when considering the identification of areas of lower-cost space. The Council has considered all of its supply of office use as part of the Local Plan – Employment and Industry Document and has identified additional employment protection areas based on criteria of a site being well located, if they form a cluster of employment uses and contribute to the economic vitality and viability of an area.

New business creation and the development of supportive clusters in developing economic sectors have been essential to supporting London's and Wandsworth's adaptability and

growth. Therefore welcome the policy to provide a certain element of affordable space for start-ups as this type of space has often been subject to the harshest supply constraints.

6.3. Policy E3 Affordable workspace – Support

The Council supports the work the GLA has done in advancing the understanding and prioritisation of arts, culture and the creative industries in recent years. This ‘new level of ambition’ for culture needs to be reflected throughout the London Plan to ensure that local authorities make provision in planning policy to build arts, culture, heritage and the creatives industries into development across the city. Not doing so will result in cities which risk not providing for residents’ cultural lives, and do not support and grow the creative industries across the city.

Welcome the recognition of the need to include affordable workspace in to development schemes. The Council’s Local Plan – Employment and Industry Document identifies policy to secure an element of affordable workspace on site.

Affordable creative and cultural workspace should be supported whether within an identified (or GLA funded) CEZ or not, or risk deprioritising this provision outside of CEZs.

6.4. Policy E4 Land for industry, logistics and services to support London’s economic function - Support

Supportive of protection and/or suitable adaptation/intensification of industrial sites. The sites suitable for intensification have inherent economic value which has been identified in the Council’s Local Plan – Employment and Industry Document (LPEID). Realising this potential will require a mix of protective and adaptive policies, supporting reinvestment and intensification as appropriate which the LPEID supports. Support a pro-active approach to industrial areas to realise this which is reflected in the LPEID. Part of innovation might be to permit some flexibility in types of use reflecting modern use of industrial buildings, including flexibility in how different uses – storage, workshop, offices, etc. – might be incorporated within a single building.

The LPEID has identified SIL, LSIA, EUIA and EPA (example of what would be categorised as a non-Designated Industrial site as set out in draft London Plan Policy E4.B(3)) designations to meet the boroughs needs. In accordance with evidence from the ELPS the LPEID re-designates some employment areas and identifies the provision of increased capacity of industrial floorspace and the LPEID expects no net loss of existing floorspace on all sites in the SILs, LSIAs, EUIAs and EPAs. The evidence base for the draft London Plan has now categorised Wandsworth as ‘Provide Capacity’ the intention being to seek to deliver intensified floorspace and it is considered that this is what the LPEID sets out to deliver.

6.5. Policy E5 Strategic Industrial Locations (SIL) – Neutral

Support the need to protect the SIL as the main reservoir of industrial, logistics and related capacity. The Council cautiously welcomes the approach to intensification in the SIL. However, this approach also relies upon boroughs providing a much more detailed review of its industrial areas than has been previously undertaken and are used to, including possible environmental and design considerations, which could prove further resource

intensive akin to a full master planning exercise which the boroughs would have to resource. The approach would place further importance on implementation and analysis of current floorspace to ensure a development intensifies the floorspace in accordance with policy to ensure the correct type of floorspace is being developed to meet local and London-wide needs. The Council suggests that intensification is more suited to Locally Significant Industrial Sites as opposed to the main Strategic Reservoir of the Strategic Industrial Locations. It is noted that table 6.3, includes an expanded SIL area that extends the existing North Wimbledon SIL, across the borough boundary to incorporate Garratt Business Park in this borough, which was previously designated as a LSIA. The added protection that this could bring to this important industrial area is welcomed, but there is concern that a large part of this SIL, contained in the Weir Road Industrial estate is earmarked as a depot for the proposed Crossrail 2. The future loss of that area must not adversely impact on Garratt Business Park.

6.6. Policy E6 Locally Significant Industrial Sites - Support

Support the continued approach to identifying Locally Significant Industrial Sites in Local Plans and the approach to considering intensification as long as there is a clear evidence base to do so.

6.7. Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function – Support

The overall approach is welcomed notwithstanding comments on intensification within the SIL. The Local Plan – Employment and Industry sets out an approach to protecting non designated industrial sites (Employment Protection Areas) where they are in appropriate locations and form a cluster which enables benefits from agglomeration effects, supplying each other and realising economies of scale for servicing and other operational requirements. Protection of non-designated sites is supported where it is evidenced that there is continuing demand. In Wandsworth, the continued demand for industrial premises, and the limitations on supply of industrial land require protection of smaller industrial areas and premises, including businesses located within railway arches along side the main strategic reservoir of industrial land. The Council would emphasise the importance of an up to date evidence base to determine the level of flexibility of uses within SILS and LSIS to enable a local evidence based approach to be applied.

6.8. Policy E8 Sector growth opportunities and clusters – Support

Supportive of the sector/clustering concept as a means of framing development of key employment/industrial locations as set out in earlier employment policy. This could perhaps be framed as an overall concept that can be applied to local areas rather than limited to the geographic locations or the Strategic Outer London Development Centre (SOLDC) concept as the chapter implies. For example, Wandsworth would wish to promote Battersea as an emerging design/technology cluster emerging from investments by the Royal College of Art and Apple. A similar concept could apply to Wandsworth Town's role as a centre for the music industry.

6.9. Policy E9 Retail, markets and hot food takeaways – Support/Neutral

Support the plan-led approach to identifying retail requirements in Part B. Support the Policy which recognises need for adaptation to reflect structural change in the retail sector and to support thriving local town centres. Recognition and support for markets is noted and welcomed. The markets have a particular importance in Tooting where Tooting Market is currently threatened by Crossrail 2 proposals. It is trusted that the Mayor ensures that there is minimal impact on the Tooting markets when considering any proposal.

Welcome the principle of controlling hot food take-aways as the Council already has a similar policy. However, the strategic nature of this policy is questioned as the Council is already exploring this issue with its own Local Plan policy.

6.10. Policy E10 Visitor infrastructure – Support

Welcome the approach to supporting the location of hotels and serviced accommodation within town centres and the CAZ.

The aim of the policy could be improved by the requirement to seek planning permission for rentals of more than 90 days p.a. stated in paragraph 4.11.2 becoming a policy criterion either in Policy H11 or Policy E10 (f).

6.11. Policy E11 Skills and opportunities for all - Support

The Council welcomes the Plan's support that developments should seek to maximise training and employment opportunities, including through S106 agreements. Wandsworth has sought to address the concerns raised in this chapter through an Employment and Skills Plan process that allows specific opportunities to be aligned with build programmes and employer practices to maximise benefit for both employer and individual. It should be noted that S106 obligations are the responsibility of the landowner and therefore responsibility for training and apprenticeship completions lie with them (or through them with their supply chain). Employment and training practice in the construction industry has not been of a consistent quality and can sometimes fall short of the aspirations the Council has for its residents. However, the Council recognises that successful S106 Employment Agreements must contain sufficient flexibility to align with industry practice and employment needs and welcomes the GLA's strategic level work with the industry to improve the development of the London workforce. Wandsworth has been instrumental in developing a cross-borough approach in Employment Agreements, first with LB Lambeth for developments in VNEB and then with Central London Forward through its Construction Careers initiatives. Further support to allow such cross borough working to be reflected in S106 agreements would be supported, whilst recognising the legal basis of mitigating the impacts of local development. Although the Plan's focus on the employment and skills opportunities through development is welcome, this chapter feels somewhat limited as a response to the wider employment and skills agenda. For example, the importance of providing a range of training facilities, ranging from specialist facilities supporting London or sub-regional strategies to smaller local facilities, accessible to those who may be further away from the labour market.

7. Chapter 7 Heritage and Culture

7.1. Policy HC1 Heritage conservation and growth - Support

Welcome the recognition of the importance of the historic environment by keeping an evidence base. The Council has used its evidence base on heritage assets to inform the guidance in its Historic Environment SPD which is now adopted following public consultation.

7.2. Policy HC2 World Heritage Sites - Support

Wandsworth is partner borough in managing the Westminster World Heritage Site. Policy HC 2 is supported. However, reference could be made to the use of 3D modelling to support protection of views which is set out in Policy D2 C and discussed in paragraph 7.2.3. The use of 3D modelling was a Recommendation No. 13 of the UNESCO mission report 2017.

7.3. Policy HC3 Strategic and Local Views – Support

Policy HC 3 is supported including a review of the London View Management Framework in HC 3 E. Wandsworth has identified important Local Views in its adopted Local Views SPD.

7.4. Policy HC4 London View Management Framework – Support

No comment.

7.5. Policy HC5 Supporting London’s culture and creative industries - Support

The policy supports the current approach in Wandsworth that the Council would want to see maintained. The creative sector is an important and growing part of the Wandsworth economy. The Creative Enterprise Zone (CEZ) concept is welcomed but seems a little isolated from the relevant employment policies which should be referenced. CEZs are also currently a GLA programme with funding attached and it is unclear whether their inclusion in a Local Plan is a requirement of this funding or whether the local planning authority can choose to make such a designation. Whilst the co-existence of cultural facilities and creative industries is often of fundamental importance, it is important to understand the distinction between the two as the former will invariably operate to a different business model than a mainstream enterprise. The London Plan should enable creative enterprise and clustering to be supported and encouraged outside of formalised CEZs. Also provide support for cultural and creative enterprise and facilities, which do not form part of a localised strategic cluster, whether or not this is a CEZ.

The Council supports the protection of “existing cultural venues, facilities and uses” and propose the GLA consider how creative industries can be offered similar protections. Currently creative business is being pushed out of many parts of London through redevelopment and rising rents. Whilst clustering is attractive and offers varied benefits, cultural venues and facilities are not always clustered and may exist in varied corners or centres of a borough, successfully serving local and wider communities and attracting footfall which supports other local business. This should be acknowledged as valuable.

The London Plan should make facility for creative enterprise and clustering to be supported and encouraged outside of formalised CEZs. It should support cultural and creative enterprise and facilities which do not form part of a localised strategic cluster, whether or not this is a CEZ.

7.6. Policy HC6 Supporting the night-time economy - Support

The recognition of the night time economy and some of the means of managing its impact is generally welcomed. However, the policy is mainly concerned with promotion of the night time economy and the Council considers that the wording should also recognise the importance of pro-active management plans in considering the possible negative impacts to ensure clarity on the management of possible conflicts. Clapham Junction is identified as having a night time economy role of regional/sub-regional importance with Putney & Tooting of 'more than local' importance but there is a lack of clarity as to what this means in practice and why Wandsworth Town is not recognised.

The Mayor has also recently consulted the Council on his Night Time Commission's future of London's night time economy. It is considered that the draft London Plan should have already been front loaded with evidence on the night time economy so that the Council could adequately respond to a policy stance. Given the Commission's findings won't be heard until late in 2018 consideration of any policy steer will not fit well into the Plan's development and any changes to policy would not have been considered by the Council until very late in the plan process

7.7. Policy HC7 Protecting public houses - Support

The policy for protection of London's public houses is welcomed albeit the Council has taken the lead in London - protecting its public houses by already introducing a public house protection Article 4 Direction which has ultimately led to changing the national regulations to remove permitted development rights for public houses. It is considered that the permitted development right changes put the onus on Councils to establish an evidence base to protect its pubs where they consider necessary to do so without the need for a strategic policy on this matter.

8. Chapter 8 Green Infrastructure and Natural Environment

8.1. Policy G1 Green infrastructure - Support

Welcome but to accord with the NPPF para 109 suggest the addition of 3) identify opportunities to provide biodiversity net gain through green infrastructure interventions.

8.2. Policy G2 London's Green Belt – Neutral

The Council welcomes the principle of the protection of green belt land but questions why the Mayor has not undertaken a review of the greenbelt to potentially accommodate part of London's housing capacity target. A review could tie in to the good growth principles and look at possible sites which have low environmental quality as possible development sites. See further comments made on policy GG2.

8.3. Policy G3 Metropolitan Open Land and Policy G4 Local green and open space – Support

The Council welcomes the protection of MOL and local green and open space. However the Council urges the inclusion of the phrase “publicly accessible” to this statement e.g.: “ensure that future publicly accessible green and open space needs are planned for in areas with potential for substantial change “. Criteria E2 should include reference to maintenance which is paramount to their success.

8.4. Policy G5 Urban greening - Neutral

Supportive, however the functionality of Urban Greening Factor would need to be trialled and assessed to see if it suitable for Wandsworth. The wording in paragraph 8.5.1 is stronger than the policy wording. The policy wording should be strengthened to reflect this e.g. “G5A Major development proposals should ensure GI is integral to site planning and building design as it is fundamental to the greening of London. This can be achieved by incorporating measures such as high-quality landscaping (including trees), living roofs, living walls and nature-based sustainable drainage.”

The Council considers there is an omission in that there is nothing set out in Chapter 8 to direct Local Authorities to capture/report data on public open space loss, gain or enhancements through the implementation of policy. This would contribute to measuring the effectiveness of the success of the Mayors long term target to make more than 50% of London green by 2020.

8.5. Policy G6 Biodiversity and access to nature - Neutral

The Council is concerned that Policy G6 is weaker than current Local Plan Policy and wording. Suggest the inclusion of reference to the mitigation hierarchy as per NPPF para 118 e.g. “Sites of Importance for Nature Conservation (SINCS) should be protected. If significant harm cannot be avoided, adequately mitigated, or, as a last resort, compensated for then planning permission should be refused. The greatest protection should be given to the most significant sites.”

It is considered that the wording would benefit from including text on management and maintenance in perpetuity.

Regarding paragraph 8.6.3, corridors should include Green, blue and dark and also refer to creating/enhancing/protecting corridors between sites to help movement of species and genetic diversity of populations. Dark corridors are really important for bats and these should be identified and protected. Explicit reference should be made to “cumulative impacts” on SINCs alongside indirect affects. The biggest risk to SINCs in Wandsworth is the cumulative impact of successive small effects which individually are not of sufficient magnitude but over time are deleterious.

8.6. Policy G7 Trees and woodlands - Support

Urban woodlands have a huge demand on them from residents for social, health and education reasons. It is important to note that urban woodlands are very different from those in the countryside and need managing appropriately. An urban woodland cannot be treated like a countryside one with regards to management, they need to be managed

slowly and with plenty of resident/community liaison which means they cost more and take longer. This should be acknowledged. Again management is so important with these and wording should be included within policy guidance to ensure effective management.

G7A - a footnote should be added directing readers to the biodiversity action plan habitat suitability mapping for London in order that “appropriate locations” for new trees and woodland can be best identified without detriment to the potential for other, harder to create, habitats <http://www.gigl.org.uk/habitat-data/bap-habitat-suitability-data/#> .

G7B - a footnote should be added to clearly reference a definition for “veteran trees and ancient woodland” as this should also include “PAWS” sites which are often overlooked.

Omission of text to direct authorities to capture / report data on new trees and woodlands created through the planning process. This will be key to measuring the success of the Mayor's long term target to increase tree cover by 10 per cent by 2050.

8.7. Policy G8 Food growing – Support

Food growing is both good for the environment, mental health and education (e.g. teaching children about how food is produced as well as healthy eating. As a consequence it is important that existing allotments are protected and expanded as well as ensures that there are opportunities for community gardens in new developments.

Policy G8A does not make a distinction between community food growing spaces and allotments. These are different things and come with different long term security over their tenure and purpose. This distinction should be further considered and wording changed if necessary. Para 8.8.2 needs to draw a clearer distinction / better define a green roof for food growing as distinct from a living roof for biodiversity.

8.8. Policy G9 Geodiversity – Support

No comment

9. Chapter 9 Sustainable Infrastructure

9.1. Policy SI1 Improving air quality – Support

The Council supports the draft policy. Air pollution is of significant concern for health and wellbeing for all Londoners particularly for those who are more vulnerable; this includes school children, the elderly and those with illness such as asthma and Chronic Obstructive Pulmonary Disease.

The Mayor should be mindful that policy SI1 A6 may throw a large responsibility back on the Council to demonstrate “equivalent air quality benefits”. If the developer can't deliver emissions reductions on site, some other AQ benefits will be required off site. In reality this will usually mean that the local authority will be required to provide equivalent Air Quality benefits nearby through S106 agreements. This sets the bar very/unnecessarily high, may be unachievable and may result in S106 being repaid to the developer if challenged. The Mayor should consider revising the wording deleting “equivalent” to read: 6) Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site

measures to improve local air quality may be acceptable, provided that air quality benefits can be demonstrated. This will permit the Local Authority to ensure useful Air Quality benefits are achieved without the threat of any monies having to be repaid.

Para 9.1.2 - The Council applauds the Mayors intention to “ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits”. This is an admirable intention but is difficult to implement in practice. It will be difficult, unless in an Air Quality Focus Area (AQFA), to require that emissions from buildings are reduced to zero; it will be even more challenging to not “delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits “ as this is generally the local road network. Unless the new development is car free (and sometimes even if it is), major developments will almost always add to local transport emissions and thereby add to local NO2 exceedances.

9.1.1. Policy SI2 Minimising greenhouse gas emissions & Policy SI3 Energy infrastructure - Support

The Council supports Policy SI2 and SI3 which is in accordance with the Council’s Local Plan.

9.2. Policy SI4 Managing heat risk - Support

The Council supports the draft policy. People can feel discomfort from buildings that overheat. For example body temperature of older men and women is lower than that of younger people and that their tolerance of thermal extremes is more limited.

9.3. Policy SI5 Water infrastructure – Support

The Council supports Policy SI5 which is in accordance with the Council’s Local Plan.

9.4. Policy SI6 Digital connectivity infrastructure - Neutral

This is of relevance to the borough as a business location. However, it is unclear what this policy will achieve in practice. It would like current Building Regulations to be exceeded but offers no basis for actually implementing this. Achieving this objective will require industry rather than the planning system to implement and there should be more on what the Mayor will do to align Plan exhortations and delivery.

9.5. Policy SI7 Reducing waste and supporting the circular economy & Policy SI10 Aggregates – Support/Neutral

Support the circular economy to and waste reduction measures. Suggest using the words ‘more efficient’ rather than ‘fewer’ resources. Point 3 regarding the target of zero biodegradable or recyclable waste to landfill by 2026 should be qualified & clarified. Presumably this applies to all waste, not just household or local authority collected waste. How is “recyclable waste” defined? Does “zero” really mean “none whatsoever”? How would this be applied and enforced? How would any of London’s Waste Collection

Authorities (WCA's) still relying on landfill for residual waste, establish whether it contains any biodegradable or recyclable waste? In practice this could amount to the same thing as a complete ban on landfill for household and similar wastes as there is always likely to be at least some bio or recyclable waste remaining within it. Nevertheless as the borough becomes no longer reliant on landfill it is in a better position to be able to support a policy along these lines. There would always need to be a contingency permitted to deal with events such as plant/incinerator breakdown.

Regarding criteria 4a there is a risk that the Mayor may seek to amend proposed borough contracts if he thinks they are not in conformity with the 65% recycling target by 2030. This could potentially increase contract costs, but it isn't clear what household or commercial waste recycling rates the Mayor would require from Wandsworth in order to meet this. 65% recycling of household waste would be very difficult to achieve in London and Wandsworth. It isn't clear how much each borough would be expected to contribute towards the achievement of this target but it could be expected to increase external pressure on Wandsworth to introduce separate food waste collections for low-rise (despite an apparently weak case in terms of CO2 and potentially high costs) and to reduce the frequency of residual waste collections, to switch to small capacity wheeled bins for low-rise refuse and to introduce separate food waste collections for high-rise. Improved regulation of commercial waste management to improve compliance with pre-treatment, waste hierarchy & rules against mixing hazardous & non-hazardous wastes has the potential to greatly improve recycling rates achieved for other similar wastes.

Regarding criteria 4b WCA's have no duty to collect construction, demolition and excavation waste but the Council collects some via fly-tip clearance & some via the chargeable DIY waste service; as we deal with such a small part of the overall tonnage I doubt this target would really affect the Councils directly. However rules relating to charging for DIY waste might need clarification in order that it is clear that the disposal of such waste is chargeable.

Design criteria 5 is supported in principle with the possible exception of separate food waste storage provision in high-rise as the consistency agenda only goes as far as extending this to all low-rise. The plan could perhaps push high-rise to having food waste macerators instead (subject to water company support) which could result in significant disposal savings. The understanding is that this policy could have a real impact on the determination of planning decisions and therefore on developers' willingness to propose adequate arrangements. This may need to link to the consistency agenda so that developments are designed to cope with likely future collection service configurations. And if fortnightly residual waste collection for low-rise is to become the new norm, should the Plan require high-rise to be designed to cope with this? There are many new residential units that are very limited in terms of space and therefore the pressure to build in space for recycling may conflict directly with pressure to accommodate more living units.

Criteria B1 aiming for zero waste is not consistent with the 95% target stated in 4B for demolition waste.

In Criteria B3, opportunities for managing as much waste as possible on site Food waste macerators could be encouraged as could home composting provision in gardens and small scale Anaerobic Digestion in larger developments to deal with food waste on site. Criteria B4 on adequate recycling storage space is supported but it should also recognise storage for general waste collection.

Regarding criteria B5, clarification is sought on whether this requirement is for the project from conception and thereafter throughout its operational life. Both are important however the longer term servicing requirements will have the most impact for the Council.

9.6. Policy SI8 Waste capacity and net waste self-sufficiency & Policy SI9 Safeguarded waste sites – Neutral

While it is questioned that in the short term the waste apportionment figure has increased it is recognised that in the longer term it decreases from the previous adopted Plan which is welcomed.

Wandsworth Apportionment figure					
Years	2021	2026	2031	2036	2041
Current London Plan (000's tonnes)	252	302	307	313	-
New Draft London Plan (000's tonnes)	264	266	269	275	280

The Council is jointly working with the Western Riverside Waste Authority boroughs to plan for the waste authority area's waste apportionment and welcome the positive wording as set out in criteria B2. The Council also welcomes criteria B3b to enable the consideration of industrial sites as suitable locations to be included to contribute to the apportionment figure.

9.7. Policy SI11 Hydraulic fracturing (Fracking) – Neutral

No comment

9.8. Policy SI12 Flood risk management & Policy SI13 Sustainable drainage – Support

The Council supports the principles of the policy which are in line with the Council's own Flood risk Policies. However funding would be welcome to update surface water management plans in collaboration with neighbouring boroughs.

9.9. Policy SI14 Waterways – strategic role – Support

The Council continues to liaise with the Marine Management Organisation in the drafting of its Local Plan Policies and will contribute to an emerging MMO plan once drafted. AN integrated approach to developing rivers and water strategies is welcome.

9.10. Policy SI15 Water transport – Support

The Council is supportive of the stance that safeguarded wharves should only be redeveloped if it is no longer viable or capable of being made viable for waterborne freight-handling uses. It is also considered relevant to add wording to the Policy which is supportive of consolidation/reconfiguration of the overall boroughs wharf space to enable the potential opportunity to make additional use of wharves for other uses where appropriate and in accordance with Policy. The Council will wish to input into the Mayor’s impending safeguarded wharves review.

9.11. Policy SI16 Waterways – use and enjoyment & Policy SI17 Protecting London’s waterways - Support

The Council supports the overall Policy but would suggest that a figure is applied to the minimum width of a riverside path to ensure the riverside path is not unduly impacted from development proposals. This would be in accordance with the stance of many London Boroughs and Wandsworth Council.

10. Chapter 10 Transport

10.1. Policy T1 Strategic approach to transport – Support/neutral

Walking, cycling and public transport should become the predominant forms of transport within most of London. It also helps to tackle air pollution, and assists with increasing the levels of physical activity for the population as a whole.

T1 A1: Qualified support; the direction of travel is laudable but there does not appear to be enough tangible action/investment in the draft Mayors Transport Strategy (MTS) to achieve this level of mode share for walking, cycling and public transport.

T1 A2: neutral. Table 10.1 includes numerous vague and unfunded schemes. It may be simpler just to say that Development Plans and development proposals should support the delivery of the MTS. It is also unclear how some of the Figures in the draft Mayors Transport Strategy are carried through to the London Plan. Figure 50 shows potential growth in homes and jobs, but it is not clear where this is identified in the London Plan.

T1 B: Support with modification. This is a continuation of existing land use policies, but ideally there should be a reference to capacity as well as connectivity and accessibility. Some locations are well connected and accessible but there is not sufficient capacity to allow for more trips. Para 10.3.2 seems to acknowledge the capacity issue so it should also be mentioned in the policy.

In general, given the plan is intended to cover the period to 2041, there is little on the potential impact of new technologies including autonomous or semi-autonomous vehicles for private, shared or freight uses. The plan should consider these issues.

10.2. Policy T2 Healthy Streets – Support

The policy is largely the same as previous about encouraging sustainable transport. It would be useful to define the "essential" vehicles mentioned in T2 B2

Healthy Streets is critical to ensure that people enjoy their environment and are active within it. It also benefits people in terms of health and wellbeing.

10.3. Policy T3 Transport capacity, connectivity and safeguarding - Support

Support, with modifications as follows:

T3 C states that "Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1... should be refused". Given that Table 10.1 is an unfunded wish list, with many elements not even pro-actively led by the Mayor in the draft MTS (e.g. workplace parking levies), this requirement seems too strong. The policy would be acceptable without this section, i.e. "Development proposals that seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of Local authorities, transport authorities and service providers, should be refused.

T3 D talks of prioritising several TfL-promoted transport schemes in development plans and decisions, but some upgrades outside the Mayor's remit (e.g. non-TfL rail) should also be prioritised. This should be explicit in the policy.

10.4. Policy T4 Assessing and mitigating transport impacts - Support

Essentially a continuation of existing policy.

10.5. Policy T5 Cycling – Support

Generally support with modifications as follows:

T5 B and C offer developers an easy way out of meeting their obligations on site, with the result that space would be required from local authorities, potentially to the detriment of other road users. Developments that are served only by off-site cycle parking are also less likely to succeed in getting people to cycle to/from the development. It would be better for off-site cycle parking to be a last resort and only in exceptional circumstances.

The Council would like to see stronger evidence to justify the increase in minimum cycle parking standards for short stay (class A uses) and long stay (office use) described in para 10.5.3. The doubling of provision from the existing London Plan appears to be based on cycle mode share to destinations in selected boroughs (including Wandsworth) being more than double that elsewhere in London; but there does not appear to be evidence showing whether the existing London Plan standards for cycle parking are currently inadequate in these boroughs, i.e. is cycle parking at capacity given current standards?

Without this evidence it may be that this policy leads to space being given to cycle parking that is not actually needed and will not be used. In combination with T5 B and C (above) as written, this may lead to pressure on local authority land/highway space, to the detriment of other road users.

10.6. Policy T6 Car parking including all sub policies 6.1/6.2/6.3/6.4/6.5 - Object

The proposed maximum residential parking standards are a significant tightening from the current London Plan. Whilst the Council is broadly supportive of minimising the number of car parking spaces the suggested approach of reducing the amount of spaces per unit may lead to overspill parking on surrounding streets, especially outside Controlled Parking Zones. While PTALs provide distinct areas onto which you can attach parking standards, care should be taken on what PTALs actually reflect as they do not indicate spare public transport capacity. Different locations within the same PTAL, may offer very different public transport options. This is of particular concern where it looks to car free development in all areas with a PTAL of 4 to 6 and Opportunity Areas within the borough. Some flexibility must be included to address other local factors.

The residential car parking standards are in some cases contradictory, e.g. according to Table 10.3 all residential development in PTAL 5-6 must be car free; yet at the same time all residential developments must provide car parking spaces for disabled people (Policy T6.1 G) which counts towards the maximum parking provision for the development (Policy T6.1 H4). This can't happen if the development is car free. This contradiction needs to be addressed.

Policy should be more encouraging of car clubs which enable people to live without owning a car. Car club parking provision in residential developments should not count as part of the maximum permitted car parking for a site, i.e. a distinction should be drawn between private car parking (which includes spaces served by electric vehicle charging infrastructure and parking for Blue Badge holders) and shared parking offered by car clubs. Maximum standards should apply to private car parking only. Encouraging car club provision in new development can also help people in the surrounding area to reduce reliance on private car and thereby help the Mayor meet his mode share targets set out in the draft MTS.

10.7. Policy T7 Freight and servicing - support

Generally support but there should be more consideration on the potential impact of autonomous freight.

Policy T7 G is supported but there needs to be additional text to address concerns about the impact of evening/night time deliveries on neighbouring areas/properties e.g. noise. This is a particular concern for mixed use development (residential/retail).

10.8. Policy T8 Aviation – Support / Neutral

The Council supports the need for further aviation capacity in the South East and opposes any expansion at Heathrow as it does not believe that this can be achieved without significant adverse impact on hundreds of thousands of Londoners. Therefore, the Council strongly supports the draft London Plan's view that the best option to deliver that capacity is a 2nd runway at Gatwick, as the evidence is absolutely clear that expansion at Gatwick delivers the same, if not more, economic benefits, whilst subjecting far fewer residents with harmful air quality, extra traffic and noise.

The Council is concerned about the impact of all types of aviation on the health and wellbeing of residents. In particular, the council considers that the London Heliport's, which is now operating at near capacity, is incompatible with its location in a densely populated and thriving community in inner London.

The draft London plan states that "new heliports should be refused.....and steps should be taken to reduce helicopters overflying London". The Council believes that this is not a sustainable position and urges the Mayor, through his draft London Plan, to reconsider and play a more active role in seeking an alternative solution – one which delivers real improvements for the lives of hundreds of local residents in Wandsworth and neighbouring boroughs.

10.9. Policy T9 Funding transport infrastructure through planning –Support/Neutral.

Basically continuation of existing policy but should be better considered in light of the housing growth policies. The Council requests that further work is carried out on a detailed infrastructure plan if it is to realistically achieve growth targets. The Council is currently responding to the consultation of MCIL 2 and is raising a number of concerns about the proposed draft charging schedule. There are currently a range of demands made upon developments and a balance is required in terms of the priorities. Often demands for infrastructure provision or support can have a direct impact on the quantity and type of affordable housing that is provided.

11. Chapter 11 Funding the London Plan

11.1. Policy DF1 Delivery of the Plan and Planning Obligations - Neutral

The Council has already responded to the Mayors Homes for Londoner's Affordable Housing and viability SPG consultation. Since then the Council is still concerned with the potential unknown quantum of affordable housing proposed where an applicant aims to use the Mayors fast track approach and would therefore not require a viability appraisal for above 35%. The Council require any scheme delivering less than 50% affordable homes to submit a viability appraisal to support the quantum of affordable housing being proposed. It is unclear from the SPG how a council would know whether a scheme providing 35% affordable housing that was policy compliant could in fact deliver more than 35% affordable housing, as there will be no requirement for an applicant to provide a viability appraisal with such an offer.

Furthermore it is not clear how a council would be able to test the viability of providing other planning obligations as well as affordable housing. As at present 35% affordable

housing is rarely achieved as is evidenced for London by the Mayor’s AMR, In reality if negotiations seek to secure other essential planning obligations such as education or community facilities, the affordable housing offer is reduced below 35% and the overall viability of planning obligations sought by the council can be tested. Related to this point, the emerging Local Plan policy approach requires an increase in industrial land on site but the increased level of affordable housing required in industrial areas may pressurise the design of a site and undermine the overall design of a scheme as competing policy requirements are balanced. This approach causes uncertainty and the Council seeks clarification of how competing policy requirements are balanced in redesignated industrial areas.

12. Chapter 12 Monitoring

12.1. Policy M1 Monitoring – Neutral

The Council suggests monitoring net increases in both office and industrial land in accordance with Policies E5, E6 and E7 which aim to intensify employment uses. The Council is proposing monitoring net increases in both office and industrial floorspace in accordance with its emerging Local Plan – Employment and Industry.