

**DRAFT NEW LONDON PLAN – EXAMINATION IN PUBLIC**  
**Matter 11: Strategic approach to accommodating development needs**

**WRITTEN STATEMENT**  
**LONDON BOROUGH OF WANDSWORTH**

- 1.1 This statement has been prepared by the London Borough of Wandsworth, and it relates to Matter 11 (Strategic approach to development needs) only. It should be read in conjunction with Wandsworth Council's response to the draft New London Plan consultation, submitted on 2 March 2018.
- 1.2 The Council welcomes the Panel of Inspectors' decision to examine the strategic approach to accommodating development needs within London. The London Borough of Wandsworth has an excellent track record in delivering significant developments within its borough to accommodate a growing population. In particular, the Council has successfully worked within an Opportunity Area Framework at Nine Elms / Vauxhall, together with its partners, to deliver high density development and a significant number of new homes, commercial floorspace as well as key transport and social infrastructure. The Council has also applied a policy of allowing high density development in town centres and identified focal points, where there is now clear evidence on the ground of the success of this approach. However, London is facing an increasing challenge in meeting its development needs, and therefore the Council's view is that the overall strategic approach, particularly the fact that the Mayor has not carried out a London-wide Green Belt review, is neither justified nor consistent with national policy.
- 1.3 The London Borough of Wandsworth's response in relation to the Panel's questions is as follows:
- 1.4 **M11. Is the strategic approach to accommodating development needs within London justified and consistent with national policy? In particular:**
  - a) **Is the focus on the Central Activities Zone, Town Centres, Opportunity Areas and through the intensification of existing built-up areas in inner and outer London whilst protecting the Green Belt and Metropolitan Open Land justified and would it be effective in meeting identified needs and achieving sustainable development?**
  - b) **Alternatively, should some of London's development needs be met through reviewing Green Belt and Metropolitan Open Land in London?**
- 1.5 Whilst the draft Plan discusses at length the spatial development patterns in terms of housing, economy, infrastructure etc., there is no clear underlying spatial development strategy, and most importantly, there is no evidence or justification on why the specific approach set out in the draft Plan was chosen (amongst other options). The IIA (2017) implies that spatial options were formulated and considered, with the draft Plan being

based on the “sustainable intensification” option, i.e. the same principle as the previous London Plans, whilst at the same time pushing it much further in light of the significant housing delivery increases. It is difficult to glean from the evidence why this choice was made. The Council is very concerned that this approach on its own will not satisfy the level of development required, particularly in the light of the small sites assumptions and the lack of justification for Policy H2. It is therefore unclear why Green Belt releases inside London as well as where possible collaborative reviews of Green Belt outside of London, with the wider south east partners, were not considered nor undertaken. As set out in the Council’s statement on Matter 20, the delivery of housing on small sites, which is based on the implementation of a new policy approach rather than actual capacity, is not credible. Yet at the same time the Mayor appears to be confident that the required level of development needs can be expected to be delivered through “sustainable intensification”, disregarding any consideration of the potential role that Green Belt land could play.

- 1.6 Whilst the Council supports in principle the decision to prioritise intensification of built-up areas, provided that a plan-led and design-led approach is being followed, rather than building on open space, it is evident from the draft Plan’s housing figures that intensifying land within existing built-up areas alone will not meet all of London’s development needs. The consideration of Green Belt land for potential development purposes would not undermine the priority to be given to brownfield sites, provided that the review and potential release of Green Belt is done through a planned, managed and phased approach. A plan-led approach would also be preferable to ad hoc planning applications for development on Green Belt land that some boroughs may receive as a result of such authorities being unable to demonstrate a 5-year housing land supply. Indeed, Wandsworth Council is aware of various boroughs having to consider locating essential infrastructure, such as secondary schools, within designated open land as the development needs cannot be met in built-up areas only.
- 1.7 The Council therefore questions why the Mayor has not undertaken a strategic review of the Green Belt in London. It is important to note that undertaking a review of London’s Green Belt does not necessarily mean that such land has to be released. It is of concern that the Mayor has put a lot of emphasis on the protection of Green Belt land and the explicit opposition to “any” development on Green Belt within London, without having carried out any review of such land and whether it still meets the criteria as set out in the NPPF. Whilst Wandsworth Council always has and will continue to play a key role in delivering much needed housing in London, particularly within its Opportunity and regeneration areas, the level of housing need has reached such an extent that the Mayor cannot categorically exclude all designated land from potential release and development to accommodate some of London’s housing capacity target.
- 1.8 A Green Belt review could also tie in with 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. Whilst the status and quality of Green Belt land, i.e. whether it is neglected or degraded, is not necessarily a

reason for de-designation, a review could have also highlighted potential areas that could have benefitted from improvements through development. A sensible review of such land, and development where appropriate may be acceptable provided that the land no longer meets the purposes set out in the NPPF.

- 1.9 In addition, the Mayor has the power to lobby Government to enable sensible reviews and releases of Green Belt land that no longer meets its purpose to meet its housing need. Furthermore, the Mayor could instigate a London-wide strategic review of Green Belt land rather than relying on Boroughs to carry out their own independent reviews in a piecemeal approach, potentially adopting different methodologies.
- 1.10 Wandsworth Council would like to encourage the Mayor “*to explore options beyond the existing philosophy of the London Plan*” to meet the objectively assessed needs as far as possible. This was also highlighted by the Inspector who undertook the examination in to the Further Alterations of the London Plan (November 2014). It is therefore disappointing that the Mayor does not appear to have taken the previous Inspector’s concerns into account. Therefore, the draft Plan’s choice on the strategic approach to accommodate the development needs is not justified as other choices and options, such as the review and where applicable the release for development of Green Belt land, and more specific collaboration with the wider south east partners, have not been fully explored or considered.
- 1.11 To conclude, the Council is of the view that the GLA/Mayor of London should have undertaken a review of the whole of London’s Green Belt. It is the Mayor’s role to provide a strategic planning framework and in this instance the Mayor should have taken a strategic overview. This would have allowed the implementation of a consistent methodology and principles. Furthermore, the draft Plan should enable boroughs who are willing to conduct Green Belt reviews to do so, either alone or in collaboration with other authorities. Given the ambitious housing targets and the substantive concerns about meeting them, it is not justified to rule out “any” development on Green Belt, especially as not all Green Belt meets the purposes as set out in the NPPF. In addition, Green Belt should not automatically be seen as the number one priority that trumps all other considerations in achieving sustainable development.
- 1.12 In relation to the Opportunity Areas, Wandsworth Council would like to draw the Panel’s attention to the Council’s Statement on Matter 14 (Opportunity Areas).

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