

# WANDSWORTH

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## Statement of Consultation Regulation 18

Local Plan Publication (Regulation 19) Version  
January 2022



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# 1.0 Introduction

- 1.1 This Consultation Statement sets out how Wandsworth Borough Council has undertaken consultation on the new Local Plan. The statement describes the consultation and engagement carried out by the Council and how it has complied with statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). It also demonstrates that public involvement is consistent with Wandsworth's Statement of Community Involvement (SCI) adopted in 2019.
- 1.2 Wandsworth's Adopted Local Plan sets out policies and site allocations that will guide development in the borough over the next 15 years. Once adopted, the new Local Plan will replace the existing policies and site allocations within the Core Strategy (CS), Development Management Plan Document (DMPD), Site Specific Allocations Document (SSAD) and Local Plan Employment and Industry Document (LPEID).
- 1.3 This Local Plan Consultation Statement details the consultation that was undertaken at each stage of the document's preparation. It is expected this statement will subsequently be updated when the Council submits the Plan to the Secretary of State for Independent Examination in Public.
- 1.4 A separate Duty to Co-operate Statement has been published to cover the engagement that has taken place with adjoining Boroughs and prescribed duty to co-operate bodies. It also addresses the context for subregional and London-wide joint working as it informs the stages of preparing the Local Plan in line with the requirements of the NPPF.

## 2.0 Background

### 2.1 Overview of consultation

2.1 The Draft Local Plan is the second of three stages in preparing the new Local Plan. The first stage was the publication of the Issues and Options document in the winter of 2018, for public consultation. Table 1 below sets out the various stages of producing the Local Plan. Full details of the Local Plan timetable are set out in the [Local Development Scheme](#) (LDS) 2019 and 2020 [revisions](#).

### 2.2 The Issues and Options consultation

The Issues and Options consultation was the first borough-wide public consultation undertaken by the Council with regard to the preparation of the new Local Plan and consultees were invited to comment on high-level issues that the Council had identified following a review of the existing Local Plan and National and Regional Policy. The public consultation took place over a period of six weeks between 11 December 2018 and 7th February 2019 and was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The [Issues and Options Consultation Statement](#) provides an overview of the Issues and Options consultation, informing who and how the Council consulted, what consultation material was used, how comments received were considered and an evaluation of the consultation, provides a summary of the comments received and the Council's initial response to those comments.

### 2.3 The Issues and Options consultation document included the following:

- A set of draft objectives for the new Local Plan that give an indication of the expected scope of the Plan's Strategy.
- Identification of the main issues and challenges relevant to future development in the borough which will be addressed in the new Local Plan, based on different themes. In preparing the new Wandsworth Local Plan, regular formal meetings were held with different stakeholder groups and other departments within the Council. The Planning Policy Team met with Wandsworth Councillors on multiple occasions to discuss progress of the Local Plan. a public engagement even was held 17 January 2020 to discuss policy topics.

Table 1: Summary of Local Plan consultations

When	What
3 December 2018 - 28 January 2019 (completed)	Consultation on the scope of the review of the Local Plan – Issues Document
4 January 2021 - 1 March 2021	8 week Regulation 18 consultation on the Draft Local Plan ('Pre-publication').
Winter 2021/2022	'Publication' version consultation under Regulation 19 of the Draft Local Plan that the Council intends to submit to the Secretary of State alongside consultation comments.
Spring 2022	Submission of the 'Publication' version of the new Local Plan and evidence base to the Secretary of State, including a statement on consultation
Summer / Autumn 2022	Submission and examination of the 'Publication' version of the new Local Plan and evidence base to the Secretary of State, including a Statement of Consultation.
Spring / Summer 2023	The new Local Plan is adopted by the Council, replacing the existing Local Plan. It is used to inform decisions on planning applications.

2.4 A full First Draft Local Plan was then prepared for consultation in January 2021 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report summarises the consultation and the responses received.

2.5 The following steps have been taken to ensure the public have been given adequate opportunity to provide comments and how these incorporated into the Local Plan.

## 3.0 First Draft Local Plan - January 2021

- 3.1 The second stage, the preparation of this Draft Local Plan builds on the Issues and Options document and the feedback received during consultation. It sets out the Council's proposed strategy for the future development of the Borough, the site allocations that relate to this and the relevant policies against which future development proposals and planning applications will be assessed.
- 3.2 Public consultation took place between 4 January 2021 to 1 March 2021 on the First Draft Local Plan, known as a Pre-Publication version consultation.
- 3.3 The Draft Local Plan consultation material includes the following documents:
- Wandsworth Borough Draft Local Plan (Regulation 18)
  - Erratum for Draft Local Plan document
  - Sustainability Appraisal
  - Policies Map Changes document
- 3.4 Information comprising the evidence base to support preparation of the new Local Plan is referenced in the consultation documents and published on the [Council's website](#).

### 3.5 Who was consulted?

The Local Planning Authority consults extensively on all planning documents and has an ever-evolving consultee database stored on Keystone Objective an engagement system. This system is updated at each consultation event or when notified by consultees. All Specific Consultees (as identified under Part 1 of the 'Regulations') have been consulted. In addition, the Keystone Objective consultee database ensures that all interested parties who have previously expressed an interest or commented are notified by means of email or letter.

### 3.6 How we consulted

A comprehensive effort was undertaken in advertising the consultation and engaging the community in the Local Plan process. The council's approach to consultation far exceeded statutory requirement to attempt to broaden participation with the Local Plan. Due to COVID 19 restrictions virtual meetings and workshops replaced some of the usual face to face meetings. Methods used to consult included the following:

### 3.7 *Emails & letters*

A notification letter sent to all on the Local Plan consultee database (approximately 1450 residents, local businesses and organisations and statutory consultees). Appendix 4 details the names of those consulted and those that responded.

This list as at 4 January 2021 consisted of:

- Consultee Post - 460
- Consultee Email - 807
- Agent Post - 24
- Agent Email - 147

3.8 Alternatively to making comments directly into the Keystone Objective Consultation Portal as described above, written responses including letter and email responses were also welcomed at Council offices or libraries.

### 3.9 *Online workshops*

As part of the Local Plan consultation period for Wandsworth, several virtual consultation events were held to increase engagement amongst those who are 'seldom heard', or 'underserved', by traditional statutory consultation methods. There was a particular emphasis on engaging young people and those who may not be familiar with the role of the planning department or the purpose of the Local Plan.

3.10 Digital workshops are a new format for the Wandsworth Planning Policy team and were intended to test models for the future, introduce the team to digital facilitation and include some training about creative collaboration and best practice.

3.11 Eight events were held, each of which introduced the Local Plan and focused on one of the seven area strategies across the borough. Through a mixed strategy, the team worked directly with some community groups, including schools and youth services; sent targeted invites to community groups; and shared some events with key contacts in the public.

3.12 Given that the consultation period was carried out during the pandemic, there was a need to be flexible and adapt to the changing needs of community groups, schools and the youth services we worked with. Events were designed in a workshop model to be light touch, conversational and welcoming. The format included a brief overview of the Local Plan development process; an interactive discussion and mapping activity; and a Q&A, followed by sign-posting to the formal comment process. The sessions were held using the video conferencing platform Zoom, and the digital whiteboard software, Miro. For further details please refer to [Wandsworth Engagement Summary Report](#). The final session was held in person later in the year.

3.13 Details of the events are set out below:

Area Strategy	Date	No. of participants	Group
Putney	10/02/2021	4	Ark Academy Putney Y13 Geography students
Roehampton	01/03/2021	6	The Base Youth Centre
Wandsworth Town	16/02/2021	7	Age UK / Wandsworth Older People's Forum and mixed group of community members
Balham	16/02/2021	15	Mixed group community members and local businesses
Tooting	17/02/2021	18	Mixed group of work experience students from schools or virtual schools based in Richmond and Wandsworth
Clapham Junction	18/02/2021	10	Mixed group of community members and local businesses
Additional	02/03/2021	12	Wandsworth Youth Forum
Nine Elms	07/06/2021	15	FAST Youth Centre
	TOTAL	87	

3.14 There were 103 comments made during the events which have been useful to gauge opinion and confirm some of the content of the plan.

Many comments related to suggestions for transport and active travel improvements, heritage and culture suggestions or concerns about safety which can be passed on to the relevant teams. Some examples include:

- Desire for increased Biodiversity (more trees in Tooting high street)
- Concerns about safety and security (King George's park)
- Comments also reflected demand for modern co-working spaces in high streets like Balham
- Improved wayfinding (Clapham Junction should be a welcome to Wandsworth)
- Public realm improvements (accessibility of the Wandle trail and desire for wider pavements)
- Desire for better public education about recycling and more water fountains to reduce plastic bottle use. — Support for cycling and active travel.

### 3.14 Publicity and Advertising

#### *Posters*

Digital Posters were put up at 25 locations across the borough.

#### *Summary Leaflets*

Features in Brightside which is the magazine of Wandsworth Council and contains a range of information about services and events (140,000 residents), Brightside Online (23,000 residents).

#### *Social Media*

In addition, the Council used social media to publicise the consultation.

- 3 Facebook statuses were posted that had a total reach of 7,012 users combined.
- 7 Tweets were also sent out that appeared on the feed of an average of 30,468 users per Tweet.

# 04 Summary of Consultation Responses

4.1 In total 1594 specific comments were received from 200 respondents, including from Duty to Co-operate bodies. All comments submitted have been fully considered and an individual officer response has been formulated and available in Appendix 5.

A summary of the main issues raised and how these have been addressed in the Local Plan has been included as Appendix 4.

## 4.2 Changes not arising directly from consultation responses

As a result of reviewing the consultation comments several Local Plan Policies were restructured to better reflect the intention of the policies, amendments made, and two further policies added.

Below is a list of the Local Plan Policy numbering and additional changes:

- LP22 Planning Obligations now LP62 (Moved from Providing for Wandsworth People’s Chapter to Implementation Chapter)
- LP24 Provision of New Homes deleted. Policy SDS1: The Spatial Development Strategy has been amended to include reference to spatial borough-wide requirements such as housing and employment land. This change was made to provide clarity at the very start of the Plan regarding its strategic approach which necessitates the need for the deletion of Policy LP 24: Provision of New Homes due to replication
- LP35 Visitor Accommodation now LP46 (Moved from Providing Homes Chapter to Ensuring the Vitality, Vibrancy and Uniqueness of the Borough’s Centres Chapter)
- LP61 Monitoring Local Plan (New Policy) added as a result of comments from amenity groups seeking more details on how the plan will be monitored and assessed.
- LP63 Neighbourhood Planning (New Policy) added as a result of comments from various residents and amenity groups regarding consultation with residents and providing a mechanism for communities to have a say on development. and that in the event of a Neighbourhood Plan being prepared; it is in accordance with the Local Plan.

Further changes have been made to the Local Plan not arising from consultee comments and below are some of the main amendments:

- Policy LP25 (now LP 23 in the Publication version) has been amended to change the target affordable housing tenure mix of 50% low-cost rent products and 50% intermediate products to 50% low-cost rent products, 25% First Homes and 25% intermediate products (other than First Homes). Policy LP25 (now LP 23 in the Publication version)

will now require the delivery of First Homes which are discounted by at least 30% against the market value. The Council will develop and apply local eligibility criteria (such as income caps) which will be secured at planning application stage as part of section 106 agreements, which might in some cases necessitate a greater level of discount. The local eligibility criteria will seek to strike a careful balance between increasing the affordability of the product to households on a wider range of incomes, while not adversely affecting the viability of development and overall provision of affordable housing at the borough-wide scale. This is a similar approach to the currently adopted intermediate housing affordability criteria which are reviewed annually.

- The Whole Plan Viability Assessment evidence supports removal of the specific Nine Elms 15% minimum affordable housing threshold. The study shows that the application of the 35% affordable housing threshold across the whole Borough, in conformity with the London Plan, would not negatively affect the viability of development or the delivery of infrastructure. Therefore, Policy LP25 (now LP 23 in the Publication version) has been amended to limit the requirement for viability evidence to those circumstances which are specified in the London Plan and to measure affordable housing in habitable rooms. These amendments would mitigate the risk of non-conformity with the London Plan while still allowing for developers to make a case through Financial Viability Appraisal at planning application stage as set out in the NPPF and as currently occurs on sites across the borough.
- The capacity of Site Allocations has been reviewed and refined in light of the London Plan requirement to follow a design-led methodology to calculate housing and employment land capacity. The capacity of each Area Strategy, individual Site Allocations, and the overall housing capacity of the Plan is now updated.
- Wording has been added to LP1 Urban Design and background text to refer to Design Codes.
- In response to mitigation identified in the Sustainability Appraisal additional wording has been added at policies LP3. A The Historic Environment, LP12.A Flood Risk, LP14 K2 Air Quality and Pollution and LP15.A6 Health and Wellbeing.
- LP7 Policy text has been expanded by adding B.9 clause; 'not result in the net loss of 3 bedroom homes (as originally built)'. To ensure that the redevelopment of small sites does not result in the net loss of family-sized accommodation.
- LP23 Digital Infrastructure. Information added to the policy about the South London Innovation Corridor as a result of comments from Duty To Cooperate meeting with Lambeth Council.
- LP37 Managing land for Industry and Distribution. Removed Part D.2 relating to the exception test. This exception test is considered to potentially provide a loophole to the loss of industrial land,

should existing businesses be relocated to vacant premises that are already within an economic land designation, which is contrary to the policy ambitions.

- LP52 Public Transport and Infrastructure. Added new bullet point D for clarity: 'Development proposals, including change of use, that require provision of, or contributions towards, necessary and relevant transport and access improvements established through a transport assessment or statement will make that provision or contribution.'
- LP56 Urban Greening Factor. Additional wording added to the supporting text to provide clarity on providing compliance for phased and outline applications and how the target UGF scores should be submitted.
- Appendix 1 - Marketing evidence (Offices)

Included requirement that larger offices provide 1,000sqms of office floorspace unless evidence is provided.

## 05 Consultation & Next Steps

- 5.1 This consultation statement forms part of the supporting information for the publication of the Local Plan for Formal Consultation (under Regulation 19) of the Town and Country (Local Development) (England) Regulations 2012.
- 5.2 The pre-publication version of the Plan ran for a period of 6 weeks between 4 January and 1 March 2021. Following which a review of the comments received has been undertaken to determine whether further changes are required before the plan is then out for consultation as Regulation 19 stage Publication version. Consultation is currently scheduled for January 2022. The consultation will consider whether the plan is “sound” according to the 4 tests set out in paragraph 35 of the National Planning Policy Framework (NPPF). Submission is currently scheduled for Spring 2022, with an indicative date for examination late Summer 2022 and adoption in early 2023.

Consultee Database

Mrs Sunipa Rai	Peter Croggon
Derek Theobald	Mrs Beatrice Crooks
Viv Evans	Ms Rung Ratnpinyotip
Jane Hamilton	Judith Hunter
Jan Lloyd	Mr Christopher Edwards
Claire Beadon	Mr Andrew Cordery
Mr R Armstrong	Mrs P Davies
Stuart Oliver	Clare Chettle
Barbara Van Heel	Mr Misbah Islam
Mr Hugh Lockhart-Ball	Joanne Woodward
Mr Mark Dodgson	Mr Duncan Clarke
Rev Paul Kennington	Mr H Cowd
Rev Christopher Davis	Nicola Morris
Reverend Canon Peter Clark	Mr John Trayner
Sue Farley	Jim Nicolson
Rev Father	M Illand
Rev John Shepherd	Frances Radcliffe OBE
Fr Christopher Heaps	Ms Raksha Shah
Andrew Ottley	Mrs H Thompson
Raminder S Jando	Rev Leroy Francis
Ben Connop	Bruce St Julian-Bown
Dr T Krakowska	Mr A Karmani
Mr S J Ryan	Celeste Nri
Mrs S P Schwimmer	Ruth Durbin
Mr James Smith	Mervyn Millar
Mr Christopher Wickham	R T Pannyfather
John Archer	Mrs J Richardson-Chapple
Andrew Harper	Nicholas Cooper
Christopher Borkowski	Laura Simpson
N H Bristow	Zal Davar
F I M Vandenberg	Mrs Sunipa Rai
Bill Bailey	Rev Jon Daldin
Lord Rogers	Mr Mozhar Ali
Robert Wilson	Mr M Ouhla
Ms Rosemary Torrington	Mr Chris Carter
Bruce Mackenzie	Miss M Hogan
Shirley Passmore	Ben Clover
John Brindley	Tony Griffiths
John Assael	Geoffrey Cox
Mr Martin Mills	T Marteau
Harvey Heath	Miss P Cocklin
Mark Jordan	Miss Prue Raper
Duncan Hawkins	Mrs P Davies
Nigel Pallace	Matt Ball
Vicki Carroll	Lt (SCC) D W Holland RNR
Janis Humberstone	Bob Knowles
Paul Henry	Miss D M Hockley
Marian Burley	Mrs Colleen Bowen
Eric Greber	Mrs Cathy Salisbury

Oliver Chipperfield  
Miss Caroline Collins  
Mrs Christine Fremantle  
Jakki Morgan  
K Brownutt  
Rev Dr J E S Jacobs  
M J Murphy  
Rev Father  
Mr Robin Sims  
Mr E Potter  
Linden Groves  
Mr Haroon Karim  
Nick Hutchings  
William Saxby  
Ruth Condell  
Mr Kevin Tompkins  
Mr Paul Lomas  
Jim Green  
Ms Gillian Wightnick  
Tarek Iskander  
Jatinder Verma  
Mrs Betty Kelley  
Chas Newens  
Catherine Mason  
Gill Chapple  
Alexander Ashworth  
David Lewis  
Mrs Debbie Kenny  
Stefan Kuchar  
Rashum Varne  
Rev Bill Warren  
Fr Davis Vadakkumpadan  
Rev Clare Taylor  
Malcolm Chevin  
Mrs J Bartley  
Dave Lakin  
Bridget Conigliaro  
Rev David Gillian  
Mr P Coulson  
Ms Jocelyn Cole  
Mr R A Hickie  
Mr John F Cheetham  
Mr A Williams  
Michael Buckingham  
Mr B Botting  
Mr Julian Burton  
Stephen R J Briegel  
Stephen Benton  
Bruce Mackenzie  
Shirley Passmore  
Miss Christine Reeves  
Manuel Button  
John Horrocks  
Tim Edmundson  
Steven Gough  
John Dawson  
Harvey Heath  
Diane Walls  
A D Taylor  
Chris Laytham  
Brian Barnes MBE  
Nicola Hooshangpour  
Susie Morrow  
Mr Mike Ness  
Mr Chris Shaw  
Mr Jason Slocombe  
Mr P W Lee  
Mr Jonathan Smith  
Mr P D Elkins  
Michael Noy  
Mr Andrew Lea-Gerrard RIBA  
Mr Peter Deakins  
Lillias Gillies  
Ms Razia Shariff  
Lourdes Prestamero  
Mr Keith Garner  
Ric Hawley  
Mr Price  
Mrs Laura Sutton  
Chris Jago  
Bob Butler  
Richard Sayer  
Patrick Dardis  
Mr Michael Graubart  
Mr Robert Barr  
Mr Nigel Buckie  
Ms Rose deFalbe  
Mr Claude Partridge  
Mrs Mary Rees  
Mr Marc Newey  
Mr Oliver Colvile  
Mr David Patterson  
Andy Bow  
Richard Broome  
John Ager  
Carol Tibbs  
Malcolm Alsop  
Ms Nicola Sanderson  
Laurence S Eaton  
John Booth

John Brindley  
John Assael  
Mr Martin Mills  
Harvey Heath  
Mark Jordan  
Duncan Hawkins  
Nigel Pallace  
Vicki Carroll  
Janis Humberstone  
Paul Henry  
Marian Burley  
Eric Greber  
Oliver Chipperfield  
Susie Morrow  
Mr Mike Ness  
Mr Chris Shaw  
Mr Jason Slocombe  
Mr P W Lee  
Mr Jonathan Smith  
Mr P D Elkins  
Michael Noy  
Mr Andrew Lea-Gerrard RIBA  
Mr Peter Deakins  
Lillias Gillies  
Ms Razia Shariff  
Lourdes Prestamero  
Mr Keith Garner  
Ric Hawley  
Mr Price  
Mrs Laura Sutton  
Chris Jago  
Bob Butler  
Richard Sayer  
Patrick Dardis  
Mr Michael Graubart  
Mr Robert Barr  
Mr Nigel Buckie  
Ms Rose deFalbe  
Mr Claude Partridge  
Mrs Mary Rees  
Mr Marc Newey  
Mr Oliver Colvile  
Mr David Patterson  
Andy Bow  
Richard Broome  
John Ager  
Carol Tibbs  
Malcolm Alsop  
Ms Nicola Sanderson  
Laurence S Eaton

Sarah Austin  
Vijay Rajput  
Mr James Phillip  
Senia Dedic  
John Horrocks  
Peter Hapgood  
Helen Bell  
Jatinder Verma  
Jean Stanley  
Mark Poulter  
Louise Simms  
Sue Clarke  
Charlie Ryder  
Betsy Blatchley  
Lynette Shanbury  
Louise Raven-Tiemele  
Annie McDowall  
Annaliese Boucher  
Kitty Martin  
Veroika Wilson  
Ivan Thorley  
Esther Clevely  
Mr Will Olmi  
Inma Goodhew  
Emilia Teglia  
Ingrid Barnes  
B Hudson  
David Guyan  
Mr Paul Watson  
Gillian Nicks  
Mr Toby Hopkins  
Mr Mike Grahn  
OCL Jo W Tipson  
Mr Eoghan McConville  
Robert Wellburn  
adam hutchings  
Mr Glyn Goodwin GylN Goodwin  
Ms Melanie Murphy  
Mr Rob Harrison  
Caroline Julian  
Mohamed Essa  
Simon Gillott  
Tim Godfrey  
Edward Rich  
Wandle Valley Park  
Garry Pepe  
Laura Jenkinson  
Mr Ross Brereton  
Natalya Palit  
Lois Davis

John Booth  
Sarah Austin  
Vijay Rajput  
Mr James Phillip  
Simon Smith  
Jack Warshaw  
Michael Aukett  
David Mean  
Prof Paul O'Prey  
Gerard Livett  
Mr Paul Durrell  
Mr Alex Imlach  
Ms Clare Kakembo  
Mr John McEvoy  
John G Dean  
Tim Hall  
Ms Alice Fookes  
Mr C B Hammond  
Mrs Gladys Whigham  
Father Drago Berisic  
Fr David Peck  
Mike Benner  
Lois Robinson  
Rev S J Melliush  
Ms Claire Taor  
Lord Foster  
Dave Johnson  
Mr Martin Branston  
Ms Sylvie Chrzanowska  
Frances Bird  
Mr D L Walker  
Miss Beverley Shillingford  
Mr Abbas Choudry  
Mr Anez Jussab  
Gregor Mackie  
Martin Ireland  
Edward Goodchild  
D A Johnson  
Mr J Kelly  
Michael Leigh  
Andrew Pollard  
Brenda Puech  
Ms Julia Matcham  
Lorinda Freint  
P W Rees  
Mike Dunton  
Miss Shirley Kermer  
Mrs Marlene Price  
Don Burrows  
Mr Michael Radcliffe

Mr Matt Verlander  
Tony Burton  
Mr James Grant  
Alison Chippendale  
Paul Hopwood  
Jane Kellock  
Barbara Jennings  
Lucy Whitehead  
Andrew Malvern  
Michele Kennedy  
Spencer Jefferies  
Michelle Nicholson  
Caroline Norrie  
Anne O Donoghue  
Debbie Pennington  
Christopher Pook  
Garry Samett  
Fatima Shafiq  
Simon Clark  
Sophia Dempsey  
Dorota Thomas  
Lester Truter  
Paul Wallington  
Emma Conwell  
Mr Alexander K Muir  
Dominique Barnett  
Lynne Roberts  
MR Anthony Maxwell  
Mr Gavin Scillitoe  
Mr Dietmar Kuchemann  
MR James Markham  
Mr Philip Sherrell  
Mr Mark Robinson  
MR Duncan SAmbrook  
Mr Duncan Sambrook  
Ms Polly Barker  
Mr Andree Gregory  
Caroline Steenberg  
Charles Wates  
Callington Estates Ltd  
Lydia Investment Holdings  
Legal and General Property Partners  
Local Plans  
Jonathan Fox  
Kevin J M Doyle  
Lydden Group Limited  
Louise Newman  
matthew Banks  
Nicola Brownbridge  
Simon Wood

Denise Davidson  
London Borough of Camden  
Jo Valentine  
Janet Cooke  
Malcolm Payne  
Mr R S Rihal  
J Irvine  
Mr Naseer Dean  
Peter Luder  
Charles Hickie  
Simon Tarasiuk  
Mrs D G Clark  
Mr Murray Hunter  
Donna Alley  
Mr Mark Broxup  
Nigel Lane  
Mr K R Tweed  
Peter Pendleton  
Huw Morris  
Ms Phillipa Jeal  
Robert Beeby  
Mr A Gordon-Walker  
Ms Lalji Vakaria  
James Miller  
Mr P Scott  
Mr Ian Fairweather  
Mr Seamus McBride  
Mr A R Lone  
Mr John Broughton  
Mr Ian Taylor  
Alex Williams  
Michael Stephen  
Lady Berkeley

Ms Natasha Rhoden  
Rachel Colenso  
Mrs C Albury  
Ms Christine Miller  
Mrs Yeldham  
Naseem Aboobaker  
Simon Hutchins  
Duncan Braithwaite  
Mr Gerald R Williams

Mr Martin Coombs  
Penny Barltrop  
Sarah Hoad  
Ms Meshel Rhooms  
C Edwards  
Tom Bogdanowicz

mr alan shard  
Ms Elaine Derx  
Mr Mark McGovern  
Mr Michael Damjanovic  
Mr Paul Wallis  
Mr Paul Reardon  
Sinead Kelly  
George Creamer  
Mrs Laura Fletcher-Gray  
mr Larry Evans  
Phillippa Twihig-Howell  
Juliet Childs  
Alice Kennedy  
Shivesh Seedhar  
Mr Barry sellers  
Adam Shepherd  
Mrs Martina Connolly  
Natalie Chan  
Planning South  
Frances Devane  
Sinead Loftus  
Ms Diane Hill  
Mr Mike Potter  
Linda Beard  
Cllr. Paul White  
Ms Lynne McNulty  
Nicola Grant Nicola Grant  
Mr Peter Peter Carpenter  
Katie Parsons  
Mrs Melanie Murphy  
Sarah Wilks  
evelyn Jones  
Ms Susan Jones

All England Lawn Tennis Club (the A  
Michael Atkins  
The Collective  
jack conroy  
LondonBorough Of Merton  
Mr Chris Peay  
Celeste Giusti  
Safestore  
Lucy Lewis

Putney High Street Development LLP  
Bendon Valley Lydden District  
simon ingyon  
Mary Manuel  
Tim Price  
mr Nigel Nisbet

Mr Tim Bellenger  
Ms Susan Roscoe-Watts  
Peter Eversden  
Mr M D Elengorn  
Jamie Colonna  
Muhammad Kashif  
Tara Butler  
Richard Cleminson  
Ms J Leigh  
Nicholas Devonald  
Pamela Butler  
Jackie Parker  
Mr Mark Stevenson  
Tim Bergin  
Mr Gordon Vincent  
Sarah Rackham  
Mrs J Gibson  
Rev Heinz Toller  
Scott James  
Rev D C Premraj  
Mr Harold Ellis  
Rev Steve Rouse  
Mr Athos Mamas  
Occupants  
Mrs A Harding  
Mrs J McKnight  
Mariene Farguson  
Mr C Jones  
Mrs J Buckley  
Doris Leaman  
Jeremy Clyne  
David Stanford  
Merial O'Dowd  
Paul Evans  
Mr Raymond Thomas Gittins  
Rev Hugh Gear  
Mrs Rosemary Irving  
Mr Peter Murphy  
Laura Ross  
  
Sue Morecroft  
John Clark  
Matthew Bonning-Snook  
Paul Koopman  
Ms Harriet Shelton  
Veronica Saunders  
Fiona Mackay  
Mr Damon Reynolds  
Lucy Owen  
Harvey Heath

Mark Batten  
Azzees Minott  
Cllr Graeme Henderson  
Labour Group  
Hugh gibbs  
Mr James Thompson  
National Grid  
Ruby Wilkinson  
Mr Steve Mitchell  
Jack Dewey  
Andrew Ryley  
Richard Taube  
Charlotte Williams  
Armin Shokravy  
Bridget Fox  
John Cutler  
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Matthew Gore  
Cllr Graeme Henderson  
Sarah Temple  
HGH Consulting  
Henry Asson  
Charles Rose  
Tabitha Lythe  
Richard Katz  
Cerys hulbert  
Dena Dabbas  
Belinda Sosinowicz  
Melanie Getty McManus  
Aira Temporal  
Matthew Pigott  
Laura Jenkinson  
Oliver Froy  
Mr Philip Robin  
Mark Connell  
Julian Shirley  
Richard Tilley  
Jon Roshier  
Mr John M Dyke  
David Johnson  
Nigel Barnikel  
Daniel Lampard  
Chris Thomas  
Mr Greg Dowden  
Mr Nicholas Thompson  
Mr Hugh Bullock  
Catherine Widdowson  
Mr Jon Bradburn  
Matthew Gibbs  
Mr Huw Williams

Charles Reed  
Kate Matthews  
Nigel Abbott  
Moray Pike  
Stewart Ross  
Miss Anna Kruczkowska  
Mr Indrajit Patel  
Mrs Jackie Coward  
Sarah Banham  
Rev J McKinney  
Mr Peter Twelftree  
Walter Xerri  
Irene Adams  
Jonathan Brown  
David Barttelot  
Kristina Fitzsimmons  
J Belle  
P J King  
Malik Gul  
Mr Paul Birtwistle  
Nicholas Wilson  
Jane Morley  
Elizabeth Collingridge  
Mr Stewart  
John Parmiter  
David Irwin  
Janet Duff  
Bridget Rosewell  
Mrs Liz Walton  
Ms P Ryan  
Ms Margaret Brett  
Ms Jane Jephcote  
Harriet Strickland  
Hugh Thompson  
H J Mylchreest  
David Mcgee  
Mr David Devons  
Kim Dewdney  
Robert Allen  
Henry G Copeman  
Philip Bradley  
Mr Geoff Strawbridge  
Anastasia Limited  
Miss Jenny Stafford  
Miss Rachel Allwood  
Philip Whyte  
Morrison Supermarkets Plc.  
Berkeley Group Ltd  
Chris Brodie  
Nick Steiner

Mr Jeremy Evershed  
Craig Tabb  
Mr Peter Mail  
Mr Jon Roshier  
Tom Sweetman  
Philip Villars  
Dr David Lewis  
Mr Nick Green  
Mr Sean Tickle  
Mr Richard Tilley  
  
Barry Cansfield  
Steve Walters  
Mr Jonathan Marginson  
Mr Kenworthy Justin Kenworthy  
Ms Elizabeth Howe  
  
Mr Robert Le Clerc  
Mr Damien Holdstock  
Sinead Morrissey  
Mr Nigel Garrett  
Julia Krause  
Mr Tim Holtham  
Mr Blythe Dunk  
  
Graham Timms  
Hayley Ellison  
M.D. Washbourne  
Jason Lowes  
Mel Barlow-Graham  
Adam Donovan  
Lindsay Garratt  
Mr Ed Norris  
Mr Michael Wellock  
Mr Sean Tickle  
Jonathan Stoddart  
Melanie Blanchard  
Trevor Standen  
Tim Bryne  
Sinead Morrissey  
Mr Ben Fox  
  
Ms Claire Evans  
Mr Jonathan Smith  
Julian Austin  
Ben Ford  
Jenny Hebb  
Sir Terence Clark  
Ms Jennifer Watson  
Mark McGovern

London Fire and Emergency Planning

Mr & Mrs Cox  
Mr Steven Rogers  
Chris Brodie  
Phil Errington  
Ms Lynne Evans Lynne Evans  
Charlotte Amor  
Mr Aidan Thatcher  
Mr Malcolm Souch  
Mr Adam Brindle  
Margaret Heriot  
Carol Dodds  
Pamela Shaikh  
Mr William Manser  
Mr Denny Gray  
Mr Mike Smith  
Mr Pete Errington  
Mrs A Todorova  
Mrs S Luce  
Mr Chris Pritchard  
Mr Phillip Giraud  
Costco Wholesale Uk Limited  
Mrs Isabel Wooller  
Miss Helen Wada  
Workspace Glebe  
Mr Mattinson  
Mr Charles Muriithi  
Tom Burke  
Mrs Karen Robinson  
Scott Hammond  
Addition Land Ltd & Network Rail  
Zurich Assurance Ltd and Princess S  
Peabody  
Ian Dubber  
TR Property Investment Trust PLC  
Carmelle Bell  
Mr David Wilson  
Mr Peter Mail  
CEMEX  
Cadent Gas Ltd  
Mark Fisher  
Colin Campbell  
Mr Andrew Catto  
Terry Smith  
Cyril Richert  
Monica Tross  
Ballymore Group  
James Hepburn  
Ms Sharon Goodridge  
Mr Colin Beswick

Altine Topping  
John-Rhys Davies  
Claire Dickinson  
Chris Gascoigne  
Steve Simms  
Diana Thomson  
Mr Paul Henry  
Clifford Rance  
Carmelle Bell  
Miss Poppy Carmody-Morgan  
Amy Birch  
Chloe Ballantine  
Dan Fyall  
Mark Dodds  
Lucy Farrow  
Ben Kelly  
Philip Allard  
Laura Joseph  
MR ROB PEARSON  
Luis Ortega Govela  
Jennifer Watson  
David Wilson  
Tim Rainbird  
Angie Fenton  
Mr Leo Cunningham-Baily  
Robert Deanwood  
Mr Chris Brown  
Ms Helen Courtney  
Mr Roger Birtles  
  
Ms Angie Fenton  
Anna Snow  
Mandip Sahota  
Kevin Watson  
David Watson  
Kieran Wheeler  
Adam Conchie  
Viktorija Saveca  
Samuel Elliott  
Mr Simon Ffoulkes  
Jessica McSweeney  
Guy Bransby  
Hannah Whitney  
Richard Springett  
watson  
Mr Roger Birtles  
Mr Nicholas Taylor  
Alex Graham  
Craig Slack

Mr Iqbal Sacranie  
Mr F Valimohamed  
Mr Judge  
Ms Kathleen Hardy  
Madan Singh  
Mr Harpal Rehal  
Mr Mohan Singh Dhamrait OBE  
Mr Satpal Singh Rayit  
Mr Prem Dhall  
Mrs Latif Khan  
Venerable Phrakru Samu Lom  
Rev David Gillman  
Helen Simmons  
Father David Stanley  
Inspector L Strong  
Jane Eades  
Mr Jim Grundy  
Ben Addy  
Westley Pickup  
Mr Michael Howie  
MR David Annett  
Mr Nathan Hardman  
Mr Gordon Ross  
Ms Amma Poku  
Mr Andrew Brown  
Judith Roscoe  
Waters  
Mrs Patricia Poulter  
Featherstone  
Mr John Archer  
Victoria Diamond  
Mr David Guyan  
Mrs Susan Houlding  
Ms Yuko Suganuma  
Mr Jonathan Wade  
Mr J Adams  
Mr Didier Ryan  
Lammas Motors  
Mr Alistair Brown  
Simon Vince  
Jessica Adams  
Mr and Mrs Clive and Gilda Rees  
Resinvest IOM Two Limited  
Akzo Nobel (CPS) Pension Scheme  
Charlie Roe  
Ms C.M Sewell  
Mr and Mrs Yvonne and Tom James  
Sally Ellaway  
Jonathan Ellerbeck  
Barbara Iascelles

James Armitage-Hobbs  
Iain Buzza  
Geogia Hillstead  
Anna Russell-Smith  
Paul Burley  
Stefanie Mizen  
Julian Carter  
Vanessa Clipstone  
Ms Analeises Smith  
Emily Cochrane  
Rory Joyce  
Mr Mark Tombs  
Neil Wells  
Tabitha Lythe  
Richard Lemon  
Richard Leman  
Audrey O'™Mahony  
Thomas Wessely  
Hannah Lorna Bevins  
Mr Alan Piper  
Iain Buzza  
David Roach  
Tom Lawson  
Mr David Clare  
Healthwatch Wandsworth  
Mr Joe Wilson  
Cllr Paula Walker  
Shaun MacArthur  
Nia Fraser  
Caius House  
Laura Jenkinson  
Natalie Rowland  
James Elliott  
Emily Disken  
Mr John  
Ms Emma Gill  
Jodane Walters  
Miss Claire Stafford  
Claire Stafford  
Kirsty Turner  
Ellen Hudspith  
Generator Developments LLP  
Miriam Howitt  
Laura Kelly  
Panorama Antennas  
David Penniston  
Schroders  
St William Homes  
Steve Pinto  
Workspace Group

H.P Libby	38 Havelock Terrace Ltd
Victoria Lloyd-Roberts	Andrew Cox
Stargas Nominees Limited	Vernon Herbert
Karen Jones	Charterhouse Property Group
Mr Michael Bryn-Jones	Eleanor Byrne
Stephen Luxford	Rebecca Sladen
Ben Marks	Fodor Eszter
Andrea Maynard	Battersea Parkview Ltd
Carolyn McMillan	Innova Investments Partnership
Mr Andrew Simpson	Kingston University
Sophie Lancaster	Tim Kelly
Marcia Gillings	Adam Price
Rockspring Property	Andrew Dorrian
London Borough of Hammersmith & Ful	Bernard Construction UK
City Of Westminster	Mark Smith
Liz Wood-Griffiths	Cllr Rosemary Torrington
Gemma Lloyd	Mr Peter Carpenter
Lend Lease	Rachel Wang
Andrew Maunder	Gavin Scillitoe
Ms Rachel Smalley	McDonalds PLC
Ms Allan Kate	Ms Carly Cudmore
Ms Barbara Adolph	Mr Ross Anthony
Ms Alison Dale	McDonald's Restaurants Ltd
Mr Stephen Dean	A2 Dominion
Ms Tina Dias	Balham Properties LLP
	Mr Andrew Watson
Karly Olsen-Haveland	Mr Matthew Wilcock
Mr dennis austin	Kayleigh Wyatt
Malcolm Newton	Mr Joe Martyn
Harriet Booth	Mr Colin Molyneux
Nigel Summerley	Anthony Seale
Vincent Salih	Joanne Capper
Nathan Hall	Miss Alison White
Paul Dolan	Mr Robin Bishop
Samantha Powell	Michael Webber
H Monger	Mr Dermot Cremin same
Peter Deakins	Mr David English
Emma Broadbent	Ms Sue Mallia
Tiffany Mallen	Mr Colin Proctor
Tasha Hurley	Mr Matthew Tiller
David Wilson	Mr Steven Fannon
Nicky Mchugh	Mr Joseph Cairns
Mark Dickinson	Dr Annabelle Mooney
John Goergoulas	ms susan saker
Luke Sumnall	Mrs Maria de las Nieves Carazo Minguez
Catriona Fraser	Mr Terence Simpson
Alex Christopher	Mr Daniel Mula Gracia
Josephine Vos	
Lucy Simpson	Mr Simon Stokes
Simon Owen	Lois Davis

Laura Hutson  
Ms Lauren Miller  
Ms Helen Oakerbee  
Steve Diamond  
Brian Albuquerque  
David Tidley  
Mark Hunter  
Jon Howells  
Robert East Robert East  
Rob McNicol  
Hassan Ahmed Hassan Ahmed  
Giorgio Wetzl  
Guy Bridger  
Molly Morris  
Sara O'Donnell  
Simon Rogers  
Grant Leggett Grant Leggett

Mr Hutchins Simon  
Mr Pawel Pietraszek  
Kathy Lowe  
Julian Berry  
Amec Staff Pensions Trustee Limited  
Zair Berry  
Frank Burgess  
Karen Carden  
Richard Carden  
Paul Clarke  
Oliver Cleaver  
Andrew Duncan  
James Griffin  
Nick Pendlebury  
Peter Hickman  
John Locker  
Chris Medland

## Appendix 1B: List of Respondents

<b>Consultee Full Name</b>	<b>Consultee Organisation Details</b>	<b>Agent Full Name</b>	<b>Agent Organisation Details</b>
	Highways England		
	Natural England		
	NHS Property Services Ltd		
	Wandsworth Cycling (London Cycling Campaign)		
A C McCarthy	Pimlico Forum		
Adelyne De Bryas			
	AJDK	Katie Gwilliam	Rolfe Judd Planning
Alaina Macdonald			
Alan Pates			
	Callington Estates Ltd & the Callington Trust	Alex Smith	Simply Planning Ltd
	All England Lawn Tennis Club (the AELTC)	Emily Cochrane	Rolfe Judd Planning
Andrew and Anya Vickers			
	Asda	Mr David Brown	Newsteer
Audrey Julienn	RATPDev	John Cutler	
	Axis Construction	Joseph Hickling	Boyer Planning Ltd
Ben Allpass			
Brendan Conway			
Caroline Hartnell			
Caroline Marston	Martson Properties	Mr Paul Watson	Phillips Planning
Caroline Norrie			
Charles Rose	City Planning		
Chris Girdham	Cory Riverside Energy	Helena Burt	Rolfe Judd Planning
Chris Poll			
Clare Graham	Open Spaces Committee Battersea Society		
Cllr. Paul White			
Cllr Aydin Dikerdem			

Cllr Graeme Henderson			
Cllr Mike Ryder			
Cllr Graham Loveland			
Cllr Peter Dawson			
	Covent Garden Market Authority	Mr Philip Robin	Jones Lang Lasalle
Cyril Richert	Clapham Junction Action Group		
Dandi Five Ltd Dandi Living		Mr Mark Thomson	Savills
Deborah Phelan			
Diana McCann	The Blue Green Economy		
Dr Alexander Edwards			
Dr Antonio Fidalgo			
Dr Asif Din			
Dr David Curran			
Dr John Fletcher			
Dr Rosena Allin-Khan MP			
Dr Samuel Clifford			
Dr Stephen Bieniek	Wandsworth Liberal Democrats		
	DTZ Investment Management Limited	Mr Jeremy Evershed	Montagu Evans LLP
DTZ Investors		Neil Wells	Quod
Elizabeth Hopkirk			
Elly Price			
Emma Broadbent	London Rivers Officer South East Rivers Trust		
Francesca Abbiati			
Frank Burgess			
	Ipsus Developments Ltd	Grant Leggett	Boyer Planning Ltd
Greystar Europe Holdings Ltd,	GreystarEurope Holdings Ltd,	Nona Jones	Planner DP9
Hassan Ahmed	GLA		
Helen Simmons	Nightingale Hammerson		

H Monger	London Historic Parks and Gardens Trust		
Ian Harrison	Downing	Mrs Jan Donovan	Rolfe Judd Planning
Imperial College London		Charlotte Orrell	Senior Futures Consultant Icen Projects
Isabella Jack	Sustainable Development Advisor Natural England		
J.B Paterson			
Jane Aliband			
Jan Lloyd	CEO Covent Garden Market Authority	Mr Philip Robin	Jones Lang Lasalle
Jean Millar	Beautify Balham		
Jeanne Rathbone			
Jesse Honey			
John Locker			
John Turner	Ballymore Group	Tom Lawson	Rolfe Judd Ltd
Jon De Maria			
Josephine Vos	Transport for London		
Julia Raeburn	Sutherland Grove Conservation Area Residents Association		
Julie McPhillips			
Julie Sullock			
Katie Parsons	Historic Environment Planning Adviser Historic England		
Kiki McDonough			
Kin Development		Ben Ford	Quod
Kumar Varma			
Labour Group	Labour Group		
Laura Cole			
Laura Hutson	Sport England		
L Cox	Pimlico FREDA		
Legal and General Property Partners	Legal & General Property Partners	Neil Wells	Quod

	(Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited		
Linda Hudgins			
Lloyd Peters			
Lockguard Ltd		Mr David Shiels	
Lois Davis	Co-ordinator Wandsworth Green Party		
Lucinda Robinson	Marine Management Organisation		
Mark Hale			
Mary Buckley			
May Hale			
McDonalds PLC	McDonalds PLC	Mr Ben Fox	Planware
Meredith Hyde			
	Metropolitan Police Service		
Michael Atkins	Senior Planning Officer Port of London Authority		
Michael Leigh			
Michele Bailey			
Miriam Howitt			
Miss Anna Robotham			
Monica Tross	Secretary to planning committee Battersea Society		
Mowbray Jackson			
Mr Andrew MacMillan			
Mr Andrew Simpson	South West London and St George's Mental Health NHS Trust	Anna Russell-Smith	Montagu Evans
Mr Angus Robertson	Alton Action		
Mr Ben Roberts			
Mr Ben Wrighton	Watkin Jones Group	Sam Stackhouse	Montagu Evans LLP
Mr Brendan Foley			
Mr Chris Brodie			
Mr Chris Thomas			
Mr Christopher Buck			

	Western Riverside Waste Authority (WRWA)	Mr Christopher Collett	Carter Jonas LLP
Mr Christopher Hayhurst	Wandsworth Borough Council: Housing Strategy and Development	Miss Rochelle Flemming	Tetra Tech Planning
Mr Darren Bender			
Mr David Patterson	Tooting Liberal Democrats		
Mr David Wilson	Thames Water		
Mr Gavin Chandler			
Mr Graham Barrett	Protean Developments	Ms Claire Clark	Rolfe Judd Planning
Mr James Murphy			
Mr James Thompson	Northport FPR Limited	Mr Kevin Goodwin	KG Creative Consultancy
	CBRE	Mr Jeremy Evershed	Montagu Evans LLP
Mr Jeremy Trotter			
Mr Joe Palmer	AFC Wimbledon		
Mr John Burke			
Mr John Darke			
Mr Malcolm Souch	NHS London Healthy Urban Development Unit (HUDU)		
Mr Marc Newey	Roehampton Club Ltd	Sarah Temple	
Mr Mark Poulter			
Mr Martin Bonham			
Mr Michael Priaulx	Swifts Local Network: Swifts & Planning Group		
Mr Mike Fawcett			
Mr Nicholas Newland			
Mr Nick Symons			
Mr P Coulson	Deodar, Merivale & Florian Roads Residents' Assoc.		
Mr Richard Fox			
Mr Richard Norton			
Mr Robert Arguile	Chair The Putney Society		
Mr Robert Linton			

Mr Robert Mansell			
Mrs Beryl Leigh			
Mrs Celia Scott	Dolphin Square Preservation Society		
Mrs Heather Graham			
Mrs Louise Cole	Representative Wimbledon Swift Group		
Mrs Michelle Praest			
Mrs Ruth Marie Pates			
Mrs Sarah Rayfield			
Mrs Sue Rolfe	Werter Road Residents		
Mr Tom Coates	National Planning Adviser Theatres Trust		
Mr William Glover			
Mr Will Lingard	CBRE		
Ms Angela Maxwell			
Ms Bridget Fox	(South East) The Woodland Trust		
Ms Carol Rahn			
Ms Claire Baldwin			
Ms Elizabeth Crowther-Hunt			
Ms Geraldine Talbot			
Ms Gill Allen			
Ms Jane Briginshaw	Tooting Bec and Broadway Neighbourhood Forum		
Ms Janet Kidner	Landsec	Guy Bransby	Jones Lang LaSalle Ltd
Ms Julia Bott			
Ms Libby Lawson	Tooting History Group		
Ms Margaret Brett	Southfields Grid Residents' Association		
Ms Sarah Wilson			
Ms Susan Jones			

Ms Ute Lynch			
Pam Davies			
Paul Dolan			
Rachel Holmes	Environment Agency		
Rebecca Skinner	Peabody and Mount Anvil	Miss Ailish Collins	Rolfe Judd Planning
Riccardo Composto	Tooting Healthy Streets		
Ron Mobed			
Royal Borough of Kensington and Chelsea Pension Fund	RBKC Pension Fund	Mr Joe Wilson	CBRE Ltd
Roz Lloyd-Williams	The Junction BID		
Safestore		Matthew Lloyd Ruck	Savills
Schroders	Schroders Real Estate Investment Management	Jeremy Castle	Deloitte LLP
Shahina Inayathusein	London Underground Ltd		
Shirley Dunn			
Spencer Barnshaw			
Spencer Jefferies	National Grid	Matt Verlander	Avison Young
Stephen Knowles			
Steve Fannon			
Steve Kersley	Spencer Cricket		
Stuart Gulliver	Albion Riverside	LM Durrant	Chairman and Managing Director DPDS
Sue Mobed			
Susie Morrow	Wandsworth Living Streets		
Suzanna Kawalek			
Suzanne Eske			
Terence Brown	Wandsworth Friends of the Earth		
The Arch Company	The Arch Company	Alex Christopher	Turley Associates
The Collective			
Tim Price			
Toby Gawin			
Tony Burton	Wandle Valley Forum		

Tony Hambro	St George's Square Residents' Association		
TR Property Investment Trust PLC	TR Property Investment Trust PLC	Mr Chris Brown	Rolfe Judd Ltd
University of Roehampton	University of Roehampton	Henry Brown	Turnberry Planning
	Style and Space Contractors Limited	Jeff Field	BNP Paribas Real Estate
VSM Estates	VSM Estates	Freya Turtle	Turley Associates
Wilkinson			
Workspace Group	Workspace Group PLC	Laura Jenkinson	Avison Young
Zbig Blonski	Planning Division Regeneration & Housing Department London Borough of Lambeth		

## Appendix 2: Consultee letter / email to Consultees

Dear Consultee,

Consultation on the first draft of the Local Plan ('Pre-Publication Version'), Monday 4 January – Monday 1 March 2021

We are now consulting on the first draft of the Local Plan, known as the 'Pre-Publication' version. The Local Plan sets out a 15-year strategic vision, objectives and the spatial strategy for the borough, as well as the planning policies and site allocations that will guide future development. The Local Plan looks ahead to 2038 and identifies where the main developments will take place, and how places within the borough will change over that period.

The views of the community are at the heart of the planning process, and we would like to hear your thoughts on the first draft. This consultation is open to everyone.

### What are we consulting on?

The consultation is on the 'Pre-Publication' version of the draft Local Plan, the supporting Sustainability Appraisal, and the Policy Map Changes document, which explains how the spatial designations have changed as part of the draft Local Plan. These documents can all be viewed on the Council's website as follows: [www.wandsworth.gov.uk/draft-local-plan-pre-publication](http://www.wandsworth.gov.uk/draft-local-plan-pre-publication)

The website also provides more information about the Local Plan review process, including the timetable and links to various other supporting and evidence base documents which underpin the Local Plan.

### How to respond

You can respond in the following ways:

Online through the 'Draft Local Plan Consultation Portal', which can also be accessed through the website listed above.

By email to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk).

By post to Planning Policy, Environment and Community Services, Town Hall, Wandsworth High Street, London, SW18 2PU.

We would be grateful if you could please respond electronically, where possible, by using the online Consultation Portal. If you are responding by email or post, please use the 'Response Form' that is available to view and download from the website listed above.

All responses must be received by 11.59pm on Monday 1 March 2021. Please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

## What happens next?

Once the consultation closes, we will analyse and consider all of the responses received. These will be used to inform the next draft of the Local Plan, commonly known as the 'Publication' version. There will be a further opportunity to view and comment on the Publication version in the autumn of 2021, before the Plan is submitted to the Secretary of State for examination in public by an independent Planning Inspector.

## Special considerations for the COVID-19 pandemic

Due to the ongoing COVID-19 pandemic, and acting on the advice from the government, the Council will not be making hard copies of the consultation documents and response forms available in the Town Hall or the borough's libraries. An Addendum to the Council's Statement of Community Involvement has been published which sets out the temporary changes to our standard practice which will apply to this consultation. This can be viewed on the Council's website as follows: [www.wandsworth.gov.uk/statement-of-community-involvement](http://www.wandsworth.gov.uk/statement-of-community-involvement)

If you are experiencing any difficulties accessing the consultation documents or the response form online, please contact the Planning Policy team by email at [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk) or call 020 8871 7620 and ask to speak to a member of the Planning Policy team.

## Why have you received this?

You have received this notification as you have previously engaged with the Wandsworth Planning Policy & Design team. The Council is committed to ensuring that personal data is processed in line with data protection legislation and principles, including keeping data secure and ensuring that it will not be shared with any other organisation. The Council's Privacy Notice is published on the Council's website: [www.wandsworth.gov.uk/privacy](http://www.wandsworth.gov.uk/privacy)

We hope that you or your organisation will continue to take an interest in future planning policy and related documents. If you would like to continue hearing from us, then you do not need to do anything. If, however, you would prefer not to receive further notifications regarding planning policy and design matters then please notify us, preferably by email to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk) or by post to the address provided.

Yours faithfully,

**Christine Cook**  
Head of Spatial and Transport Planning

## Appendix 3: Engagement

### *Copy of pre-publication consultation details on Consultation Portal*

Press Release (Date)

Public consultation now underway to help shape future development for Wandsworth

Residents, businesses and community organisations are being asked what they think about a new Local Plan and if they have any comments on how future development would be guided in the borough.

A [consultation](#) is now underway to inform a new Local Plan that will set a framework to shape future development in the borough over the next 15 years.

The new Local Plan will include a series of policies and strategies to guide all of Wandsworth's future planning decisions. The Plan will shape how the borough's places will grow and develop – and in doing so, enable the protection of the borough's unique character and ensure everyone is able to benefit from its sustainable growth.

In order to enable the development and improvement of the places where local people live and work, whilst protecting and enhancing neighbourhoods and meeting the ever-changing needs of communities the council is asking people who live, work and visit the borough to take part in the consultation to make sure that the Plan works for everyone.

The information gleaned from the responses will be used to shape the next version of the Plan to help balance the social, environmental and economic ambitions for the borough,.

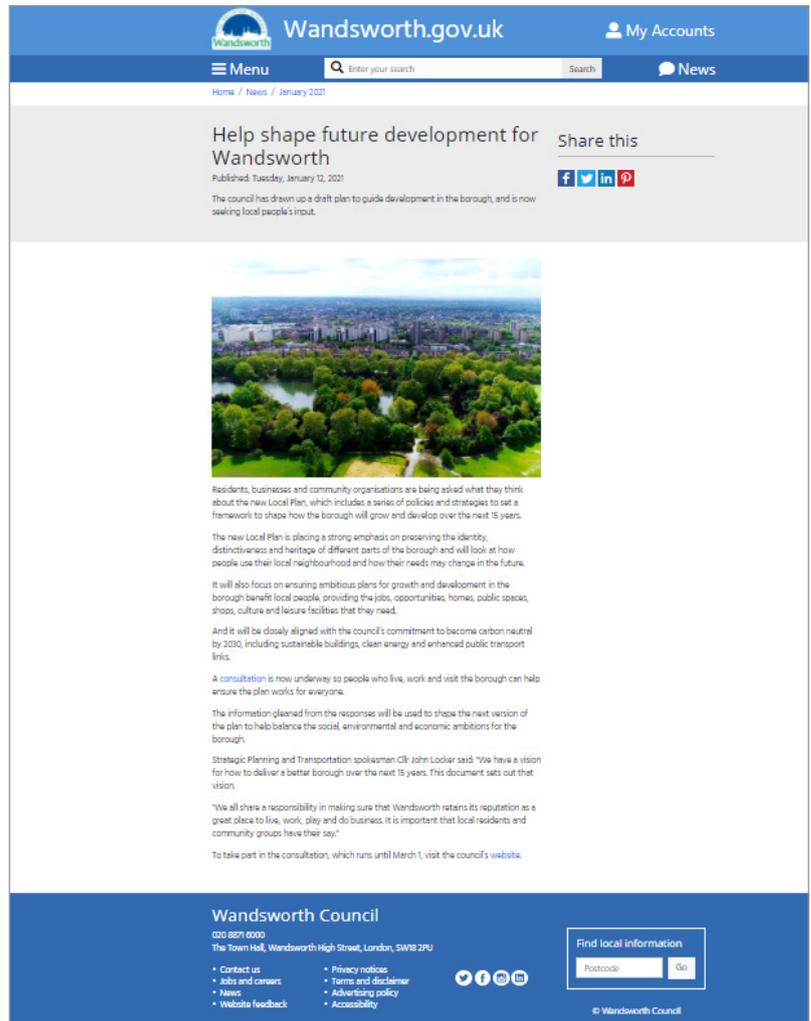
Strategic Planning and Transportation spokesman Cllr John Locker said:

(suggestion)

"We have a vision for the future of the borough and this document sets out that vision so that people can see where our priorities in bringing benefits and opportunities for all lie and how we plan to deliver a better borough over the next 15 years." "We all share a responsibility in making sure that Wandsworth retains its reputation as a great place to live, work, play and do business and it is important that local residents and community groups have their say."

To take part in the consultation, which runs until March 1, visit the [council's website](#).

# Website and Social Media Strategy



# WANDSWORTH

## DRAFT LOCAL PLAN

### Help us shape our future plan for Wandsworth

The Local Plan is at the heart of the council's vision for Wandsworth and sets out how we want to see our borough develop over the next 15 years up to 2038.



**What do you think?**  
Take part in the public consultation to shape the draft Local Plan until 1 March 2021.



To find out more and have your say, visit:

 [www.wandsworth.gov.uk/localplanconsultation](http://www.wandsworth.gov.uk/localplanconsultation)

 [www.twitter.com/wandbc](https://twitter.com/wandbc)



Designed and produced by Wandsworth Design & Print, info@wandsworth.gov.uk CC BY-NC 4.0

# Twitter Posts

**Wandsworth Council** @wandbc · 12 Jan

The Local Plan is a framework for enabling Wandsworth to develop & grow while preserving the distinctiveness of different parts of the borough & meeting the future needs of local people. The council wants residents' views to help shape the next draft.  
[wandsworth.gov.uk/news/news-janu...](http://wandsworth.gov.uk/news/news-janu...)



1    12    12

**Wandsworth Council Retweeted**

**Tooting Newsie** @tootingnewsie · 13 Jan

#Wandsworth is being asked what they think about the council's Local Plan, which aims to shape how the borough will develop over the next 15 years. The plan has a number of Area Strategies, including one for #Tooting – full info at [bit.ly/tnewsie253](http://bit.ly/tnewsie253)  
 #Battersea #Putney



Balham Newsie and 8 others

1    3    5

**Wandsworth Council** @wandbc · 13 Jan

We want local people's input into the Local Plan & have published a series of area strategies so you can see proposals for your neighbourhood Here's the first - #wandsworth town

- ➔ Read the area strategy [wandsworth.gov.uk/media/8128/wan...](http://wandsworth.gov.uk/media/8128/wan...)
- ➔ More about the local plan [wandsworth.gov.uk/news/news-janu...](http://wandsworth.gov.uk/news/news-janu...)



3    2

**Wandsworth Council** @wandbc · 14 Jan

We want local people's input into the Local Plan & have published a series of area strategies so you can see proposals for your neighbourhood Here's #NineElms

- ➔ Read the area strategy [wandsworth.gov.uk/media/8127/nin...](http://wandsworth.gov.uk/media/8127/nin...)
- ➔ More about the local plan [wandsworth.gov.uk/news/news-janu...](http://wandsworth.gov.uk/news/news-janu...)



1    2

**Wandsworth Council** @wandbc · 15 Jan

We want local people's input into the Local Plan & have published a series of area strategies so you can see proposals for your neighbourhood Here's #Putney

- ➔ Read the area strategy [wandsworth.gov.uk/media/8124/put...](http://wandsworth.gov.uk/media/8124/put...)
- ➔ More about the local plan [wandsworth.gov.uk/news/news-janu...](http://wandsworth.gov.uk/news/news-janu...)

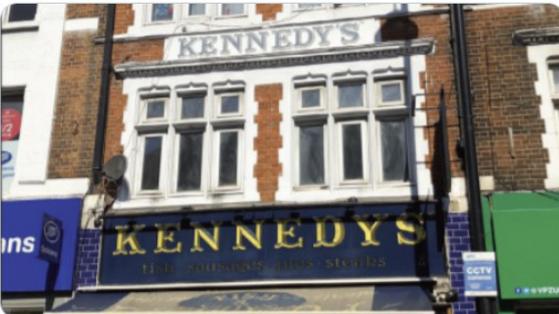


2    2

**Wandsworth Council** @wandbc · 18 Jan

We want local people's input into the Local Plan & have published a series of area strategies so you can see proposals for your neighbourhood Here's #Tooting

- ➔ Read the area strategy [wandsworth.gov.uk/media/8125/too...](http://wandsworth.gov.uk/media/8125/too...)
- ➔ More about the local plan [wandsworth.gov.uk/news/news-janu...](http://wandsworth.gov.uk/news/news-janu...)



2    1

**Wandsworth Council** @wandbc · 27 Jan

We want local people's input into the Local Plan & have published a series of area strategies so you can see proposals for your neighbourhood Here's #ClaphamJunction

Read the area strategy [wandsworth.gov.uk/media/8122/cla...](https://www.wandsworth.gov.uk/media/8122/cla...)

More about the local plan [wandsworth.gov.uk/news/news-janu...](https://www.wandsworth.gov.uk/news/news-janu...)



1 5 3

**Wandsworth Council** @wandbc · 19h

We want local people's input into the Local Plan & have published a series of area strategies so you can see proposals for your neighbourhood Here's #Balham

Read the area strategy [wandsworth.gov.uk/media/8123/bal...](https://www.wandsworth.gov.uk/media/8123/bal...)

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**Wandsworth Council** @wandbc · 2 Feb

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The council has published its draft Local Plan and wants your views. The Local Plan is a framework for enabling Wandsworth to develop & grow while preserving the distinctiveness of different parts of the borough & meeting the future needs of local people. It includes the council's vision for Wandsworth Town, Nine Elms, Clapham Junction, Tooting, Putney, Roehampton and Balham. Take part in the consultation to help shape the next draft.

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## Appendix 4: Summary of High-Level Issues and Council Response

The chapter and policy reference numbers in this document correspond to the Regulation 18 Local Plan Version (the Regulation 19 Version has updated policy numbering.)

The following views below are condensed summaries of some of the main responses to the Regulation 18 Document.

### Chapter 1 & 2: Introduction and Strategic Context, Vision and Objectives:

- The Local Plan consultation process should be more transparent and include key information, were some of the issues raised by Wandsworth Living Streets.
- There were concerns from the public about the new Use Class E and impact on commercial centres.
- Clapham Junction Action Group objected to the terminology 'Smart Growth'.
- TFL commented that the Plan should ensure that all development contributes towards achieving the mode split targets as well as the Vision Zero road safety objective. They also commented that some of the principles are not reflected consistently in individual site allocations.
- Supportive comments from various residents and Wandsworth Cycling.
- Historic Environment responded with detailed comments and expressed concern over tall building policies and the Urban Design Study recommendations that have not been carried forward into the plan.
- Miriam Howitt submitted various comments including the impact of Covid on housing numbers in London and the effect of Permitted Development Changes on dwelling numbers. Tooting Bec and Broadway Neighbourhood responded that COVID 19 recovery needs a joined-up approach on a range of policy topics.
- Comments were received from Alton Action group, Miriam Howitt and Steve Fannon, regarding lack of rail or underground transport services in particular for Roehampton. There should also be mention of the potential solution of extending the Northern Line, which has already been extended to Battersea within Wandsworth Borough which could be further extended across the borough to serve Clapham, Wandsworth Town, Putney and Roehampton.
- The Wandle Valley Forum were supportive but felt the Wandle Valley should be more of a centrepiece throughout the plan.

### *Council Response*

- Consultation on the Local Plan (Regulation 18) was successful and offered a significant improvement on previous consultations. Further, the recent appointment of a Senior Planning Engagement Officer offers the opportunity to develop approaches to planning policy consultations.

- The Council's response to consultation on Permitted Development Rights can be found at <https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/response-to-government-consultations/>.
- The term "Smart Growth" at paragraph 1.9 is used in reference to the Recovery Plan in response to the Covid-19 pandemic. Smart Growth – Since then, the Council has moved away from the term, and the Local Plan will instead use, 'Inclusive Growth'.
- References to car free developments have been removed from all site allocations.
- Support from Wandsworth Cycling noted.
- The Plan will be monitored through the AMR and Sustainability Appraisal indicators. This will allow identification of any issues arising from the implementation of the Plan. No changes to the Local Plan are considered necessary.
- The Local Plan covers post-pandemic considerations across its social, environmental and economic considerations. It embraces the Council's proposed Recovery Plan. It is recognised that there is significant uncertainty as to the impacts. However, the Plan provides a resilient, robust and flexible policy framework to allow appropriate responses. Comment noted. No impact on the Local Plan.
- Overcrowding on buses is an issue more suitable for the Local Implementation Plan and there are no current plans to extend the Northern Line to Roehampton.
- Comments noted.

**Sustainability Appraisal Comments:**

- Natural England supported the Sustainability Framework.
- The Environment Agency made the following comments;
  1. Clarification is required that all sites are subject to the Exception Test where necessary, even if the site is deemed to have passed the Sequential Test.
  2. The current appraisal does not quantify the ambition for net biodiversity improvements and therefore has no clear way of measuring those net improvements have indeed been met. It is therefore suggested that in order to actually better define this objective that there is some way to tangibly measure it.
  3. There is no reference or requirement of fully enclosed waste sites or required mitigation to offset any negative effects in air quality from waste sites operating not fully enclosed.

*Council Response*

- Comment from Natural England noted.
  1. The wording of the policy has been amended in response to the comments made regarding flood risk off site and the Exceptions Test. The Council's SFRA

Level 2 assessment provides details of the mitigation requirements of the Exceptions Test.

2. Wandsworth has prepared a Biodiversity Strategy and a Biodiversity Action Plan is forthcoming. This will set out any measurements that made in the future be used to ensure that the overall amount of biodiversity in the borough is increasing.
3. Proposed new paragraph to the supporting text of LP 13 signposts enclosure of new facilities and air quality, dust and noise impacts. It is not possible to require existing operators to enclose existing facilities unless they submit a planning application for their site. If a facility is in breach of its environmental permit, this is a matter for the regulator rather than the Local Plan.

## **Chapters 3 to 13: Placemaking – Area Strategies**

### **Nine Elms**

- Various groups raised issues with the proposed Nine Elms Pimlico Bridge:
  1. Private individuals living on houseboats near the south landing site at Nine Elms Pier were concerned about the impact on their residencies.
  2. Dolphin Square Preservation Society, Pimlico FREDAs, St George's Square Residents Association and other amenity groups were concerned about the impact on the historic gardens near north landing site.
  3. The need for a bridge in this location was queried, claiming a lack of demand.
  4. Cory Riverside Energy and other companies highlighted the need to protect the current uses of the wharves and safeguard other uses in the area, while also signalling a general support for the proposal.
- The boundaries of the BDTQ and the appropriate building uses for a site of SIL were raised by multiple respondents including the GLA, Workspace Group PLC, and Schrodgers Real Estate Investment Management. Workspacce and Schrodgers want more flexibility to provide non industrial uses throughout new developments. TfL highlighted the importance of retaining the bus depot.
- The Port of London Authority and Cory Riverside energy highlighted the need to protect the safeguarded wharves to ensure their ongoing viability.
- The Battersea Society responded that there should be reference to the Parkfield Industrial estate being part of Strategic Industrial Land.
- Ballymore Group support the allocation of the Kirtling Street Cluster.
- Quod obo DTZ Investors supported the site allocation at NE2 and proposed amendments to allow student accommodation.
- The LB Lambeth noted concerns about the policy provision for limited retail development outside of the two CAZ retail clusters within the area, questioning how this would be implemented and tested.

### *Council Response*

- The Project is aligned with the stated policy objectives of the Council, GLA and others (including the City of Westminster) to encourage healthier travel and support zero emission targets. Including the preferred site in the Local Plan provides greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river. Before submitting any planning applications, the design needs to be developed further and a location finalised. There will be further consultation with local residents and businesses, Londoners more widely and other stakeholders as part of this further design development, and any formal consents application will be subject to full public consultation, as part of the statutory planning process.
- The policy is already consistent with section 6.3 of the BDTQ framework and LP37, as intensifying industrial uses does not preclude office development from upper floors, and the intensification of industrial floorspace is a requirement of development. General council response is that this is not acceptable. LP37 4bc notes how SME office development is allowed on the condition that would result in an intensification of industrial uses. There is no need to widen PM G3 to achieve consistency.
- Paragraph 5.8 has been amended to include reference to Parkfields Industrial Estate.
- Support from Ballymore Group noted.
- The circumstances of the site might change over the plan period, and it is therefore not proposed to allocate the site for Purpose Built Student Accommodation.
- The policy approach to retail development outside of the CAZ retail clusters is based on the VNEB OAPF, however it is agreed that it should be specified that such uses should be subject to a sequential test where they exceed a threshold – intended to be 280 sqm (consistent with the Sunday trading threshold), rather than the 300 sqm threshold established within the adopted Local Plan.

### **Wandsworth Town**

- The Wandle Valley support and welcome recognition of the central contribution played by the Wandle in defining the character and identity of this part of the Borough and the contribution it can play in building physical and other connections but wish further strengthening within Wandsworth Town Area Strategy and the site allocations.

### Council Response

- The Wandle Valley area forms an important part of the Plan. This is demonstrated by including the Area as an Area Strategy for both the Wandle Valley and for Wandsworth Town which provides a key focus to the Wandle Delta Area. The recently published Wandle Delta Masterplan SPD, which forms part of the overall suite of planning documents contains much detail on the Wandle Delta area of the Wandle Valley thereby giving the area increased importance and has addressed several of the comments made in the representation. The Wandle Delta Masterplan SPD also gives further detailed guidance complementary to the placemaking policies PM 2 and PM 10.

## Clapham Junction

- The GLA and various developers have emphasised that a new Opportunity Area and associated boundary for Clapham Junction should be contained in the Local Plan to reflect the London Plan's identification of the area as a designated Opportunity Area (OA) and more general opportunities for development.
- The Battersea Society commented that they support efforts to promote mixed-use development of the site CJ1 – Falcon Lane. However, the requirement for platform straightening works may be a disincentive to developers. Also, the tunnel is expected to be more pedestrian friendly but not mentioned how this will be achieved. The new site allocation largely repeats the 2016 version, but it now notes that the northern section of the site, adjacent to the railway, may be required for track/platform straightening works. Clapham Junction Action Group also commented on the Falcon Road bridge and need for enhancements.
- Imperial College London requested that The Griffon Studio Site is allocated as it has the ability to provide enhance public realm improvements and is appropriate for tall buildings.
- Nightingale Hammerson proposed that Nightingale House (105 Nightingale Lane) is designated as a site allocation.

## *Council Response*

- A boundary for the Clapham Junction OA has been added to the Local Plan with associated text of the Area Strategy updated to reflect a revised vision for the area, amended to include a vision for the OA. This includes the proposal for the development of a Masterplan SPD for the area comprising the Station and railway lands, and major site allocations adjacent to the station area which has the capacity to accommodate new housing, commercial development and infrastructure linked to improvements to the station and public transport connectivity. This development capacity is in addition to the identified capacity for growth within the York Road/Winstanley Regeneration Area.
- In bringing forward Site Allocations, there will be a requirement for improvements to Falcon Road under the Railway Bridge to make it more pedestrian friendly and to enhance linkages between the north and south sides of the railway.
- The site is considered to not require an allocation. See the Site Allocations Methodology Report. The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of 'what is a tall building'. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone.
- The site was assessed in the Site Allocation Methodology Paper, and it was concluded that the site does not need to be allocated.

## **Putney**

- The Putney Society gave a wide ranging response that allowed for detailed local knowledge to be incorporated into the plan through minor and major changes.
- Numerous responses from local people and Burstock Residents Association and Deodar/Florian/Merivale Residents Association objecting against the proposal to allow tall buildings along Deodar Road.
- Werter Road Residents commented that the plan should include a fairer strategy for all road users, to actively redress issues of crime and personal safety.
- TFL responded that any development on the Putney sites should be car free and existing parking should not be replaced to take advantage of the high PTAL.
- Port of London Authority support the reference to smart growth in the urban logistics hubs.

## *Council Response*

- Comments noted.
- The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of ‘what is a tall building’. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down.
- LP51 sets out that the Council will work to promote safe, sustainable and accessible transport solutions for all users.
- See LP53 for information regarding parking requirements for developments in high PTAL areas.
- Support noted.

## **Tooting**

- Wide ranging response from the Tooting Bec and Broadway Neighbourhood Forum which has informed the plan with specific local knowledge.
- The Tooting History Group highlighted the importance of Tooting’s historic buildings.
- St Georges NHS Trust were concerned about the narrow and rigid site allocation for St Georges Hospital (TO2).

- Tooting Healthy Streets, alongside the Neighbourhood Forum questioned the need for re-provision of car parking in the centre of Tooting.
- Sport England commented that Springfield Hospital Site has not been included and reminded the Council the site should include both active and passive sports.
- Dr Samuel Clifford commented that care should be taken to ensure the redevelopment of Tooting's indoor markets do not compromise the ability of stall holders to continue operating.

### *Council Response*

- Comments noted.
- Expanded policy PM6 to state that where appropriate public realm improvements should aim to celebrate the history of the area.
- The site allocation has been expanded to cover the whole site, which will give the hospital more flexibility in delivering its estate strategy. The wording of the policy has also been changed to clarify that non-medical uses are suitable as long as they do not prejudice the estate strategy.
- Paragraph 8.3 amended to remove incorrect reference to the RACS building.
- Subsequently the site allocation has been expanded to include the entire hospital and provide for a more flexible approach to development, in line with the emerging Estate Strategy.
- The Springfield Hospital site has been added to the list of site allocations.
- The Site Allocation sets out that the development must include the retention or reprovision of the market, and it is essential that as part of this the ability of traders to operate is not negatively affected. Policy LP 49 (Markets) sets out further detail on planning applications relating to markets, which would apply were one to come forward for this site. Changes have been proposed to LP 49 to clarify that planning permission as part of the redevelopment of a market will be subject to the operation of the existing market being ensured. In line with these changes, it is considered appropriate to clarify this within the text of the Site Allocation TO1 also.

### **Roehampton**

- Local residents, and members of the Alton Action group, queried the description of Roehampton as high in crime.
- Numerous residents of the Alton Estate raised issues with the proposed redevelopment of the estate. This is now in flux as Redrow have pulled out. Residents also questioned the idea that the area is confusing for visitors.
- NHS property services wanted changes made to RO3 to allow for more flexible development. Some were granted but car parking was deemed to be important due to the low PTAL of the site.
- Labour Group support the strategy, but more should be made of the need to create greater synergy between the Alton Estate and Roehampton Village.

- TFL are supportive of the proposals encouraging a modal shift to walking.

#### *Council Response*

- The statement relating to higher-than-average crime levels has been backed up by Indices of Deprivation 2019 data.
- The Local Plan sets out a vision and a framework for the future development of the area, stipulating what type of development (and of what scale) is permitted in different locations. The Local Plan itself does not directly provide investment in units. The inclusion of this sentence (and of a new policy on temporary uses) therefore seeks to provide clarity for developers (or other investors) on the acceptability in principle of short-term uses - including those which might otherwise not be acceptable in planning terms.
- Due to the low PTAL of the site it is expected that car parking will need to be reprovided.
- The Spatial Area Map for Roehampton has been amended to show a suggested new route from Tunworth Crescent to Richmond Park.
- Comment noted from TFL.

#### **Balham**

- Numerous local responses to the Sainsbury's car park site allocation (BA 1). Many support the site allocation, with a particularly detailed response from Ms Gill Allen. One representation was concerned about the loss of park and pedestrianisation of Bedford Hill.
- Beautify Balham wanted specific guarantees of support for their Balham in Bloom programme.
- Comments received regarding Cross Rail 2 which responders say should be disregarded for planning purposes as it will be delayed.
- TFL commented that given the high PTAL and opportunities for active travel, all residential and office development should be car free.

#### *Council Response*

- Support for BA 1 is noted. The site allocation does require the expansion of the Open Space to the north of the site. Policy. LP 51 contains details of the council's policy regarding the reduction in car usage. The details of any proposal for the site would be assessed as part of an application for planning permission. It is beyond the scope of the local plan to prescribe exactly what should occur in BA 1.
- Specific improvements to the public realm are not within the remit of the Local Plan; however, policy PM 8 codifies the councils support for developments that strengthens Hildreth Street Market.

- Comments noted. The Local Plan has been updated to reflect recent updates from TfL regarding Crossrail 2. It is still considered that it could come forward during the lifetime of the Local Plan and should therefore remain in the plan.
- The quantum of parking will be assessed on a case by case basis.

## **Riverside**

- Battersea Society want to see more integration of site allocations and have questioned whether RIV 12 should be part of Riverside. They have also commented on the feasibility of developing some sites after the pandemic (RIV 7 +8), as well as suggesting the area strategy take a more specific focus on sites closer to the river.
- There was support among local people for improving accessibility along the river and along the Thames Path.
- There was general support from Albion Riverside, Greystar Europe Holdings Ltd and Big Yellow Self Storage. Although they were keen to stress that the amenity of the area is not degraded by new development. (Albion Riverside).

## *Council Response*

- RIV 12 site has since been moved to the Outside a Spatial Area section. RIV7 allocation specifies the reprovision of employment space. Furthermore, Travis Perkins would be able to comment on any development that is proposed for the site through the application for planning permission. The plan is expected to run until 2038 and so while in the short-term development of the site may seem unlikely, the longer-term potential of the area justifies its inclusion. The Council agrees that improvements to pedestrian infrastructure would be needed. See LP 51 Sustainable Transport that details the council's support for developments that meet the Healthy Streets objectives.
- Support noted.
- Support noted.

## **Wandle Valley**

- Councillors, local people and Wandsworth Cycling were all supportive of the proposal to complete the missing link of the Wandle trail, as well as improving it for all active travel users.
- Southfields Grid Residents Association wanted more protection for King Georges Park to ensure it remains a community asset, rather than being taken over for commercial events and festivals.
- The Environment Agency wanted stronger wording on biodiversity, including the implementation of a 10m buffer habitat buffer either side of the river. This is also support by the London Rivers Trust.

- Marston Properties wanted the Lydden Road Locally Significant Industrial Area to support the inclusion of office development.
- Supportive comments from the Port of London Authority.
- Supportive comments from the Wandle Valley Forum but also wished to see more strengthening of Area Strategy

#### *Council Response*

- Support noted.
- The policy LP59 states that it has measures which have the potential to improve the park specifically for local communities. The proposals listed within the policy are focused on benefiting the local community through improvements to the park infrastructure and curation of cultural events.
- LP60 River Corridors has been amended to encourage the consideration of the Estuary Edges guidance provided by the Environment Agency. The supporting text of LP60 has been amended to require all management plans for riverside public spaces to include aims to restore riverside habitat and in-channel habitat where desirable.
- No change to the LSIA designation. This approach is consistent with recommendations made in the Council's Employment Land and Premises Study (2020), in which the considerations raised in the representation were thoroughly considered, including based on participation and input provided from the representor at that time.
- Support noted.
- Comments have been noted when revising Policy PM10.

#### **Outside**

- The Battersea Society are critical of OUT 2, 5 and 6, stating that they are unlikely to be developed in the future and that OUT 6 is not used as a care home as currently stated.
- NHS Property Services and the NHS Healthy Urban Development Unit both support the proposals for the medical sites but would sometimes like more flexibility within the site allocations.
- Dandi Five Ltd responded regarding OUT6 and request amendments to the allocation which seek to reflect the evidence and technical work undertaken relating to the site as part of the recent planning application (Ref: 2020/2560).

#### *Council Response*

- OUT2 - The site is not expected to come forward all at once but that the uses outlined in the allocation are met over time. OUT 5- The allocation has been brought forward following the owner expressing an interest in its redevelopment to help expand the healthcare facilities. OUT 6 - Comment on the current use

of the site is noted. The approach to managing developing proposals for co-living schemes is set out in Policy LP31 and is not repeated in this Site Allocation.

- The site allocation requires the re-provision and expansion of healthcare facilities and parking on site and should not be relocated to another area as it is very close to Balham town centre.
- Application ref. 2020/2560 was assessed against the adopted Local Plan, whereas Site Allocation OUT6 forms part of a new Local Plan. Policy LP31 does not permit the development of co-living units unless scheme address all requirements set out in the policy. Development proposals will need to be assessed on their own merits at the time when a planning application is submitted. The circumstances of the site might change over the plan period, and it is therefore not proposed to allocate the site for co-living.

### Comments on Site Allocations

- The comments made by private individuals and amenity groups touched upon various aspects covered by Area Strategies, including public realm, active travel and impact of the Covid-19 pandemic on the vitality of town centres.
- Several amenity groups and developers suggested a number of additional site allocations to be included in the Plan. Others suggested changes to existing allocations.

New allocations and other changes are proposed as follows:

- The capacity of Site Allocations was reviewed and refined in light of the requirement to follow a design-led methodology to calculating housing and employment land capacity. The capacity of each Site Allocations is now included in the Local Plan and the capacity of each Area Strategy updated.

The following changes are proposed to the Site Allocations as follows:

Four additional Site Allocations

- CJ6 Peabody Estate, St John's Hill; residential led mixed-use development (reinstatement of the Site Allocation from the adopted Local Plan).
- CJ7 36-46 St John's Road and 17 Severus Road, Clapham Junction; mixed-use development including commercial and residential uses.
- PUT6 55-61 Putney High Street; mixed-use development including commercial and residential uses.
- OUT5 Springfield Hospital, Burntwood Lane, Glenburnie Road; new and improved hospital facilities (reinstatement of the Site Allocation from the adopted Local Plan).

Three Site Allocations require their boundaries to be amended:

- CJ2 Clapham Junction Station Approach (small amendment to include further land up to the new Brighton Yard entrance).
- TO2 St George's Hospital (to include the whole of the Hospital)
- NE12 New Covent Garden Market Entrance Site (to include the Thessaly Road and Apex Sites).

Two Site Allocations have been removed due to limited development opportunity within the Plan period.

- OUT3 ASDA, Roehampton Vale; mixed-use including commercial and residential uses.
- OUT4 Wandsworth Prison, Heathfield Road; expansion of prison facilities and new residential development.

## **Chapter 14: Achieving Design Excellence**

### **LP1 Urban Design**

- NHS HUDU, Historic Parks and Garden Trust and Rolfe Judd generally supportive of policy.

General comments received from amenity groups and developers;

- Contradiction of policy in light of government changes in PD rights
- The Putney Society commented that the Policy should be clearer that innovative design will not be prevented
- Wandsworth Living Streets responded that visual examples should be included and aspirational design
- TFL comments that design should provide high quality access for pedestrians and cyclists
- Comments on design for off street service arrangements for commercial vehicles and servicing
- The Labour Party commented that the Council should provide assistance to residents wishing to close their streets for children to play and generally encourage developments to be more child friendly
- Liberal Democrats commented that they would like clarification on how solar panels and wind turbines fit into LP1
- NHS HUDU suggest wording to ensure that the design of buildings and spaces minimise environmental impacts and promote active design.

### *Council Response*

- Support noted.

- No Change – The agreement to proceed with making the Article 4 Direction (Class E to C3) was given by the Council’s Executive in June 2021.
- Policy LP1 to be amended to clarify that innovative design will not be prevented.
- Policy to be altered to include wording regarding floor design that includes access for pedestrians and cyclists
- LP53 provides adequate guidance to off street parking.
- LP19 will be expanded to ensure developments used by children satisfy requirements of London plan S4
- Proposals for renewable technologies will be assessed in line with policy LP10. The supporting text of policy LP10 states that renewable technologies such as photovoltaic cells, solar panels, ground and air source heat pumps and other forms of renewable energy are likely to be appropriate in many parts of the borough, subject to other policies within this Plan. Policy LP3 supports the principle of climate change mitigation alterations and adaption responses within the historic built environment when the development is designed
- This requirement is already stated in policy LP15 in accordance with established conservation best practice.

**LP2 General Development Principles**

- General support from Boyer obo Axis Construction, Rolfe Judd obo Ballymore Group, Port of London Authority, NHS HUDU
- The Blue Green Economy suggested wording possibly within Point D to consider circular economy principles extending to local capture and reuse where appropriate (e.g., rainwater).
- Clapham Junction Action Group objected to the listing of criteria in LP2
- No true privacy in urban gardens, roof terraces should be encouraged.
- Putney society and Clapham Junction Action Group requested more detail as to what constitutes ‘acceptable’ within the policy and felt it was open to interpretation

*Council Response*

- Support noted
- In line with policy LP13, the Council will support the circular economy and contribute towards London’s recycling and net self-sufficiency targets by safeguarding existing waste sites and identifying suitable areas for new waste facilities.
- Whilst the importance of protecting the amenity of existing occupiers is recognised, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics. There will not be a ‘one size fits all’ solution in relation to measuring the impact of development on the amenity of existing occupiers. This should be considered on a site-by-site basis. The supporting text of the policy clarifies that the Council will have regard to the most recent Building Research Establishment in assessing whether sunlight and daylight conditions are good. The application of policies is a

Development Management issue rather than a matter for the Local Plan to address.

### **LP3 The Historic Environment**

- Sutherland Grove Residents Association commented on completed schemes in the borough and detrimental impact on the character and appearance of the borough.
- The Mayor of London were supportive and also indicated that Wandsworth should include a policy to conserve, promote and promote the Outstanding Universal Value (OUV) of the Westminster World Heritage Site (WWHS).
- Comments received regarding the Councils procedure for maintaining the Historic environment and requests for strengthening of requirements for conservation areas for the next management strategy.
- Historic Parks and Gardens trust welcomes recognition of heritage assets of the borough
- Putney society support but also comment on the need to intervene when heritage assets are neglected not just as a result of an application
- DTZ Investment Management Ltd wanted amendments made to the policy regarding substantial harm criteria
- Rolfe Judd are concerned that the proposed policy is overly restrictive
- Clapham Junction Action Group generally support but wish the policy to demonstrate how it will enforce the listed elements

#### *Council Response*

- The application of policies is a Development Management issue rather than a matter for the Local Plan to address.
- In accordance with the London Plan, policies protecting the Outstanding Universal Value of World Heritage Sites (WHS) should be included in the Local Plans of those boroughs where visual impacts from developments could occur.
- The wording of Part H of the policy is considered appropriate.
- Support noted.
- The wording of Part F of the Policy is considered adequate.
- The wording of the Policy is considered adequate.
- The Council agree and have revised part F of the policy to clarify that it applies to buildings that make a positive contribution to the character of the area.
- The application of policies is a Development Management issue rather than a matter for the Local Plan to address. Part F of the policy is required to ensure compliance with national policy and guidance.

### **LP4 Tall Buildings**

- The Mayor of London and Historic England emphasised that Wandsworth should adopt a more prescriptive approach to tall buildings. Key issues include:

- 1) Minimum height for a tall building including for any local borough definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey [in line with the now adopted London Plan].
- 2) Maximum tall building heights that could be acceptable should be identified on maps within the Development Plan documents.
- 3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans, thereby restricting heights in areas outside these locations.
  - Some amenity groups such as The Putney Society, and private individuals suggested that policy LP4 Tall Buildings is too flexible, while others expressed concerns that the adopted policy on tall buildings is rarely enforced in planning decisions.
  - The Southeast Rivers Trust responded that the plan does not recognise the impact of overshading on river corridors and welcome a requirement for all riverside development to undertake a day, sun light and overshadowing assessment
  - Linda Hudgins objected to the policy which suggests the building of high rise at the end of Putney Bridge Road. Mary Buckley commented that there should be no developments permitted which will alter the density and character of Southfields
  - Network Rail wish the policy PM4 and LP4 are altered by designating the area south of CJ Station as an 'Opportunity for tall buildings cluster or landmarks' as this would attract well-designed high-density development focused around the transport interchange.
  - Deodar Merivale Florian Residents Association and numerous residents commented that high rise buildings should not be permitted further east along Putney bridge road from Putney high street

*Council Response*

- Officers recommend that policy LP4 should be amended to reflect the following requirements:
  1. Define tall buildings as buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower).
  2. Define mid-rise buildings as buildings which do not trigger the above definition, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower).
  3. Establish that tall buildings may only be an acceptable form of development in tall building zones, and that mid-rise buildings may only be supported in mid-rise and tall building zones.
  4. Prevent the development of tall or mid-rise buildings outside the identified zones; and
  5. Identify an appropriate height range for each tall building zone and present the identified height range on a tall buildings map. The policy will make it clear that development proposals exceeding the appropriate height will not be supported on design grounds.
- The impact of development proposals on the levels of daylight and sunlight will be assessed in line with policy LP2. This is not repeated in policy LP4. However,

proposals for tall building near the River Thames will also be required to comply with the London Plan policy D9, which includes a criterion requiring proposals to protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river.

- The Regulation 19 Local Plan includes a revised policy on tall buildings (LP4). The policy has been amended following the adoption of the London Plan in March 2021, which necessitated changes to the definition of ‘what is a tall building’. In accordance with the London Plan, the Plan also identifies zones where tall buildings will likely be suitable and provides maximum/appropriate building heights in each zone. Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. Consequently, the proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down. The application of policies is a Development Management issue rather than a matter for the Local Plan to address.
- Although, this comment was made in relation to the previous version of the policy, it has been considered when developing the revised approach to managing mid-rise and tall buildings. The mid-rise and tall building zones have been defined through a detailed analysis which is set out in the Urban Design Study. There is no evidence in the UDS would allow for the designation of areas further to the south of the station as tall building zones.
- The proposed zone at the junction of Putney High Street and Putney Bridge Road has been refined and scaled down when revising the approach to tall buildings.

### **LP5 Residential Extensions and Alterations**

- Query from Wandsworth Liberal Democrats on what is the housing SPD.
- The Putney Society responded that hard standings should be resisted where the crossover is effectively privatising street parking. This should be updated to include a complete ban on new crossovers in conservation areas so as to be consistent with transport policy. Permeable paving should be a requirement.
- Jones Lang La Salle obo Landsec commented that the policy should be amended to relate to habitable rooms.
- Comments from The blue green economy and Sutherland Grove Residents association on hard standings support for the policy.

#### *Council Response*

- Policy to be amended to reflect habitable rooms approach.
- Whilst the importance of protecting the character of conservation areas is not disputed, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics. The current wording is considered appropriate.
- In accordance with the London, boroughs should determine the remaining 40 per cent of affordable housing tenure split target as low-cost rented homes or intermediate products based on identified need. The identified split should be

embedded in the Local Plan rather than considered on a case-by-case basis. Paragraph 17.27 has been revised to align with the approach set out in the London Plan.

- Policy LP10 requires developments to incorporate Sustainable Drainage Systems (SuDS) or demonstration of alternative sustainable approaches to the management of surface water.

### **LP6 Basements and Subterranean developments**

- The Putney Society responded that digging down an extra 1.2m adds to disruption, makes natural daylighting difficult (required by LP6. A.2) and doesn't actually lead to permeable drainage because the water still has to run to the outside of the basement box.
- Chris Brodie responded stating policies should resist development that loses soft landscaping at the front of the house.
- The Battersea Society supports the policy where it requires not causing harm to amenity during construction.
- Thames Water commented the policy needs additional criterion to mitigate from sewer flooding.

### *Council Response*

- It is considered that the provision of a minimum of 1 metre of naturally draining permeable soil and 200mm of drainage layer is sufficient to allow for both a reduction in the amount as well as speed of surface water runoff.
- A policy that would prevent any basement developments within existing residential areas would not be supported by the Secretary of State and would be considered unreasonable. The London Plan recognises that smaller-scale basement excavations, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space without the costs of moving house. Policy LP5 therefore seeks to restrict the development of large-scale basement excavations, while seeking to ensure that smaller-scale basement excavations have acceptable impact on biodiversity, flood risk and local character.
- Development proposals for basements will also be assessed against policy LP2 which requires that development proposals do not adversely impact the amenity of existing and future occupiers or that of neighbouring properties.
- Expand the supporting text and policy to add extra criterion to policy to include a positive pumped device (or equivalent) to mitigate against the risk of sewer flooding.

### **LP7 Small sites development**

- The Putney Society responded that the policy duplicates LP2. That the current presumption against back garden development is applied to all gardens and this contradicts 14.59.

- Query whether the small site SPD can be provided to allow evaluation of the policy on Putney.
- Historic Environment and Sutherland Grove Residents Association in support of policy. Historic England suggested that the wording of the policy around back garden development should be strengthened.

*Council response*

- The restrictive approach to back garden development reflects the direct and indirect value of gardens contributing to local character, providing safe and secure amenity and play space, supporting biodiversity, helping to reduce flood risk and mitigating the effects of climate change including the heat island effect.
- The Council will consult on the SPD at a later date
- Changes were made to policy LP7 to ensure that redevelopment of existing dwellings to create additional dwellings on small sites is not achieved at the expense of family-sized dwellings with direct access to a dedicated rear garden. The policy supports the redevelopment of dwellings with floorspace in excess of 130sqm as long as the proposal does not result in the net loss of family sized dwellings with direct access to a dedicated rear garden.

**LP8 Shopfronts**

- Generally supported by The Putney Society, Lavender Hill For Me, Sutherland Grove Conservation Area Residents Association.
- The Putney Society and Mr Mark Poulter responded that LP8.A.6 needs stronger wording than avoid.
- Lavender Hill for Me commented that new shops should be designed to adapt to alternative uses.
- The Putney Society commented that shutters seem to be proliferating and the council is doing nothing to stop this. LP8.D There is no justification for this. All glazed fronts are inappropriate for residential outside designated parades, are usually concealed by internal blinds giving the game away, make heat loss difficult to control and risk overheating. Reducing energy use should be the priority.

*Council Response*

- Noted.
- LP8. A.6 wording is considered appropriate.
- Comment noted.
- The shopfront fenestration should be retained, to avoid negative impacts on the street scene. Where development proposals create addition units, development proposals will also be required to comply with policy LP10.

## **LP9 Advertisements**

- The Putney Society commented that preference to be given to local businesses etc for advertising.
- British Sign and Graphics Association commented that internally illuminated signs within conservation areas or on listed buildings can be acceptable in some circumstances.
- Several comments on the policy requiring tightening up of the wording from The Putney society, Living Streets in particular to add wording within or facing CAs LP9. A.5 to be clear that digital billboards are not wanted.

### *Council response*

- Not a local plan issue.
- Policy amended to remove general presumption against internally illuminated signs within CA areas or on listed buildings.
- The wording of Part A.5 of the policy is considered appropriate. Additional detail can be provided in a Supplementary Planning Document.

## **Chapter 15: Tackling Climate Change**

### **LP10 Tackling Climate Change**

- General comments received from residents and amenity groups on tackling Air Pollution as a priority.
- Respondents including Friends of the Earth, The Putney Society, Labour Group and Dr Rosena Allin-Khan MP are supportive of Policy LP 10 but consider more is needed and it is not a bold enough policy.
- Labour group and Councillor Paul White - Carbon Offsetting rates should be increased.
- Various amenity groups and residents commented that all new buildings should be zero carbon now, 35% does not go far enough, carbon offsetting shouldn't be used as an alternative. Developments should be fully not more sustainable. Developers should be required not encouraged to adopt higher standards.

### *Council Response*

- No changes -the Plan now has a separate policy on Air Pollution (LP 14) with development criteria focussed on appropriate design and mitigation.
- Wording added to policy to include a reference to the requirement for whole Life-Cycle Carbon Assessments for all major applications
- No changes proposed to offset rate what has been tested for viability as part of the London Plan, and which most London Boroughs have now adopted. The rate will be reviewed and revised in the future.
- No change. The Draft Local Plan already sets out an ambitious policy to target Climate change, which is achievable.

## **LP11 Decentralised Energy**

Green Party and Turley obo VSM Estates commented;

- Decentralised Energy Networks should stop using gas fired heating systems.
- Turleys responded policy LP11 should also make consideration for alternative energy strategies/technologies that do not connect to an existing decentralised energy network, particularly if it can be demonstrated that it would be more efficient, clean and decarbonised than the decentralised energy network. Energy infrastructure technologies are rapidly evolving and the DHNs that have been installed in the last five years are already dated

### *Council Response*

- Change to LP11 to reflect updated position and align with the London Plan. Remove reference to CHP.
- Further wording added to the policy to reflect the direction of the New London Plan to reference the London Plan Policy SI3 hierarchy.

## **LP12 Water and Flooding**

- General supportive comments from Environment Agency.
- Amend fluvial finished floor level requirements within the policy.
- Amend tidal defended finished floor level requirements within the policy to ensure requirements for passing the Exception Test is made clear even when sites have already passed the Sequential Test.

### *Council Response*

- Supportive comments noted
- Agreed – wording modified to address comments.
- Agreed – wording modified to address comments.

## **LP13 Waste Management**

- Comments from GLA, Political Groups, developers and Amenity Groups.
- GLA generally supportive but commented that the policy in areas is not clear.
- Cory Riverside Energy support the policy but recommend that the policy is amended to contemplate the potential consolidation of existing waste sites.
- Battersea Society support the policy but commented that Wandsworth has a poor record of recycling and needs to take meaningful action.
- Caroline Hartnell responded that composting would make best use of food waste and avoid high levels of carbon emissions.
- The Environment Agency requested confirmation that certain sites have been overlooked or not regarded as safeguarded.

- Friends of the Earth support the policy and commented that Para J should be that developers are required not expected to comply with the paragraph.
- Port of London Authority support the safeguarding of Cringle Dock and Smugglers Way.
- The Putney Society support the policy and requested that the Council comment on the issue of food waste, currently not collected separately but going with general Local Authority Collected Waste to incineration? They also responded that the council should find ways to attract specialist retail businesses which adopt the reuse principle.
- Tooting Liberal Democrats commented that there should be free collection of larger items and hazardous waste.
- Wandsworth Green Party are concerned that there are no further provisions to encourage domestic waste.

#### *Council Response*

- To ensure clarity about the relationship between net self-sufficiency, apportionment targets and need, additional wording has been added to Policy LP 13.
- Further wording added to policy to allow for consolidation of waste sites
- Policy amended to improve explanation and sign-posting to what the Council is doing to reduce waste and increase recycling.
- The list of safeguarded sites was compiled from Environment Agency data.
- Not possible to condition how we monitor where waste is managed from all developments.
- Support welcome.
- Wandsworth's RRP includes an action to encourage business / organisations to adopt a low waste approach for food and packaging. This includes shoppers bringing their own containers to refill from bulk containers.
- As part of its role as a waste collection authority, Wandsworth has prepared a Reduction and Recycling Plan (RRP) which sets out key actions for cutting waste and boosting recycling for the period 2018-2022.

#### **LP14 Air Quality, Pollution and Managing Impacts of Development**

- South East Rivers Trust wanted to see more reference to the natural environment and effect of artificial light.
- Liberal Democrats wanted reference to the impact of wood burning stoves.
- Jones Lang La Salle welcomes the policy but would like text added that due to nature of the market night time noise occurs and residential developments in the vicinity should take measures to protect against any disturbance.

#### *Council Response*

- Wording added to policy to include the effect of light on the natural environment.
- The Air Quality Action Plan covers aspects regarding wood burning stoves.
- London Plan Agent of change policy is sufficient.

## **Chapter 16: Providing for Wandsworth's People**

### **LP15 Health and Wellbeing**

- Planware on behalf of McDonalds objected to the policy and requested that the policy remove the 400m buffer of fast food takeaways. They stated that this has been rejected at other examinations and the policy has no backing.
- Labour group ,TFL and Sport England commented that active design, active travel, good quality affordable housing and sustainable design are also factors to improve health and wellbeing.

#### *Council Response*

- Reference has been removed to the over concentration of takeaways and additional wording added to refer to the adopted London Plan policy E9 which sets a 400m buffer from schools to takeaways.
- Wording added to policy regarding active design, active travel, affordable housing and sustainable design to reflect comments.

### **LP16 Public Houses and Bars**

- The GLA and Historic England support the policy

#### *Council response*

- Supportive comments noted.

### **LP17 Social and Community Infrastructure**

- NHS property services, NHS HUDU responded that LP17 wording may prejudice delivery of NHS services and not in accordance with London Plan. NHS services should be considered cross boundary when looking at relocation or consolidation.

#### *Council Response*

- Wording within Policy changed to reflect position regarding loss of NHS or public service asset.
- The intention of the policy is to reflect the London Plan Policy S2 regarding relocation and consolidation may be beyond the boundary. Wording will be added to the policy to reflect this.

### **LP18 Arts and Culture**

- The Theatres Trust and Putney Society is supportive of the policy.

- The Battersea Society responded that Royal College of Art should be referenced. They also commented that there should be stronger linkages with BDTQ and the Arts and Culture sector.
- Lavender Hill for Me commented that Battersea Business Centre, and adjacent retail frontage should also be included in background text as falling within scope of potential sites that could accommodate new cultural space uses.

#### *Council Response*

- Supportive comments noted.
- Wording added to Riverside Area strategy referencing Royal College of Art as a world leader.
- Wording added to LP18 background text to refer to Battersea Business Centre as a site that has potential to accommodate new cultural space.

#### **LP19 Play Space**

- General support from Putney Society and public - comments on existing play areas must be preserved, also importance of natural planting in play areas.

#### *Council Response*

- Comments noted

#### **LP20 New Open Space**

- Support from the Battersea society, and Historic Parks and Gardens Trust.
- Objection from Quod on behalf of Legal & General Property Partners (Industrial Fund) and Turley's on behalf of VSM Estates wishing for wording to be removed to the blanket requirement for development to pay a financial contribution.
- The Putney Society wish to see a policy that protects existing space
- LP20 There should be a provision for major developments to have a green/natural open space of a minimum size and accessible to all.

#### *Council Response*

- Supportive comments noted.
- LP22 Planning Obligations sets out that all planning obligations must meet the three tests reference in CIL Regulations.
- Paragraph 16.42 provides more detail as to how to calculate for play space.
- The Planning Obligations SPD sets out how the quantum of new open space is calculated.

#### **LP21 Allotments and Food Growing Spaces**

- Supportive comments from Battersea Society.

- Wandsworth Liberal Democrats commented that new allotment space competes with play areas.
- There should be no get out clause all roofs on major development should provide space.

*Council Response*

- Both uses - allotment and play areas will be required by new major developments.
- Comments noted LP59 sets out more information on urban greening.

**LP23 Utilities and Digital Connectivity**

- Supportive comments from the Battersea Society but also comment that street clutter should be minimised.
- PLA support the policy.
- Thames Water request that there is adequate water and wastewater infrastructure to serve all new developments and further wording added to the policy.

*Council Response*

- Supportive comments noted
- Suggested inclusion by Thames Water has been added to supporting text

**Chapter 17: Providing Housing**

**LP24 Providing Housing**

- The Mayor of London highlighted that that Local Plan should not roll forward the housing requirement prescribed by the London Plan (1,950 homes per annum) beyond 2029. If Wandsworth requires a target beyond 2029, it should be considered and developed in collaboration with the GLA.
- Some agents urged the Council to review its minimum housing requirement in light of the publication of the revised standard method on 16 December 2020.

*Council Response*

- It is considered that there is little value in developing a housing target beyond 2028/2029. The now Published London Plan will need to be reviewed by 2028/2029, and thus the future London Plan will set out an updated housing target for the borough. There is therefore a risk that a housing target beyond 2029 defined at this stage would likely be superseded by future updates to the London Plan.

## **LP25 Protecting the Existing Housing Stock**

- The Mayor of London and some agents stressed that the amount of affordable housing should be measured in habitable rooms rather than units.
- The Mayor of London and some agents emphasised that viability assessments should only be required as part of planning applications where the proposed amount of affordable housing falls below the thresholds set out in the London Plan.
- A number of Members and amenity groups criticised maintaining the 15% affordable housing requirement for the VNEB.
- Some amenity groups stressed that the Council should prioritise the provision of low-cost rented housing over intermediate housing.
- Some amenity groups and private individuals expressed concerns that the adopted affordable housing policy expressed concerns that the adopted policy on affordable housing is rarely enforced in planning decisions.

### *Council Response*

The policy has been amended in a number of areas:

- The Regulation 18 version of the Local Plan sets out the intention to continue to calculate affordable housing in terms of numbers of dwellings and not habitable rooms. GLA stressed that such approach would not be consistent with the London Plan, and that it creates a significant disincentive for the delivery of family sized affordable homes. Officers analysed data on past completions to quantify the potential impact of measuring affordable housing in numbers of habitable rooms. The policy has been revised to align with the London Plan.
- Officers amended policy LP25 to limit the requirement for viability evidence to those circumstances which are specified in the London Plan, and to measure affordable housing in habitable rooms. These amendments mitigate the risk of non-conformity with the London Plan.
- The policy has been changed and the affordable housing tenure mix of 50% low-cost rent products and 50% intermediate products to 50% low-cost rent products, 25% First Homes and 25% intermediate products (other than First Homes). The policy will support the delivery of First Homes are discounted by 40% against the market value as long as the applicant can demonstrate that the overall intermediate affordable housing offer would be affordable to households on a wide range of incomes and would contribute to meeting the housing need for properties of different size. The policy provides a degree of flexibility where the above requirements cannot be met on certain sites.

## **LP26 Housing Mix**

- Jones Lang La Salle on behalf of Landsec wish for housing mix not to be prescriptive and determined on a site by site basis.
- Supportive comments from Rolfe Judd on behalf of Ballymore Group.
- Quod on behalf of Kin Development concerned that policy is inflexible and conflicts. Further clarity needed within Part D.

### *Council Response*

- LP26 does not set prescriptive targets but outlines indicative proportions.
- Supportive comments noted.
- More clarity added regarding distinction on terminology.

### **LP27 Protecting the Existing Housing Stock**

- The Putney Society wish to clarify whether it applies to upper levels above shops.

#### *Council Response*

- The Policy does apply to upper levels above shops.

### **LP28 Conversions**

- The Mayor of London and some agents pointed out that limiting conversions to those dwellings that are larger than 150sqm could be considered to be excessive in light of the fact that the minimum space standard for a six bedroom, eight-person dwelling is 138sqm.
- Supportive comments from the Battersea Society and The Putney Society.
- City Planning object to the policy and wish to see greater flexibility.

#### *Council Response*

- The Policy has now been amended.
- Comments noted.

### **LP29 Housing Standards**

- Rolfe Judd on behalf of Ballymore Group commented that they have concerns regarding the prescriptive nature of the requirements of single aspect units and Quod on behalf of Kin Development object to the policy and concerned the requirements exceed the London Plan requirements
- Tooting Liberal Democrats stated that the replacement of front gardens with paving should be denied.
- Cllr Paul White responded that Developments should avoid over-massing and current vegetation and species retained, unless unavoidable in regard to a high social value build.
- The Putney Society commented that balconies should be provided wherever possible in the absence of a garden. There is no real privacy to protect in urban gardens which are almost always overlooked by windows.

#### *Council Response*

- Dual aspect is an important requirement to ensure appropriate residential amenity. Where examples of single aspect residential developments exist, the residential amenity they provide is of poorer quality than dual aspect units. There is sufficient flexibility within the policy and supporting text to allow for

other material considerations to be taken into account. It is however agreed that a single aspect home facing a main road may not have unacceptable exposure to air pollution and noise. Amend policy LP29 by removing a reference to 'main roads'.

- Permitted Development rights allow householders to pave their front garden with hardstanding without planning permission in most cases. Proposals for paving to front gardens will be required to conform to the London Plan when planning permission is required.
- Policy LP1 requires development proposals to integrate existing, and incorporate new, natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience. Proposals should be designed and constructed to achieve high sustainability standards, including by seeking to maximise opportunities for urban greening, having regard to Policy LP 59 (Urban Greening Factor).
- Private amenity space will need to comply with the requirements set out in the London Plan. It states that private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation.

### **Policy LP30 Purpose Built Student Accommodation**

- Some agents pointed out that the policy should support Purpose-Built Student Accommodation which contributes to meeting the strategic rather than only local need for student accommodation.
- Montagu Evans on behalf of Watkin Jones Group commented that further clarity needed on 'good sized rooms'.

#### *Council Response*

- Amend policy LP30 and the associated supporting text to clarify that proposals for new student accommodation must be supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth.
- Replace the requirement to provide 'good-sized rooms' with 'appropriate space standards and facilities'.

### **Policy LP31 Housing with Shared Facilities**

- Various planning agents and developers stressed that the policy is ambiguous and seeks to unnecessarily resist co-living to sites which are 'not suitable for development for conventional units'. A number of agents requested that more clarity is provided how this requirement would be applied.
- A number of respondents (mainly developers and agents) criticised the original approach as being too restrictive.
- Issues were raised that it is not clear how it can be demonstrated that a site is 'not suitable for development for conventional units' as both conventional units

and co-living units are types of housing, and they are likely to occupy and be suited to similar locations. The Regulation 18 version of the Local Plan set out a very restrictive approach to co-living schemes. It is likely that very few schemes will be able to satisfy this requirement.

### *Council Response*

- The policy has been amended to clarify that Purpose-Built Student Accommodation will be permitted where it supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth, or within a reasonable travelling distance of Wandsworth. This approach is aligned with the London Plan, which stipulates that boroughs should support Purpose-Built Student Accommodation which contributes to meeting either local or strategic need.
- The key constraint in Wandsworth is the availability of land for development and this has been a factor when formulating various Local Plan policies. A more permissive approach to large-scale purpose-built shared living could mean that they occupy sites which could otherwise be developed for conventional housing (or other Local Plan priority uses) which meet an evidenced need. Delivery of affordable housing is a key priority of the Local Plan. Large-scale purpose-built shared living accommodation is non-self-contained accommodation, which would preclude delivery of genuinely affordable housing tenures.
- In response to comments, clarity has now been provided within policy LP31 as to what is meant by sites which are not suitable for conventional housing. Proposals will also be required to demonstrate that shared living development would not result in a harmful overconcentration of HMOs at a neighbourhood level (defined as areas within an 800-metre radius from the site), and that shared living accommodation can effectively contribute to the accommodation needs of its main target group.

### **Policy LP32 Build to Rent**

- Various agents such as DP9 obo Greystar Europe Holdings Ltd, Jones Lang La Salle obo Landsec and Montague Evans obo Watkin Jones Group suggested that Build-to-Rent schemes are best suited to smaller unit sizes, meaning that the indicative housing mix proportions set out in policy LP26 should be applied flexibly.
- The tenure of the affordable housing delivered as part of the development will be required to be London Affordable Rent (50%) and London Living Rent (50%) DTZi do not consider that the tenure requirements for build to rent schemes should be the same for build to rent and for sale schemes recognising the differences in scheme viability and management of the homes.
- Quod obo DTZ Investors commented that The New London Plan sets out the policy expectation for affordable housing to be provided as Discount Market Rent with at least 30% at London Living Rent levels, the policy as drafted by Wandsworth does not contain any reference to Discount Market Rent. The policy as drafted is more onerous for Build to Rent schemes to follow the

Threshold Approach as 50% have to be provided London Living Rent levels vs for sale is 50% shared ownership.

*Council Response*

- Policy LP26 does not set out prescriptive targets for dwellings of different sizes, but instead outlines borough-level indicative proportions. The policy will be applied flexibly to ensure that schemes appropriately respond to the specific circumstances of sites.
- The policy has been revised to prioritise the delivery of affordable housing in a separate core and/or block where such approach is feasible in design terms. This approach will help in increasing the stock of low cost rented housing secured in perpetuity through management by a registered provider in Wandsworth to meet priority housing need. The revised policy is aligned with the preferred approach set out in the London Plan.
- The policy continues to require compliance with the indicative housing size mix proportions set out in Policy LP 26. Further, applicants will be required to demonstrate how family-sized units with three or more bedrooms have been designed with a layout primarily to be suitable for family use.

**Policy LP33 Specialist Housing for Vulnerable People**

- Some agents indicated that the policy is more onerous than the London Plan by requiring affordable housing from all forms of supported and specialist housing.
- The Putney Society commented that there is a growing number of over 65's which suggests a need for over 55 Sheltered Housing too. Rooms sizes need to be bigger to encourage downsizing.
- Nightingale Hammerson responded that the policy is currently unsound as it does not provide sufficient flexibility for development on their site to reasonably come forward.

*Council Response*

- It is recommended that the policy should continue to require affordable housing from all forms of specialist and supported housing. Although, the Wandsworth's Local Plan policy goes further than the London Plan, the Greater London Authority have not raised any objections to this provision of policy LP33 in their representations on the Local Plan. Furthermore, the London Plan does not prevent local authorities from introducing additional requirements for the provision of affordable housing.
- The need for downsizing was considered as part of the Local Housing Needs Assessment. It is embedded in policy LP26.
- It is considered that a more flexible wording could undermine the intent of the policy, which seeks to resist the loss of various forms of specialist accommodation so that the level of provision in the borough is not reduced.

### **LP34 Gypsy and Traveller Accommodation**

- Cllr White commented that larger pitches for growing traveller families as well as temporary sites should be arranged.
- Labour Group responded that the existing site suffers from noise and dust pollution from an adjacent industrial site. The Council should approach the traveller community to discuss, in depth, what is needed to render the site fit for the 21st century.
- The GLA noted that as referenced in PLP paragraph 4.14.2 the Mayor will be initiating and leading a London-wide Gypsy and Traveller accommodation needs assessment and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation.

#### *Council Response*

- The Gypsy and Traveller Accommodation Needs Assessment (2019) indicates there is no requirement or need for additional pitches to be provided on the Trewint Street site or elsewhere in the borough.
- Comment noted.

### **LP35 Visitor Accommodation**

- Lambeth Council have commented their concern that visitor accommodation may be permitted outside of the CAZ and town centres.
- Rolfe Judd obo AJDK responded that the policy currently requires marketing evidence where there is no longer demand.
- The Battersea Society responded about the negative impact Airbnb can have on the area and how the Local Plan should tackle this.
- The Putney Society queried table 17.3 where the figures comes from and to note that COVID may impact on housing demand.

#### *Council Response*

- The Policy has been revised to align with the London Plan regarding visitor accommodation in the CAZ.
- Amended policy LP35 to clarify that it is not necessary to submit marketing evidence in order to demonstrate that there is no longer a demand for the visitor accommodation.
- The Putney's housing capacity was informed by the Housing and Economic Land Availability Assessment. The long-term effects of the COVID-19 pandemic on housing market remain unknown. The borough's housing capacity was informed by the Housing and Economic Land Availability Assessment.

## Chapter 18: Building a Strong Economy

### LP 36 Promoting and Protecting offices:

- Broad support for the location of new offices within the borough's town centres local centres, and the potential CAZ retail clusters of Battersea Power Station and Vauxhall, where such development is of an appropriate scale.
- The GLA requested that greater reference is made to the Town Centre Network guidelines for office, as set out within the London Plan, and raised concerns that the Local Plan does not clearly set out how it will meet the identified need.
- The Putney Society, the Battersea Society, Lavender Hill for Me and Mr Gavin Chandler questioned the possibility and/or expressed support for the implementation of an Article 4 Direction to restrict the change of use from existing offices to residential through permitted development rights.

#### *Council Response*

- The borough's Housing and Economic Land Availability Assessment, published alongside each iteration of the Local Plan, provides further detail on how the Council intend to meet the identified office demand. Reference to the Town Centre Network guidelines within the Local Plan is appropriate, however the Council do not wish to prioritise locations beyond the hierarchy already set out within the Local Plan.
- The agreement to proceed with making the Article 4 Direction (Class E to C3) was given by the Council's Executive in June 2021.

### LP 37 Managing Land for Industry and Distribution

- The policy approach supporting the intensification of industrial uses was widely supported, including by Legal & General Property Partners, Marston Properties, and Workspace Group PLC.
- Concerns were also raised by a number of respondents – including the Battersea Society, Workspace Group PLC and the Ballymore Group – that the Local Plan goes further than the London Plan with respect to the protection of industrial use, given the removal of the 'no net loss' principle in accordance with the Secretary of State's Directions to the Mayor of London.
- AFC Wimbledon expressed concerns that the designation of the Summerstown LSIA as a SIL could hinder inward investment and limit contemporary business and job growth, especially following the COVID-19 pandemic.
- A number of landowners of properties within Locally Significant Industrial Areas (SLIAs), such as Marston Properties, Callington Estates Trust, Style and Space Contractors Ltd, Ipsus Developments Ltd, and CBRE, as well as Cllr Henderson (Labour Group) requested that co-location including office floorspace (and in certain cases other uses, such as housing) is provided within the Locally Significant Industrial Areas, such as Lydden Road and Thornsett Road. This is posited as a response to the lack of viability of redevelopment in industrial only use, as well as with reference to a recent appeal decision in Thornsett Road.

- Protean Developments and the Callington Trust Estates made representations for the exclusion of sites they represented from the Locally Significant Industrial Area boundaries.
- The GLA identified support for the evidenced-based approach to the industrial land policy, as well as to establishing identified demand. They requested, however, that a framework for how this need will be met is more clearly set out. Similar comments were made by the Wandsworth Liberal Democrats regarding the forecast deficit.
- The GLA objected to the policy approach supporting co-location within the Battersea Design and Technology Quarter (BDTQ), as this is not compliant with the London Plan, which only permits industrial uses in such locations.
- Schroders Real Estate Management, Workspace Group PLC and Lavender Hill for Me expressed support for the strategic and policy approach within the Battersea Design and Technology Quarter, which permits mixed-use industrial and office uses given the increasingly well-connected nature of the area. The Battersea Society identified potential linkages between the BDTQ and the RCA Quarter/Ransomes Dock.
- The Covent Garden Market Authority outlined support for the policy approach to the protection of the New Covent Garden Market primarily as a wholesale retail facility, including the principle of consolidation and reconfiguration. They requested the policy refer to the potential to establish a food hub in this location. Clarification was sought by Turley OBO VSM Estates that this protection should relate only to the railway arches immediately adjacent to the wholesale market and not those other arches near to the wider NCGM surplus land sites.

### *Council Response*

- The Secretary of State's Directions required that, where possible all boroughs should seek to deliver intensified industrial capacity in either existing and/or new locations where supported by appropriate evidence. Wandsworth's policy seeks to meet an identified need, and the policy approach to existing industrial areas is therefore considerable appropriate and justified.
- The designation of Summerstown as a SIL is evidence-based, and would support (rather than preclude) the types of businesses identified within AFC Wimbledon's representation, including trade counters, arts studios, catering, film and creative studios, protecting land within the borough for these types of uses, which can often be put under pressures to redevelop into higher value uses (such as residential).
- A continuation of the same policy approach for LSIA's, which only permits industrial uses within these locations, is proposed in the draft Local Plan, including for sites where representations suggested removal from an industrial designation. This approach is justified by the evidence base which sets out that there is a substantial need for industrial uses, including to accommodate waste uses. The context of the LSIA's of the Wandle Valley, which are generally not sequentially preferable locations for office development, is considered different and does not justify the same approach of the BDTQ (where mixed-use

development on industrial land is supported), which builds on the investment and development opportunities of the wider Opportunity Area.

- The BDTQ concept is also retained within the 'Publication' version of the Local Plan ('Regulation 19'). The Council consider there are specific locational factors which make a deviation from the London-wide SIL policy appropriate for this area, including existing strengths in the creative industries and investment through incoming businesses and physical infrastructure (such as the Northern Line Extension). The approach builds on the previous policy designation as an Industrial Business Park, and proactive and supportive engagement with landowners in the area on this basis. Finally, the strategy is put forward as a means to help realise intensified industrial floorspace, which both meets an identified need and, in the Council's opinion, can serve to reinforce the Strategic Industrial Land (SIL) designation.
- The borough's Housing and Economic Land Availability Assessment, published alongside each iteration of the Local Plan, provides further detail on how the Council intend to meet the identified industrial demand.
- The Council agree that the policy for New Covent Garden Market should state for clarity that protection for the primary use as a wholesale facility refers to the arches 'immediately' adjacent to the functioning market. It is appropriate to refer to the potential food and horticultural quarter.

### **LP38 Mixed Use Development on Economic Land**

- Lockguard Ltd made representations regarding the inflexibility of the full re-provision of economic uses within Focal Points of Activity, and that this could potentially contradict the ambition for residential-led development in such locations. They suggested an amendment to the Focal Points of Activity policy approach to potentially permit some loss of economic floorspace in favour of residential development.
- The Battersea Society raised concerns over the designations identified within this policy including with respect to their definition and geography, noting a number of inconsistencies. Lavender Hill for Me were generally supportive of the Economic Use Protection Area policy approach, however suggested some amendments.
- The Putney Society responded that mixed use is also good for small scale sites in town centres.

#### *Council Response*

- The Council have agreed an amendment to the Focal Points of Activity policy approach, which should seek the maximum re-provision and would potentially permit some loss of economic floorspace in favour of residential development.
- Policy LP 38 relates to the Local Plan's economic land designations, where these accommodate industrial or office functions in non-centre locations. No amendments to the boundaries are considered necessary due to location within centres or as edge-of-centre sites.

- Mixed-use development within town centres is promoted in Policy LP 45 Development in Centres.

### **LP39 Railway Arches**

- Kin Development sought clarity on the definition of economic uses with respect to their suitability, requesting that this include food and beverage and leisure uses. Similarly, The Arch Company requested that the policy is amended to refer to appropriate sui generis uses, providing additional flexibility. Clarity is also sought with respect to the policy's implementation on the use of arches for low-cost business space and for biodiversity purposes.
- VSM Estates responded that the draft policy should be amended to state the use of railway arches within town and local centres, the CAZ (excluding the Queenstown Road, Battersea SIL area) and London Plan Opportunity Areas for town centre uses (including business, retail, community, leisure and appropriate sui generis uses) and distribution uses (B8) will be supported.
- The Covent Garden Market Authority support the policy with regards to the reconfiguration and revitalisation of the market.
- Lavender Hill for Me expressed support for the use of arches to improve access.

#### *Council Response*

- Generally agree with representations. The policy wording has been amended to add an additional clause to Part A to identify that, within the Wandle Delta Masterplan SPD area while the use of railway arches for economic functions remains the priority, a broader range of commercial uses will be permitted, and that appropriate sui generis uses is also referenced as suggested.

### **LP40 Requirements for New Economic Development**

- The Putney Society noted these as reasonable proposals.
- Workspace Group PLC support the intention, but consider that the policy is too prescriptive.

#### *Council Response*

- The Council agree that introducing a degree of flexibility is appropriate, where this can be justified and will not negatively impact the longer-term function of the site.

### **LP41 Affordable, Flexible and Managed Workspace**

- Support received from The Putney Society and Lavender Hill for Me.
- The Arch Co and the GLA, while generally supportive, sought clarity on (or made representations about) the definition of affordable workspace. Similarly,

Kin Development and Legal and General Property Partners sought further clarity on the definition of cultural workspace

- Workspace PLC support the option to manage the workspace directly, but requested that it should be clarified that details of how this will be delivered should be agreed within a Managed Workspace Plan.
- Landsec and The Arch Co both expressed support for the policy, however sought greater consideration of viability in its implementation.
- Schroders Real Estate Investment Management proposed that the percentage reduction in rent is differentiated between the VNEB OA and the BDTQ area.
- Safestore responded that the policy is currently ineffective when applied to B8 storage and distribution units. Proposing a prescriptive 10% affordable workspace target is counter-productive to the operation of a self-storage site, which due to the nature of their operations, typically need guaranteed security of their premises in order to operate.
- The Battersea Society requested that the policy should include specific reference to the Borough's policy for new mixed-use work/shared living facilities such as the Collective in Chatfield Street and the proposal put forward for Haydon Way.

#### *Council Response*

- It is agreed that the distinction between the provision of workspace at sub-market rents and a form of managed workspace that particularly assists with affordability (termed 'open' workspace) should be clarified within the policy wording and the supporting text. Definitions for these words should also be added to the Glossary, where, for purposes of clarity, the definition of affordable workspace takes forward that used in the London Plan.
- The policy has been amended at Part C to refer to 'specialist workspace', rather than 'cultural workspace', which provides greater flexibility in how this requirement is met (and refers to the types of workspace identified within the policy). Definitions have been added to the glossary for creative clusters, creative quarters, cultural anchor spaces / tenancies, and those for creative industries and cultural industries amended.
- It is agreed that the policy should be amended to clarify that details relating to the provision of managed workspace should be secured by condition and set out within an Affordable Workspace Management Plan.
- It is agreed that the caveat 'subject to scheme viability' which is already included within the policy wording should apply more generally to the policy requirements.
- No changes are necessary to the approach to the percentage reductions in affordable workspace in the VNEB OA, which is based on the Council's Employment Land and Premises Study.
- A new paragraph has been added to the supporting text to clarify that the Council may choose to disapply the policy requirement set out in Part B (of the Regulation 18 version) for large-floorplate storage and distribution uses falling within Use Class B8, where it can be demonstrated that the sub-division of the floorspace is not practical and/or viable. It will, however,

generally be applied to proposals, including for self-storage facilities, where individual units could be leased at a reduced rent or where storage and distribution uses are provided in conjunction with office facilities.

- It is agreed that text should be added within supporting text of the policy to clarify that economic provision as part of shared living facilities should be accessible to member of the public during normal working hours.

#### **LP42 Employment and Training Opportunities**

- The Putney Society queried whether a cost benefit analysis has been undertaken.

#### *Council Response*

- The requirements are based on the experience of the Economic Development Office and are informed by industry standards, where applicable. The requirements herein will also be subject to a Whole Plan Viability Assessment to ensure that they do not negatively impact on the potential for development to come forward, although it is also noted that S106 Planning Obligation agreements are subject to a negotiated process, where applicable.

#### **LP 43 Protected Wharves**

- TfL welcomes the policy protection given to safeguarded wharves. They recommend that bulk deliveries should be secured through planning conditions or obligations for larger sites, or areas with clusters of sites.
- Supportive comments from the GLA on the safeguarding of wharves within the Borough.
- The Ballymore Group and Cory Riverside Energy expressed concerns that the policy was not aligned with the London Plan (Policy SI 15), with respect to the opportunity to consolidate wharves as part of strategic land use changes in Opportunity Areas.
- The Port of London Authority expressed support in principle for the policy, including requirements that development proposals should retain or increase the operation of safeguarded wharves for waterborne freight transport; that proposals for mixed use development on safeguarded wharf sites must be designed to retain or improve the long term operation of the safeguarded wharf, including the retention of adequate access arrangements and ensuring that the operational capacity of the facility is not reduced; and reference to the Agent of Change principle. This should be clarified within the Area Strategies. It provided further information on an update to the Ministerial Directions, which should be referenced within the policy.

#### *Council Response*

- It is agreed that reference should be made within the policy to the potential for the consolidation of wharves as identified within London Plan Policy SI 15 to ensure consistency between the two Plans.
- It is agreed that the intention to safeguard the wharves should be made clear within the Area Strategies. It is considered that the wording of Part C provides sufficient guidance concerning development proposals on sites adjacent or nearby to the safeguarded wharves, and that extending this area to all sites within the relevant Area Strategies (Nine Elms and Wandsworth) is excessive. The wording of the policy replicates that of the London Plan, Policy SI 15. Reference to the updated Ministerial Safeguarding Directions is made in paragraph 18.95, however this will be clarified.

## **Chapter 19: Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres**

### **LP44 Wandsworth's Centre and Parades**

- The Putney Society, the Battersea Society, Mr Chris Brodie, and the Wandsworth Liberal Democrats identified that the Retail Needs Assessment (2020) is based on data and analysis completed in advance of the Coronavirus pandemic, including requests that this document is updated in order to account for the impact of this.
- Representations from Lavender Hill for Me, Mr Chris Brodie, the Putney Society, the Battersea Society and Wandsworth Living Streets provided comments on the borough's hierarchy and designated frontages. Representations noted that there are certain retail and high street facilities in the borough that are not designated, such as Webb's Road (adjacent to Northcote Road), or proposed updates to the existing boundaries, such as those in the Lavender Hill / Queenstown Road Local Centre, Putney, and Wandsworth Town / Old York Road.

### *Council Response*

- The impact of the Coronavirus pandemic, and the countermeasures introduced to mitigate this, has had a significant impact on the borough's centres and local parades. The longer-term impact of this is not yet clear and is unlikely to be so within the timescales for the production of this Local Plan. The borough has introduced greater flexibility in town centre uses which are intended to support the recovery of its centres, whilst also reacting to longer-term market and legislative change (e.g., the introduction of Class E). The borough will continue to monitor vacancy rates and the distribution of uses within its centres and parades, which will help to provide an understanding of the impact of the pandemic and will update its Retail Needs Assessment in support of future planning policies if necessary.
- The Local Plan has been amended to include new Important Local Parade designations for Old York Road, Battersea Square and Webb's Road, which also aligns with the Council's proposals for a Class E Article 4 Direction which

would remove the Class E to Residential permitted development rights for these areas, as well as the other areas in the borough which a relevant policy designation within the adopted Local Plan. A number of the proposed amendments to the designated frontages in Clapham Junction and Lavender Hill / Queenstown Road have been accepted.

#### **LP45 Development in Centres**

- The Putney Society generally support the approach to Important Local Parades.
- Lavender Hill for Me noted concern at the trend for conversion of retail space to residential, and therefore support the policy approach requiring that where this takes place (particularly at the back of existing street facing units), a viable retail unit must be retained. They further suggested that the requirement for proposals to maintain and promote the continuity of active frontages should apply to all frontages, rather than just to core and secondary frontages.
- Landsec noted their support for the allocation of Southside as core frontage, as well as for the greater flexibility of use permissible in these locations. They noted support for the policy approach to residential development in town centres, and particularly that this will be suitable as part of high-density mixed-use development on allocated sites.
- The Battersea Society noted that there is little evidence of innovative thinking in the Local Plan to support the recovery of town centres, and called into question the efficacy of the policy in light of the introduction of Class E and associated permitted development rights.

#### *Council Response*

- It is agreed that the policy should be amended to clearly state that only town centre uses will be acceptable within designated frontages, and that proposals should maintain active frontages in all designated frontages and parades.
- The Council consider that the draft Local Plan introduces some quite significant changes to its approach to town centre management, permitting a much greater degree of flexibility over the use of retail units in core and secondary frontages. This accords with the Government's broader initiatives through the introduction of a more diverse 'Commercial, business and services uses' Use Class E , which has amalgamated various former distinct town centre uses, and was introduced directly as a response to COVID. It is agreed that the introduction of new PDR does pose risks to the protection important uses in key locations (such as centre and clusters of economic uses), and the Council has taken forward an Article 4 Direction to limit the extent of the PDR.

#### **LP46 Out of Centre Development**

- Kin Development, DTZ Investors and Legal and General Property Partners objected and requested that the policy is amended to state that an impact

assessment is exempt in circumstances where the relevant town centre use is identified within a site allocation that is in an out-of-centre location.

*Council Response*

- This policy has been amended to refer to impact assessments.

**LP47 Local Shops and Services**

- Lockguard Ltd noted strong support for the policy flexibility allowing the provision of essential goods and services as part of new residential or residential-led development in the locations that are not within 400m of a designated centre or Important Local Parade.

*Council Response*

- Support noted. This will only be permitted where the scale of the provision is justified and appropriate to meet a local need, and it would not harm the vitality and viability of any of the borough's centres or Parades.

**LP 48 Evening and Night-Time Economy**

- The Theatres Trust support the policy, and in particular the inclusion of Agent of Change principles.
- The GLA support for the inclusion of reference to the Mayor of London's Night-Time Economy Classification, and request that further detail is included about centres located in Wandsworth.
- The Battersea Society expressed concern regarding the promotion of night-time economy uses that are located outside of the borough's centres – in Focal Points of Activity – which could damage prospects for recovery from the pandemic in the centres. It is suggested that the NTE is underplayed in the Local Plan.

*Council Response*

- The supporting text has been amended to provide further detail on the London Plan Night-Time Economy Classification of each of the borough's centres, where appropriate.
- The Council noted its intention to develop a Night-Time Economy Strategy. The policy has been amended to avoid repetition with LP45 (Development in Centres), and to help clarify that town centre uses (including NTE uses) in Focal Points of Activity would still be required to pass the sequential test.

**LP49 Markets**

- The Battersea Society are concerned that new markets are being supported when existing markets should be sustained and enhanced.
- Covent Garden Market Authority support the policy as it pertains to the site.

*Council Response*

- Policy LP 49 has been amended to stipulate those permissions for new markets or extensions to existing markets will only be granted where it can be demonstrated that they will not negatively impact the operation of other markets.

### **LP50 Meanwhile Uses**

- The Battersea Society are supportive of the principal of the policy but responded that further detail is needed as to the kind of support or encouragement that will be provided by the Council to promote 'pop-ups'.
- Supportive comments were made by VSM Estates, Lavender Hill for Me, and the Ballymore Group.

#### *Council Response*

- It is not the position of the Local Plan to outline particular forms of support, such as financial contributions, that will be available for specific meanwhile uses.

## **Chapter 20: Sustainable Transport**

### **LP51 Sustainable Transport**

- The British Horse Riding Society pointed out that equestrian riders should also be part of active travel and equally vulnerable road users.
- Comments from the public and the Putney Society on aspects of the policy such as how do you make freight use safer.
- Private individuals, key stakeholders, and amenity societies all commented positively on the proposed 'Healthy Streets' policy approach as contained in Policy LP51 Sustainable Transport and requested it to contain wording to enhance for active travel infrastructure in the borough where possible.
- Wandsworth Cycling London Cycling Campaign state that Part a should be a requirement not a proposal.
- The Green Party objected that there is too much reliance on electric vehicles and more reference should be given to other more sustainable modes of transport.
- TFL broadly supports the policy but comment that it should include reference to the objective set out in the borough LIP to achieve a shift from car travel and reference to Vision Zero. The definition of sustainable transport modes should also be more focussed.
- The Battersea Society responded that it is disappointing that there is no mention to the use of urban logistics hubs for last mile deliveries by electric vans and bikes. Part B of the policy was weak in supporting walking as a form of active travel. They are supportive of Point B.9.
- The Labour Party support the Policy and the Liberal Democrats provided general comments regarding ensuring new developments ensure walking and cycling are most convenient methods of access to the site.

- Comments received from the public regarding parklets and how it would be more beneficial to plant trees in the space.
- Tooting Bec and Broadway neighbourhood forum responded that there was no mention of Low Traffic Neighbourhoods within the Policy.

#### *Council Response*

- The glossary has been amended to include that all active travel includes all modes of travel that requires physical exertion.
- Freight movement can be made safer through the design of new roads and developments to ensure greater off-street servicing and fewer hazards for freight drivers.
- Supportive comments noted.
- Para B.9 has been changed to reflect Wandsworth Cycling comment
- Reference to Vision Zero has been included to the revised Local Plan. Additional information about the CIL projects which will improve the sustainable transport network have been added to the supporting text of LP51 Sustainable Transport.
- LP51 has been updated to include a reference to the use of Urban Logistics Hubs.
- Supportive comments noted.
- LP58 Tree Management and Landscaping and LP59 Urban Greening Factor provide detailed information on how the Council will introduce new trees into the borough's streets.
- The remit of Low Traffic Neighbourhoods is not within the plan.

#### **LP 52 Transport and Development**

- The British Horse Society responded that cycle paths should be shared with other user groups unless there is a specific unresolvable reason not to do so.
- The Putney Society commented that the policy restricts redevelopment of the Alton Estate.
- Supportive comments from TFL and also mentioned that the policy should also refer to the importance of connectivity by active travel modes.
- The PLA requested that the policy is further strengthened relating to the maximisation of use of water freight.

#### *Council Response*

- Comment noted.
- LP52 has been amended to allow for development in areas with a PTAL of 4 or lower such as the Alton Estate.
- Supportive comments noted.
- The policy has included language recommended by the PLA to maximise the use of water freight.

### **LP 53 Parking, Servicing, and Car Free Development**

- The Battersea Society Commented that the Council should ensure that residents of affordable housing units are not priced out of parking spaces within a development.
- Comments from Quod obo Kin Development are both supportive in principal but there should be support for onsite parking for family housing and retirement housing
- Wandsworth Liberal Democrats would like to see EV charging points in new development exceed the London plan targets.
- Lambeth Council suggested that Car Free and Low Car development should be defined to avoid confusion. More explicit policy on reducing and managing servicing trips would be welcome, including reference to consolidation and green freight.
- Clapham Junction Action Group object to car free development.

#### *Council Response*

- The Council is committed to reducing the usage of cars in the borough by reducing the overall number of car parking spaces not just on street parking. The Local Plan will continue to follow the guidance of the London Plan which states that disabled persons parking bays should be located as close as possible to the building entrance.
- London Plan Policy H13 Specialist older persons housing (B) (5) explains that specialist older persons housing should deliver pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances. The London Plan defines family-sized units as 3 bed + units and they will be car free if built in areas with a high PTAL.
- The Corporate Business Plan and the Local Implementation Plan provides detail on the Council's plans for EV charging points in existing centres/ streets.
- LP53 Parking, Servicing and Car Free Development has been updated to be in line with the London Plan.
- LP53 Parking, Servicing and Car Free Development has been updated to be in line with the London Plan.

### **LP54 Public Transport and Infrastructure**

- Wandsworth Cycling London Cycling wish to ensure that cycling and walking routes can be safe with both uses.
- Numerous comments were received regarding Pimlico Foot Bridge namely that it will not ease congestion, Road traffic levels (Cars etc) will remain at the same level. Cyclists riding across a foot bridge are liable at some point to run someone over. The proposed landing site in Pimlico Gardens contains listed trees. Building works would inevitably lead to environmental damage and pollution.

#### *Council Response*

- Comment noted. Due to a variety of reason including topography and biodiversity, the riverside walks may require cyclists to dismount at sections to ensure complete safety for all users. The policy therefore includes the flexibility that cycling will be accommodated where possible.
- The Bridge Project is aligned with the stated policy objectives of the Council, GLA and others (including the City of Westminster) to encourage healthier travel and support zero emission targets. Before being constructed the Bridge will have to secure planning permission. Including the preferred site in the Local Plan provides greater certainty on the Bridge landing arrangements on the LB Wandsworth side and ensures that the Bridge fulfils its potential to positively shape the riverside public realm on both sides of the river.

## **Chapter 21: Green and Blue Infrastructure**

### **LP55 Protection and Enhancement of Green and Blue Infrastructure**

- Spencer Cricket club was supportive of the plan but felt it could be more proactive about increasing the quantity and quality of sports facilities
- Tooting Liberal Democrats commented that it would be better to have objectives than aim to be the greenest borough in inner London
- Tooting Bec and Broadway responded with supportive comments on the new biodiversity strategy but there is no reference to any emerging Green Infrastructure Strategy.
- Wandsworth Cycling London Cycling Club responded that a commitment is required to develop a cycle network linking open spaces and another to provide more cycle parking in or close to open spaces or specific facilities in them e.g., children's playground.

#### *Council Response*

- The Playing Pitch Strategy has conducted an extensive search for potential locations and suggested options.
- The WESS has the objective to become the greenest borough in inner London and this sets out an action plan to achieve that.
- Wandsworth Council has chosen to follow the Urban Greening Factor as set out in the London Plan.
- Wandsworth Council is preparing a walking and cycling strategy which will aim to create a more comprehensive network for active travel that connects to open spaces.

### **LP56 Open Space, Sport and Recreation**

- The Putney Society welcome the provision of quiet areas and commented that the requirement for major new developments to provide green features does not include enough measures for improving habitats.

- The Battersea Society Open Spaces Committee welcomed the policy but sought targets. They also comment that as the quality of playing pitches has been in decline for many years, it would be helpful to include strategies and policies to reverse this trend.
- The Local Plan should allow for the provision of new pitches, especially to the east of the borough (i.e., in and around Battersea).
- Stephen Knowles commented that there should be a requirement to maintain or increase the number of sports/pitches/facilities per head of population. Limiting the reduction is not enough.

#### *Council Response*

- LP59 Urban Greening Factor will require new developments to providing greening features which will have benefits to biodiversity.
- LP55 (D) explains new development on or affecting public and private green and blue infrastructure will only be permitted where it does not harm the character, appearance or function of the green or blue infrastructure.
- The Playing Pitch Strategy has identified local demand and need and proposes solutions for where new playing pitches could be located and how existing ones could increase their capacity.
- The Playing Pitch Strategy identifies if areas have a surplus or deficiency of playing pitches in the borough and provides a strategy to ensure the demand is being met.

#### **LP57 Biodiversity**

- The Battersea Society Open Spaces Committee recommend strengthening the wording to the policy.
- Natural England commented that the plan should set out the approach to delivering net gains for biodiversity.

#### *Council Response*

- The existing wording is considered sufficient.
- LP57 Biodiversity sets out the boroughs Biodiversity Net Gain requirements

#### **LP58 Tree Management and Landscaping**

- Mr Richard Fox requested that more accurate information should be given about the loss of trees and queried how developer contributions are decided.
- The Putney Society commented that trees on council owned land also need protection as TPOs are not used in these locations.
- London Historic Parks and Gardens Trust felt that it was an omission any detailed policies which apply to development within and adjacent to designed landscapes to ensure there is no adverse impact on designed views into, as well as from, the landscape.

### *Council Response*

- The Council is preparing a tree strategy which will provide more detail around the planting of trees in the borough. Developers may pay a contribution towards the management and maintenance of trees.
- LP58 Tree Management and Landscaping provides further information on retaining and protecting trees.
- LP3 The Historic Environment part C explains that development proposals should protect, and whenever possible enhance strategic and locally important views.

### **LP59 Urban Greening Factor**

- The Putney Society commented that all development proposals should contribute to the greening of Wandsworth and include permeable surfaces as much as possible.
- Wandsworth Green Party and The Blue Green Economy responded that LP59 A should go further by including urban blue-greening Integrated Water Resource Management with rain water harvesting. Mr Richard Fox and Stephen Knowles objected to Part C as everyone should be made to comply. Wandsworth Friends of the Earth queried whether it is an aspiration the UGF or imperative.
- The GLA are supportive of the Policy and point out that London Plan policy G5 is only interim until urban greening factors tailored to local circumstances are established and this should be made clear in the Local Plan.

### *Council Response*

- LP5 Residential extensions and alterations requires hardstanding in front gardens to be constructed of permeable materials for any extensions and alterations.
- The supporting text of the policy explains that Urban greening factor is in use by Wandsworth. It is only in exceptional circumstances that a development could avoid having to include an urban greening factor.

### **LP60 River Corridors**

- The Marine Management Organisation responded that policy should sufficiently protect landscapes and provide flexibility for appropriate developments to come forward.
- The Environment Agency support the policy and gave general comments but also recommend that setback requirements are emphasised in the proposed policy.
- The South East Rivers Trust welcomes the aims of the policy and recommends that it is further strengthened by the inclusion of a requirement for developments along the Wandle to support the delivery of the Wandle Catchment Plan.

- The Wandsworth Green Party commend the policy.
- Port of London Authority generally support the policy but wish it to be strengthened with reference to the Estuary Edges guidance coordinated by the Thames Estuary Partnership.

*Council Response*

- The Council considers the policy is adequate.
- LP60 has been updated in line with the comments from the Environment Agency.
- Proposals for development on the riverside will be subject to LP12 Water and Flooding that expects applicants to consider river frontages. Which is considered to be in general accordance with the Wandle Catchment Plan.
- Comments noted
- LP60 has been updated to mention Estuary Edges as a consideration for any development along the River Thames.

**LP61 Riverside Uses, including River-dependent, River-related and River Adjacent Uses**

- The Environment Agency responded with support and that the policy should clarify that only river related/water compatible uses will be acceptable in the river channels.
- The Battersea Society open spaces committee requested that there should be a policy requirement to include along the length of the Thames Path Wayfinding signs connecting it with other open spaces.
- The GLA responded that the plan should establish the precise boundary of the TPA.
- The Port of London Authority wish to see specific reference to the vital need to provide appropriate riparian lifesaving equipment alongside riverside areas.
- Wandsworth Friends of the Earth were supportive of the policies.
- The Environment Agency wished to see reference to the riverside strategy.

*Council Response*

- Agreed and LP61 has been updated.
- The suggested signposting and toilet facilities may be a requirement of any new development to support wayfinding but as a borough wide scheme that would not be within the remit of the Local Plan.
- The Wandsworth Policies Map does include the exact boundary for the Thames Policy Area.
- LP61 has been updated.
- Support noted.
- LP60 has been updated with reference to the Riverside strategy.

## **LP62 Moorings and Floating Structures**

- The Putney Society responded that the Local Plan should discourage the proliferation of permanently moored vessels.
- The Blue Green Economy and Wandsworth Friends of the Earth support the policy.
- Port of London Authority requested that the policy is amended to require a development proposed in, on or over the Tidal Thames also requires a River Works Licence with the PLA in addition to the required planning permissions.

### *Council Response*

- The Policy encourages short stay moorings.
- Support noted.
- Paragraph 21.49 has been amended to take account of the Port of London Authority comments.

## **Chapter 22 Implementation, Delivery and Monitoring**

- Labour Group and Dr Rosena Allin- Khan commented that there is no mention of resources to be in place to ensure applications are scrutinised.
- Liberal Democrats and Labour Group and Battersea Society responded that there should be more specific targets to measure the policies of the plan and how they have been implemented.
- The Metropolitan Police commented that Section 106 / CIL contributions to mitigate impact on crime The Met Police would like to have the ability to receive financial contributions during the Wandsworth Local Plan period and are in the process of working up a formula linking to development impacts which should be available soon.

### *Council Response*

- Scrutiny of applications is a Development Management issue, however a new monitoring policy LP61 has been added to the plan to ensure effective scrutiny of the policies is undertaken.
- New policy and background text LP61 Monitoring the Local Plan and LP63 Neighbourhood planning added which will ensure the policies of the plan are monitored and provides a mechanism for the community to have a say in development proposals.
- Comments noted. Policy LP1 sets out that development proposals must minimise opportunities for crime and antisocial behaviour, which might involve through planning obligations where justified. The Council adopted the Planning Obligations SPD in 2020, which includes specification on contributions to fund CCTV infrastructure. The Planning Obligations SPD will be updated to reflect the revised policy position on adoption of the new Local Plan.

## Comments on mapping

- Map 15.2 - The Putney Society queried how realistic it is to connect up Putney High Street with DCN.
- Map 19.1 The Putney Society suggest the Town Centre boundary may need to be reviewed.
- Map 20.1 Lambeth Council suggest it would be useful to show how the existing network integrates with Lambeth Healthy Routes Plan.
- Wandsworth Living Streets have requested a PTAL map.
- Battersea Society Open Spaces Committee responded that:
  - Map 21.1 needs a clear strategy if it is to become a reality.
  - Map 21.2 catchment area is reduced as only a small part of Wandsworth Common is classified as natural/semi natural space.
  - Map 21.3 there is no real mention of SINC.

## *Council Response*

- LP11 Energy Infrastructure sets out that new development will be expected to connect to a decentralised energy network, where they do not exist then the developments should make provision to connect to any future network that may be developed. Therefore, any new developments within Putney High Street should make provision for a connection and when an opportunity arises they can then connect to a DEN.
- TCB to be reviewed.
- Map 20.1 is intended to show all the routes.
- The TFL PTAL website should be referred to as this is a live and interactive map.
- Comment noted.
- Most areas of open space have multiple classifications; however, the Open Space Study has for this map focused on the primary classification which for most of Wandsworth Common is Parks and Gardens.

For more information write to:  
**Planning Policy and Design,  
Environment and Community Services,  
Town Hall,  
Wandsworth High Street,  
London SW18 2PU**

Email: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)  
telephone: (020) 8871 6000  
or visit our website: [www.wandsworth.gov.uk/planning](http://www.wandsworth.gov.uk/planning)

