

## **Wandsworth Council's response to A City for All Londoners**

Wandsworth Council wishes to register the view that there would have been benefits in having a longer consultation period given the wide scope and significance of this vision statement, particularly given that stakeholder consultation events were not concluded until the 23<sup>rd</sup> of November.

Given his background and his commitment to devolution, the Mayor will know that boroughs know their residents the best and have a local mandate. A 'one size fits all' vision from the London Mayor will not necessarily fit all boroughs. So the Mayor's vision should necessarily be confined to high level strategy and avoid inappropriate intrusion into local detail, providing local areas with the flexibility needed to best serve their residents.

### **Accommodating Growth:**

1. The recognition in the Vision of the competing needs for land in London, including for green space and infrastructure of all kinds is supported. In Wandsworth borough, with high land pressures it is vital not to forget, in the drive to significantly increase housing delivery, all the infrastructure required to support new housing, including schools, education, health facilities etc. and the overall need to achieve a balance between housing and economic growth/jobs, to deliver the good growth envisaged and sustainable communities and thriving neighbourhoods.
2. Growth should be sustainable and be focussed on place-making, with a good balance of everything that contributes to making a desirable place – schools, health services, green spaces, quality design of buildings and public spaces etc. It is important that the Mayor does not prioritise housing over economic growth and development needs, and the focus should be on setting the balance between residential and commercial development in order to ensure London and its boroughs have a good balance of homes and jobs as well as other social and community infrastructure that is required to support growth. Local jobs means less pressure on transport infrastructure and the environment, local economy and neighbourhood benefits which can assist in improving and sustaining local public and private services.
3. The recognition to provide for employment land across the city, including that the Mayor will promote viable strategic locations for office space is supported and this space should be protected from speculative development. We recommend that the Mayor should focus on the role of the orbital links between the CAZ, inner London and Outer London to ensure that the distinctive employment roles for each area are carefully planned for to accommodate growth.
4. Inner London has the potential to provide many homes for Londoners to live; but crucially offering employment opportunities, jobs and places for businesses to start-up and grow, particularly in Town Centre locations must be a joint priority. A strategic approach is needed pan-London to ensure a more even spread of job provision is planned for promoted and enabled to

reduce commuting and transport pressures and to recognise modern logistical requirements for modern business needs. An emphasis on connectivity and flexible workspace are the types of innovation and the progressive approach that Wandsworth is seeking to promote through its initiatives (see the programme of roll out of fibre broadband to the Council's estates and developing estate regeneration and areas plans that have the potential to provide new community and hub facilities) and aspirations programme (linking major estate regeneration to apprenticeship, training and employment opportunities). Small, simple and relatively inexpensive solutions like upgrading workplace broadband can often have as big an impact as higher profile big investments.

5. The need to focus intensification around stations and well connected town centres, with more mixed use development, is recognised and supported where this is appropriate, and an emphasis on high quality design will need to be embedded in to future policy to enable competing development to co-exist. The Council would also wish to see a commitment from the London Mayor to securing the positive cooperation of the GLA family, including TfL, in delivering change and improvement. It is recognised that priorities need to be balanced however this should not stand in the way of the delivery of the priorities set out by the Mayor such as more quality housing (see plans for improvement and better use of land around Clapham Junction and the regenerative potential that a new CR2 stations at Clapham Junction and Tooting Broadway could bring). The Council would also emphasise the need for extra growth of transport infrastructure to be matched with equal improvements in rolling stock, transport frequency and other issues of quality in local transport.
6. Wandsworth Council has offered its support to the principle of TfL taking control of some suburban rail services, especially in light of the current dreadful services provided by the Southern rail franchise, of which there appears no sign of improvement. It is disappointing that the Mayor failed to provide the Secretary of State with a sufficiently robust argument. Despite this recent setback, the Mayor should redouble his efforts to build a more robust case that can convince the Secretary of State of the need for greater control of rail services within London. The Mayor should also seek urgent improvements to the current rail services being offered in Inner and Outer London, on which our residents, workforce and businesses are so dependent.

#### Housing:

7. The Mayor's intention to provide a substantial increase in the overall number of homes is welcomed. Wandsworth has an excellent track record in delivering increased levels of high quality housing working successfully with the private sector. This can be seen by the exemplar regeneration which is now maturing in the Nine Elms and Vauxhall Opportunity Area and by the fact that housing delivery targets agreed with previous London Mayors have more than doubled for the Borough over the last 10 years. The speed and scale of delivery in Nine Elms is the result of highly effective cooperative working across two councils, City Hall, land owners and other partners – the Mayor

should ensure that the lessons and benefits of this model are fully learnt and understood as he seeks to deliver on his ambitious housing targets across London.

8. It would be unfortunate however if the Mayor's aspirations were to affect overall housing delivery and the progression of targets such as those relating to affordable housing were imposed or applied without consideration of borough and site specifics and existing land ownerships. As example a site that has been purchased with regard to existing regional and local planning policy targets and development potential cannot then be turned to deliver additionality (e.g. significant additional affordable housing) without taking these factors into account. The risk is that the site would not be developed.
9. The Council notes that the new Affordable Housing and Viability Supplementary Planning Guidance which has just been issued by the Mayor provides incentives to developers to offer a minimum 35% affordable housing albeit at a certain tenure mix. Such certainty in requirement is welcome. However, even a 35% target needs to be applied with flexibility to local circumstances and in a way that does not impede overall numbers delivered. A strict adherence to a certain tenure mix may delay housing delivery certainly as developers transition their delivery plans to new targets.
10. These targets also need to take account of the relationship between housing numbers and infrastructure. If both are to be funded from the same pot, these levels of affordable housing would not be achievable and a more simple device to define "loss and gain" needs to be considered so that developments continue to be bought forward. Locally, it would not have been possible to deliver the Northern Line Extension and also meet these targets, which was recognised in the Opportunity Area Planning Framework that was adopted by the GLA, Lambeth and Wandsworth Councils. The Mayor's support for good architecture and design is also welcomed, but there is a price to be paid for this which must also be met through flexibility in targets particularly where there are substantial requirements for public realm and local facilities.
11. Encouraging housing development at higher densities around transport nodes and on TfL land is supported, but the London Plan should make clear that no two town centres or transport hubs are the same and therefore the appropriateness of development will necessarily vary. In this respect the Borough would welcome further discussion and dialogue as to how the Housing Zone programme could be improved to provide the certainty and context and freedoms which would secure long term development and improvement. The GLA could do more to secure the cooperation of the GLA family (TfL in itself is a collection of transport interests which could work better together and in turn work better for boroughs and Londoners) in moving forward development and also work with Boroughs to bring other public land interests to the table to promote and enable development such as Network Rail and NHS England.
12. Whilst increasing housing delivery targets is broadly supported this must be done with regard to delivering sustainable and quality development. It must

therefore involve a dialogue and support of the private developer sector and also a level of cooperation and cross regional working which has not thus far been achieved by the GLA. London cannot meet London's demand for housing alone and needs to look beyond administrative boundaries that London's populace and workforce do not recognise when seeking the home of their choice that meets their needs.

13. Wandsworth Council wholly supports the objective of making housing more affordable. However this can only be done by increasing overall housing supply and working closely with central Government to promote schemes that provide opportunities to buy. Whilst affordable housing is necessary not least to provide London's lower paid workers with accommodation a strict tenure objective of providing a certain percentage of social rent and intermediate housing may be stymied by lack of public sector investment and the financial capacity of schemes to deliver such forms of subsidised housing at the quantum to make a difference.
14. We welcome the announcement that the Mayor has invited Hugh Bullock, Chairman of leading planning and development company, Gerald Eve, to oversee research into foreign ownership of high end properties in the capital. We hope the task and finish group carrying out this research will demonstrate an understanding of the whole ecology of development and housing delivery, and the necessary enabling role of foreign investment in 'unlocking' delivery to provide housing, affordable housing and supporting local business. The issues are complex – for example foreign purchasers who buy homes for children to live in whilst attending Higher Education will add additional value to the London economy.
15. We are sure the London Mayor will recognise that in meeting London's demand for affordable housing a more nuanced approach is required that allows for a more efficient use of public sector stock, more targeted forms of development enabled by local councils to meet evidenced local needs (e.g. accommodation for existing social renters to downsize to which is developed to meet local neighbourhood demand). We are disappointed by the lack of reference to different forms of housing delivery like self-build and custom-build housing and the collective efforts that London residents should be assisted to make in meeting their housing requirements through their own efforts and finance.
16. Through development of the London (housing) Proposition we would also expect the GLA to support councils in their development and regeneration plans. This would include recognising that Councils should be able retain and utilise RTB one for one receipts and high value asset receipts to support development programmes. The GLA could also consider how they might broadly promote and support estate regeneration initiatives that are committed to improving area, home and to delivering more housing to meet local housing demand. A clear message in this respect would set a green light for positive local dialogue on a matter that is clearly sensitive but has the opportunity to improve neighbourhoods and lives.

17. The Council welcomes the Mayor's broad support for forms of private and intermediate rent housing. Such housing has the potential to be provided in quantum (finances may allow for more homes to be affordable and provide certainty of purchase of homes being developed) and in turn reduce demand side pressure (e.g. for existing private rent housing and social housing). The Council would encourage the London Mayor to positively support schemes that propose 100% rent and provide incentives to encourage such development (e.g. excluding a requirement to provide social rent where 35% of units are provided at London Living Rent). This should certainly be considered as part of a staged introduction of revised and new affordable housing targets.
18. Further whilst the Council would support a London Living Rent product the initial proposals being tested by the GLA present as being unduly complex and have the potential to achieve rent levels which are in effect unaffordable to those on low to middle incomes in higher value areas. It is important that any analysis for this product takes into account the additional charges like service charge costs, which can be a significant outgoing, and have the potential to affect overall viability. Ward based modelling and application of affordability at this level is not necessary and will burden both the GLA, developers and Councils in what rent levels should be set. Better to establish a London wide affordability criteria which is essentially the approach that has been taken through the GLA AMR (e.g. for shared ownership and we believe intermediate rent housing) in previous years or to consider Borough level average incomes as the benchmark to set rents affordable to a range of incomes. There is a need for all tenures of housing to address the needs of people at different income levels – not just those on average and below average incomes and this could be through design (see Pocket Homes) and arrangements which those looking to live in certain parts of London determine themselves (e.g. promoting and enabling sharing).
19. Wandsworth Council welcomes the continued interest of the London Mayor particularly in addressing rough sleeping (a London wide issue which needs a cross borough response) and improving standards in the private rent sector where this is needed. However, he should recognise that in his support of initiatives that might seek to control standards in the private rented sector that it is a Council's responsibility to consider what the proportionate approach is to addressing any issues identified and evidenced. It is not the case, for instance, that area licensing is applicable in all boroughs and the London Mayor must account for changes in the approach to applying selective additional licensing and also the additional burdens that will be put on Councils when the provisions of the Housing and Planning Act 2016 are applied.

#### Public Health:

20. The acknowledgement of the wider determinants of public health to be addressed through policy making is supported. For example policies which support play facilities, playgrounds, sports pitch protection, cultural infrastructure and affordable facilities such as outdoor gyms are welcome and

provision of new sport and play facilities should be in accordance with population increases/housing targets and targeted in areas where obesity/poor health is particularly a problem. We would also hope that the Mayor would recognise that sports and leisure facilities meet needs across borough boundaries and that the deficit of such facilities across many parts of London identified by Sports England is not one that can be easily met.

21. We welcome the Mayor's intention to focus on mental health but would stress that improving mental health begins with fostering the right conditions for families to thrive by giving children the best start in life, and ensuring a life course approach thereafter. We ask the mayor to support our call for improved health intelligence to understand the better prevalence of mental ill health. We would also stress that any work the Mayor intends to do in this areas must be based on close engagement with local Health and Well-being Boards, Clinical leads, health and social care practitioners and the community/voluntary sector.
22. The acknowledgement that the Mayor has limited powers to deliver health services is noted, however there is an opportunity to include policy guidance on how improve existing health infrastructure and provide a new infrastructure through the Planning contributions gained from new development through S106 agreements and the Mayoral Community Infrastructure Levy.

#### Employment Land in Central London and Across the City:

23. The promotion of economic growth in central London, in particular for the VNEB opportunity area which is due to become a major hub for national and international businesses as well as creating a new part of central London is supported. Establishing new economic hubs such as VNEB in an expanded CAZ can support the development of the most productive area of the UK and the competitiveness of the wider economy. GLA support has been an important factor in the remarkable development of the VNEB opportunity area to date and Wandsworth Council wishes to underline the importance of this continuing into the future so the area's full potential can be realised.
24. The Mayor's intention to protect office floorspace from change of use to residential where this is not justified is fully supported. Wandsworth Council is preparing an Article 4 Direction to control this and continues to have concerns about the impact of this permitted development right; the Council encourages the Mayor to join the Council and others across London in raising this issue with CLG to secure a more nuanced permitted development scheme.
25. The encouragement of development in non-central locations with good public transport links is supported.
26. The Mayor's intention to encourage small and medium-sized businesses is supported. The Mayor is encouraged to consider the important role played by managed workspace providers in the future London Plan and how joint

working with local authorities can help stimulate a broader choice of premises options that are relevant to the economy today and into the future. The Mayor is also encouraged to build on the work done by the GLA in compiling the Workspace Providers Directory to develop a detailed on-line platform for workspace providers, detailing the sectors, development and location interests, and affordability approach of each provider. This should include affordable provision for creative industries, as the cultural sector has been the UK's fastest growing sector since 2008.

27. The potential role for housing and economic development that under-utilised industrial land could enable is recognised. Any relocation of established industrial uses will need to be carefully managed, with transport and traffic implications taken into consideration. It should also take into account potential safeguarding of land for schools and other uses that help to contribute to making a desirable place.
28. Co-location of housing and light industrial uses can work successfully, however this will require careful design and layout to ensure that they are good neighbours. Research into successful case studies would be encouraged.

#### Crossrail 2:

29. The delivery of Crossrail 2 and the potential for this to unlock development to meet the needs of London and to improve accessibility across the city is supported.
30. Wandsworth Council recognises that a proposed station at Tooting Broadway has the potential to deliver greater longer term regenerative benefits compared to Balham. However, we would call for the construction to be taken forward in a way that minimises the impact on the local community including any temporary loss of local jobs or business space. We also call on the Mayor to ensure that in Tooting, where there is a high proportion of small traders who are tenants, that their interests are fully considered at all stages of the process to avoid any disproportionate impact.
31. The Crossrail 2 station for Clapham Junction is supported. The Council welcomes the Mayor's interest in the related estate and area regeneration of the Winstanley and York Road estates. It is hoped that the Mayor and his team will continue to support the Council in its regeneration plans by ensuring that the development for Crossrail 2 does not compromise the regenerative plans the Council has and cause undue delay in delivering many hundreds of homes and area improvement. We would seek safeguards to protect the planned estate regeneration by ensuring the most minimal land take and a positive and productive dialogue as to interim uses for any areas that are safeguarded. It is hoped that the Mayor will continue to support positive dialogue that aims to release development potential to meet London current housing demand.

32. It will also be important to carefully consider the aspirations for development and the potential for significant disruption to established communities and town centres when programming this strategic project and scoping the extent of development that Crossrail 2 can unlock.

#### Skills/careers:

33. Welcome recognition of the importance of skills and careers to underpin a wider economic development strategy. The potential devolution of these functions and budgets offers the opportunity to better align them with business/employer needs and make them more relevant to today's economy. In a city and economy as vast and complex as London's, it is important that local government is fully involved in this process. Local borough councils can provide the detailed intelligence and insight to reflect employer requirements and learner/job seeker needs so that the skills system can better deliver for all parts of the community. A newly devolved skills and careers system will need to provide clarity regarding roles and responsibilities to ensure the potential benefits are fully realised.

#### Education:

34. The Vision does not properly address school places. Development of land for housing purposes must address the other infrastructure necessary to make a place desirable – including school and college places. The publication states, on page 28, that, "In particular, I want to make sure we have enough school places in London – by 2025, we will need an additional 105,000 secondary-school places and 60,000 new primary places." Those figures appear unrealistically high. London Councils' latest pan-London work on the need for further secondary school places states that 443 forms of entry, equating to 13,290 places, are needed by 2023, but that 15 of the 32 London boroughs already have plans in place to provide their quota of that overall total and seven boroughs are forecasting an oversupply of places by 2023. The primary figure also looks much too high, as nearly all the short- to medium-term need for primary places has already been met. The Vision should provide an estimate of how many additional places will be needed between 2025 and 2041, by when, according to page 19, the population of London, ". . . is set to reach 10.5 million by 2041, with an average increase of almost 44,000 households each year". As a minimum the GLA could scale up the need based upon the projected population number.
35. The strategy recognises (page 50) the need to maintain and enhance London's reputation for excellent education provision and student outcomes. However, it fails to address two key issues facing London where the Mayor can make a significant contribution, despite not having a statutory role. The first is in relation to teacher recruitment at all levels, from newly qualified entrants to senior leaders. Many new entrants to the profession struggle to find affordable housing, while at the other end of the spectrum, recruiting headteachers, particularly in primary schools, remains one of the most pressing challenges. The Mayor is in a unique position to lead a high profile campaign to promote the benefits of teaching in London, for example, through the city's resources, access to leading edge research and career



opportunities. In addition, a strategy to attract and retain key workers would add value to the work of other organisations.

36. The second key omission in the consultation is any reference to the funding that goes into schools. The Government's planned introduction of a national funding formula for schools will redistribute capital away from the city. It is only the scale of that redistribution that is unclear; the negative impact is not disputed. The Mayor should strongly champion the needs of the city, in terms of ensuring that Government fully recognises the higher costs of education provision in London.

#### Environment and transport:

37. Welcome the continued protection for green spaces, as well as a joined-up approach to adaption to climate change and recognising the cross-cutting benefits of green-infrastructure (air-quality, flooding, amenity, biodiversity etc.).
38. Welcome the inclusion of the cultural infrastructure plan and focus on promoting tourism which will support Wandsworth Council's regeneration programmes across the borough, in particular the new cultural quarter at VNEB. We would commend an approach that ensures culture is integrated within regeneration planning from an early point.
39. Support measures to reduce carbon emissions through new development; however, policies to promote zero carbon development should not lead to reduced contributions for affordable housing or other necessary infrastructure.
40. Support measures to tackle poor air quality and is generally supportive of the intention of the ES (Emissions Surcharge) and the additional benefits to air quality and the health of Londoners that it will provide.
41. The introduction of a ULEZ, whichever proposal is implemented will have an impact upon residents and businesses, including SMEs, within the Borough. In addition our own vehicle fleet and that of our contractors, which are essential for the delivery of our services, will also be affected in terms of cost of compliance. These factors need to be carefully considered when deciding upon the choice of scheme and the implementation date.
42. Generally support the proposal to introduce a ULEZ one year earlier in 2019 due to the significant reductions in NOx emissions that it will achieve.
43. Generally support of the proposal to introduce a London Wide ULEZ for Heavy Vehicles.
44. This policy measure of expanding the ULEZ to the North and South Circular Roads less supported as at present there is a lack of detail in the proposal for an informed decision to be made. More information is needed on the likely boundary impacts.

45. Support the Mayor to promote good air quality through design, investment in public transport (including replacing diesel buses with hybrid or low emission green buses), walking, cycling and new technologies, and new buildings to be Air Quality Positive. We seek the Mayor's support for new transport infrastructure that prioritises more sustainable transport modes as alternatives to cars. In particular we seek the Mayor's support for the proposed Nine Elms to Pimlico Bridge which is needed to fill the largest gap between existing river crossings in central London and to meet fast growing transport demands. We would also seek the Mayor's support for the proposed Diamond Jubilee Bridge in Battersea that provides important links across the river and directly links the Lombard Road/York Road Riverside Focal point to the Imperial Wharf Station. These would be the first bridges in central London designed around the needs of both cyclists and pedestrians, offering a safe, valuable and zero emission river crossing at a fraction of the cost of other Thames bridge proposals. We would also reiterate this Council's longstanding support for a direct rail link from Clapham Junction to Heathrow, which would provide significant transport benefit irrespective of any expansion of Heathrow.
46. We would also encourage the Mayor to support other transport infrastructure improvements where they can assist in the regeneration of areas such as town centres. The Council has been working closely with TfL in taking forward the removal of the Wandsworth One Way System, which is both a blockage in the strategic road network, but also a barrier to the full regeneration of Wandsworth Town centre. We would seek the Mayor's support in ensuring that this and other similar schemes are implemented.
47. Good public transport between residential areas and employment centres is critical. The mayor is proposing that he should take control of a greater part of the suburban rail network and it is important that operational improvements are achieved, such that the appalling service currently provided by the Southern franchise is addressed and any repetition is avoided in the future. Support actions by the Mayor to lobby for actions to be taken in relation to emissions from construction.
48. It will be important to know how the environment strategy and environmental policies in the London Plan relate to ensure that policies which impact on planning are set out in the appropriate document.
49. Measures to encourage mode shift from private motorised transport are supported to help keep the city moving as population and activity continues to grow. However, it is hoped that there will be no wholesale switch to mode-based funding for borough transport schemes which is not always conducive to delivering the kind of balanced proposals that reflect and support the transport needs of all.
50. The important role of boroughs in delivering the Mayor's Transport Strategy via Local Implementation Plans should be recognised. It would be useful to reaffirm the City Charter to emphasise the autonomy of boroughs to deliver

projects according to local transport needs, while also meeting their statutory duty of implementing the Mayor's Transport Strategy.

51. The recognition that higher density does not necessarily mean high rise is welcomed. However, whilst the Council would support higher densities, where appropriate, the Mayor is encouraged to clearly set out his approach to tall buildings to inform Local Plan making.