The Planning Inspectorate

Report to the Council of the London Borough of Wandsworth

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Inspectors appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Wandsworth Local Plan

The Plan was submitted for examination on 29 April 2022

The examination hearings were held between 15 November and 29 November 2022

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Contents

Abbreviations used in this report 3

Non-Technical Summary 4

Introduction 5

Context of the Plan 6

Public Sector Equality Duty 6

Assessment of Duty to Co-operate 7

Assessment of Other Aspects of Legal Compliance 7

Assessment of Soundness 8

Issue 1 – Spatial Development Strategy 8

Issue 2 – Area Strategy and Site Allocation Policies 10

Issue 3 – Development Management Policies 27

Monitoring and Delivery 39

Overall Conclusion and Recommendation 39

Schedule of Main Modifications ..... Appendix

Abbreviations used in this report

AMR	Authority Monitoring Report
BDTQ	Battersea Design Technology Quarter
DtC	Duty to Co-operate
EA	Environment Agency
GLA	Greater London Authority
HEP	Higher Education Provider
LSIA	Locally Significant Industrial Area
MOL	Metropolitan Open Land
MM	Main Modification
NPPF	National Planning Policy Framework
SIL	Strategic Industrial Location
PLA	Port of London Authority
PTAL	Public Transport Accessibility Level
SHLAA	Strategic Housing Land Availability Assessment
SME	Small to Medium Enterprises
SoCG	Statement of Common Ground
TfL	Transport for London
WLP	Wandsworth Local Plan

Non-Technical Summary

This report concludes that the Wandsworth Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. The Council of the London Borough of Wandsworth has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amending Policy LP4 Tall and Mid-rise Buildings to ensure 'general conformity' with the London Plan, along with ensuring that the Area Strategy and Site Allocation Policies are consistent with this approach; and
- Adding, amending or deleting policies and explanatory text to guide development; and
- Adding, amending or deleting site allocations and designations to ensure consistency with the NPPF and general conformity with the London Plan in particular in regard to the Area Strategy for Nine Elms; and
- Update Policy requirements in relation to a number of site allocations to ensure each Policy wording is clear, precise, and effective; and
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of Wandsworth's Local Plan in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021 (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Wandsworth Local Plan (WLP), submitted in April 2022 is the basis for our examination. It is the same document as was published for consultation in January 2022.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [**MMs**] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2** etc, and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs. The MM schedule was subject to public consultation for six weeks. We have taken account of the consultation responses in coming to our conclusions in this report and in this light, we have made some amendments to the detailed wording of the MMs and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary we have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Policies Map - Publication Local Plan (April 2022) as set out in document reference SD-010.

6. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. These further changes to the policies map were published for consultation alongside the MMs (PSD-030 - Policy Map Changes Document).

7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in SD-010 - Policies Map - Publication Local Plan (April 2022) and the further changes published alongside the MMs in document PSD-030 Policy Map Changes.

Context of the Plan

8. The WLP is intended to fully replace the policies and site allocations in the adopted Local Plan that comprises the Wandsworth Core Strategy (2016), Development Management Policies Document (2016), Site Specific Allocations Document (2016) and the Local Plan Employment and Industry Document (2018) within a single Local Plan Document. Once adopted the WLP will set out the spatial development strategy for the Borough, along with strategic policies, detailed area strategies, associated site allocations and development management policies to contribute towards securing Wandsworth's social, environmental, and economic objectives.

9. Wandsworth is one of the largest inner London boroughs, stretching from central London at Nine Elms to the edge of Richmond Park, with one of the longest riparian frontages to the River Thames. The Borough includes a diverse range of communities and many distinct neighbourhoods. The 5 town centres (Balham, Clapham Junction, Putney, Tooting and Wandsworth), the Nine Elms Opportunity Area and 9 local centres provide points of focus and identity to the communities that make up the Borough. A third of the Borough's land area is occupied by residential properties, many within one of the 46 conservation areas. A quarter of the Borough's land area is open space, much of which is in the form of large heaths and commons. The quality of much of the townscape together with the close proximity to central London, the abundance of green space, range of popular schools and good distribution of high streets, has shaped Wandsworth into one of the most sought-after places to live in London, placing significant pressure on housing availability and land for employment.

Public Sector Equality Duty

10. We have had due regard to the aims expressed in S149 of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.

11. We have considered several matters during the examination including health and wellbeing, social and community infrastructure, and provision for specialist housing for vulnerable people (Policies LP15, LP17, LP31), also for those who need accessible housing (Policy LP27) along with ensuring there is adequate provision to meet the accommodation needs of Travellers (Policy LP32). In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. There is also no compelling evidence that the WLP as a whole would bear disproportionately or negatively on them or others in this category.

Assessment of Duty to Co-operate

12. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.

13. The submitted Plan was accompanied by a Duty to Cooperate (DtC) Statement [SD-014] and a number of draft statements of common ground (SoCGs) with neighbouring authorities and relevant DtC bodies as required by paragraph 27 of the NPPF. During the course of the examination the Council updated and secured agreement in relation to the SoCGs (WBC-003 to WBC-005 and WBC-012 to WBC-014) and provided further commentary within the Addendum to the Duty to Co-operate Statement, September 2022 (WBC-002).

14. This evidence demonstrates that the Council has been involved in ongoing and constructive engagement on strategic planning matters during the preparation of the WLP, particularly with the neighbouring London Boroughs of Hammersmith and Fulham, Lambeth, Merton, Richmond, Westminster City Council and the Royal Borough of Kensington and Chelsea and the Royal Borough Kingston Upon Thames. In addition to the neighbouring London Boroughs, the Council has demonstrated meaningful engagement with the following prescribed bodies Greater London Authority, Transport for London, Environment Agency, and Historic England, as well as other bodies such as Thames Water, and the Western Riverside Waste Authority.

15. We are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Other Aspects of Legal Compliance

16. The Plan has been prepared in accordance with the Council's Local Development Scheme 2022-2025 dated February 2022 (SD-021).

17. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement dated February 2019 (SD-032).

18. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the plan and other submission documents under regulation 19. The appraisal was updated to assess the main modifications.

19. The Habitats Regulations Assessment January 2022 (SD-005) sets out why an Appropriate Assessment is not necessary.

20. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.

21. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. This is predominantly covered within Issue 3 of this report which considers the climate change policies (LP10 to LP14).

22. The Plan is in general conformity with the spatial development strategy (The London Plan).

23. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

24. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified 3 main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Is the Plan's Spatial Development Strategy justified, effective and in general conformity with the London Plan?

25. Policy SDS1 Spatial Development Strategy 2023 - 2038 seeks to address the needs of the Borough, by setting out a strategy to deliver new homes, jobs, and the facilities, services and infrastructure needed to ensure that the Council's

Placemaking, Inclusive Growth and People First ambitions are met. It does this by setting out key locations across the Borough that will play a strategic economic role or will provide opportunities for regeneration in the plan period. A significant proportion of all new development is directed to the borough's most sustainable locations which are the 5 town centres (Wandsworth Town, Putney, Tooting, Balham, and Clapham Junction) and the 4 regeneration areas (Roehampton and Alton Estate, Nine Elms, Wandsworth Riverside and Wandle Valley) identified within the Plan. Policy SDS1 sets out how the Council will meet the London Plan's 10-year (2019/20 to 2028/29) housing requirement of 19,500 new homes or 1,950 new homes per year along with setting out how the Borough's employment needs will be met. The policy also identifies the need for small sites to contribute to meeting housing need, which is in general conformity with the London Plan.

26. The plan period extends beyond the 10-year housing requirement set out by the London Plan and the WLP carries forwards the housing requirement of 957 new homes per annum to establish a housing requirement for the 15-year Plan period of 20,313 new homes. Notwithstanding this, the WLP sets out that it is likely that housing completions in the Borough are likely to exceed this requirement within the plan period with completions likely be up to approximately 26,315 new homes. For effectiveness, **MM3** is necessary to clarify the approach to housing distribution in accordance with the spatial strategy, deleting ambiguous text within SDS1 Part A that required a sequential approach to housing delivery rather than locational.

27. To ensure that the policy SDS1 is effective at the point of adoption, **MM4** and **MM253** are necessary to take into account the most up to date Authority Monitoring Report (AMR) position, and to illustrate how the London Plan target (paragraph 2.104) will be met over the London Plan period. Along with setting out the trajectory/pipeline for the Local Plan period against the target defined by the London Plan in Policy H1 and paragraph 4.1.11.

28. This is consistent with the London Plan which advises at Paragraph 4.1.11 that if a housing target is needed beyond the 10-year period, Boroughs should draw on the 2017 Strategic Housing Land Availability Assessment (SHLAA) findings (which covers the period up to 2041) and any local evidence of identified capacity, in consultation with the Greater London Authority (GLA). It should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements and roll forward the housing capacity assumptions applied in the London Plan for small sites. Having regard to the SHLAA 2017 and the evidence provided by the Council, rolling forward the London Plan target to the end of the Plan period is a justified approach.

29. PM1 Area Strategy and Site Allocations Compliance is an overarching policy that seeks to bring effect to the WLP's Spatial Development Strategy by directing development to the locations identified within the area strategies or site

locations. For effectiveness, **MM5** deletes criterion B of the policy as this is an unnecessary repetition of section 38(6) of the Planning and Compulsory Purchase Act 2004. To ensure the Plan is effective **MM6** makes consequential amendments to Map 3.2 to take into account the MM's identified elsewhere in this report relating to site allocations NE2, NE6, NE8, NE9, NE14, WT11 ensuring clarity and consistency.

Conclusion

30. Subject to the MMs identified above the Plan's Spatial Development Strategy is based on robust evidence, justified, and is in 'general conformity' with the London Plan and as such it is likely to be effective in delivering a minimum of 20,313 new homes in the plan period.

Issue 2 – Whether the Area Strategies and Site Allocation Policies of the Wandsworth Local Plan are justified, in 'general conformity' with the London Plan, and are likely to be effective?

31. The Placemaking and Area Strategies chapters of the WLP identify key locations in the Borough where growth should be directed consistent with the spatial strategy. The policies allocate and provide site specific guidance for development sites, including infrastructure, mitigation, and location specific transport infrastructure requirements.

Wandsworth Town (Policies PM2, and WT1 to WT22)

32. Policy PM2 sets out the overarching area strategy for Wandsworth Town which seeks to ensure that new development builds upon the area's strengths and opportunities, along with supporting the viability and vitality of Wandsworth town centre. Policies WT1 to WT22 are site allocation policies that seek to bring effect to the strategy by primarily promoting residential led regeneration in the area which seeks to deliver approximately 3079 homes within the first 10 years of the plan period. For the policy to be effective **MM7** deletes criteria A.1. b, ensuring that there can be no ambiguity or conflict with Policy LP4 regarding the direction a decision maker should take when considering development proposals for tall and mid-rise buildings. For effectiveness **MM8** and **MM9** are necessary to provide clear direction to the decision maker by clarifying which 'proposed' and valued views and vistas should be taken into account of as part of the assessment of any development proposals within the Wandsworth Town spatial area as identified in Map 4.1; also deleting references to the Urban Design Study (2021), with specific regard to the views analysis, along with deleting the reference to 'Proposed New Public Open Space' to ensure consistency with Policy WT9 and ensuring that it is consistent with Policy WT11.

33. WT1 is a site allocation policy that provides detailed guidance to deliver mixed-use redevelopment at Chelsea Cars and KwikFit, Armoury Way, SW18. The policy seeks to secure a mix of residential and employment generating floorspace, with provision for community uses, open space and improved permeability. For effectiveness, **MM10** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

34. WT2 is a site allocation policy that provides detailed guidance relating to mixed-use development at Ram Brewery/Capital Studios/ Former Dexion/Duvall site, Ram Street/Armoury Way, Wandsworth, SW18. The policy seeks to support a mix of residential, replacement economic floorspace, retail, restaurant, cultural and entertainment uses, with provision for a riverside walk. For effectiveness, **MM11** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Gasholder Cluster

35. WT4 is a site allocation policy that provides detailed guidance relating to mixed-use development at the Gasholder site, Armoury Way, SW18. The policy seeks to support the comprehensive and integrated redevelopment of this complex site. It requires landowners and developers to produce a masterplan/concept framework with the aim of securing a mix of residential and economic uses with a linear park and riverside way. The policy also allows for complementary small scale town centre uses of a scale that would not impact on the viability and vitality of Wandsworth town centre. To ensure that the policy is effective in relation to addressing historic contamination and securing biodiversity improvements to the River Wandle **MM12** amends paragraph 4.50 to include further detailed direction to make sure that development proposals do not inadvertently create new routes for contamination to migrate to sensitive receptors. For effectiveness, **MM13** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Frogmore Cluster

36. The Frogmore Cluster policy contains 4 site allocations (WT3, WT5, WT6 and WT7) that promote mixed-use development that seek to contribute to the delivery of the vision and objectives of the Wandsworth Town area strategy. To ensure that it is effective **MM14** amends paragraph 4.62 to provide greater clarity regarding the provision of open space and the use of hard and soft landscaping. For effectiveness **MM15** is necessary to provide clear direction to the decision maker at paragraph 4.65 requiring that the built form of development proposals take account of both the setting of Wentworth House

and the Tideway Tunnel structures along with ensuring that adequate space is provided to facilitate the future maintenance of the tunnel. A similar amendment for effectiveness **MM16** is required to paragraph 4.66 to ensure that any proposed riverside walk does not impact on the access requirements that enable the maintenance of the Tideway Tunnel. Furthermore, **MM17** provides greater clarity in relation to the requirement for the retention and provision of active travel bridges within the cluster. For effectiveness, **MM18** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

37. WT8 is a site allocation policy that provides detailed guidance relating to mixed-use development at Ferrier Street Industrial Estate, Ferrier Street, SW18. The policy seeks to support a mix of residential, and intensified economic uses including office, industrial and workspace for small to medium size enterprises (SME). For effectiveness **MM19** is necessary to provide clear direction to the decision maker at paragraph 4.79 regarding the requirements for pedestrian and cycle crossings and connections within the allocations. For effectiveness, **MM20** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Feathers Wharf/Smugglers Way Cluster

38. The Feathers Wharf/Smugglers Way Cluster policy contains 2 site allocations (WT9 and WT10) that promote mixed-use development that seek to contribute to the delivery of the vision and objectives of the Wandsworth Town area strategy. The policy seeks to secure a mix of residential, industrial and office uses with a riverside walk. The policy also seeks to secure improvements to the Wandle riverbank. To ensure that the policy is effective and responds to the requirements of the Environment Act 2021, **MM21** is necessary to amend paragraph 4.89 directing the decision maker to consider opportunities to plan for waste management at WT9 Feathers Wharf, The Causeway, SW18. For effectiveness, **MM22** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

39. WT11 is a site allocation policy that sets out guidance for development proposals at the Western Riverside Waste Transfer Station, SW18. To ensure the policy is effective **MM23** provides greater clarity at paragraph 4.101 regarding the extent of the safeguarded wharf and ensuring that development proposals do not impact on its long-term use or operation. For effectiveness **MM24** updates the boundary of the safeguarded wharf on illustrative Map 4.8. **MM25**[1] corrects the text of the policy at paragraph 4.105 by replacing

[1] Erratum dated 22 February 2023 corrected typographical error.

'decommissioned' with 'de-designated' ensuring consistency with policy LP40 – Safeguarding Wharves, ensuring the policy is effective. For effectiveness, **MM26** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Swandon Way Cluster

40. The Swandon Way Cluster policy contains 2 site allocations (WT12 and WT13) that promote mixed-use development that seek to contribute to the delivery of the vision and objectives of the Wandsworth Town area strategy. The policy seeks to secure a mix of economic floorspace and residential uses. It also supports the creation of a small public space facilitating an additional entrance to Wandsworth Town Station. For effectiveness, **MM27** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Wandsworth Bridge Cluster

41. The Wandsworth Bridge Cluster policy contains 3 site allocations (WT14, WT15 and WT17) that promote mixed-use development that seek to contribute to the delivery of the vision and objectives of the Wandsworth Town area strategy. The policy seeks to secure a mix of residential, industrial, and office uses. It also supports the creation of a new public square along with support for residential development above the existing bus garage if its transport functions would be retained. For effectiveness, **MM28** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

42. WT16 is a site allocation policy that provides detailed guidance relating to mixed-use development at Wandsworth Bridge roundabout, SW18. The policy seeks to secure a mix of residential, and economic uses. It also supports the creation of elevated active travel routes connecting the site to neighbouring developments. For effectiveness, **MM29** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

43. WT19 is a site allocation policy that provides detailed guidance relating to mixed-use development that retains civic/administrative functions at Wandsworth Town Hall, Wandsworth High Street, SW18. For effectiveness, **MM30** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

44. WT20 is a site allocation policy that provides detailed guidance relating to development proposals at Southside Shopping Centre, Wandsworth High Street, SW18. The policy seeks to support improvements to the shopping centre and improved and additional retail floorspace. The policy also allows for mixed-use development that may include residential, leisure and other complementary town centre uses (including social infrastructure/community facilities). For effectiveness, **MM31** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

45. WT21 is a site allocation policy that provides detailed guidance relating to development proposals at 70-90 Putney Bridge Road and 1-2 Adelaide Road, SW18. The policy supports the reprovision of economic floorspace (industrial uses) with potential for residential uses to be incorporated within any redevelopment scheme. For effectiveness, **MM32** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Nine Elms (Policies PM3, and NE1 to NE14 as modified)

46. Policy PM3 sets out the overarching area strategy for Nine Elms. Policies NE1 to NE14 (as modified) are site allocation policies which relate to the identification and provision of land for mixed use developments of commercial, industrial, residential, office space, studio uses and workshops.

47. For effectiveness, **MM33** modifies the Nine Elms cover page by introducing a new Site Allocation NE14 Battersea Ring Main Site, Cringle Street, which was previously an unidentified site that would complement and support the delivery of the existing cluster of sites. For effectiveness **MM34** modifies paragraph 5.11 to reflect the removal of Site Allocation NE8 Silverthorne Road from the Battersea Design Technology Quarter (BDTQ). It also recognises the creation of a new BDTQ Locally Significant Industrial Area (LSIA), which results in an amended Queenstown Road, Battersea Strategic Industrial Location (SIL) boundary and a new Site Allocation at Battersea Studios which lies within the SIL. These modifications ensure that the text to the Policy is in general conformity with the London Plan Policies E4 and E7. For effectiveness **MM35** modifies paragraph 5.12 to recognise that other locations for a potential Nine Elms Pimlico Pedestrian and Cycle bridge may be appropriate and **MM36** updates Map 5.1 Creative Clusters to include the new boundary for the new Site Allocation NE14 Battersea Ring Main Site, Cringle Street.

48. For effectiveness, **MM37** modifies the wording to Policy PM3 A.4 to provide clear direction to the decision maker by clarifying which valued views and vistas should be taken into account of as part of the assessment of any development proposals within Nine Elms, including Battersea Power Station, Westminster World Heritage Site and valued views and vistas as identified in Spatial Area

Maps 5.2 Nine Elms, 5.3 Kirtling Street Cluster and 5.4 BDTQ also deleting references to the Urban Design Study (2021).

49. **MM38** modifies Policy PM3 B.6.a. to reflect the changes following the removal of Site Allocation NE8 (Silverthorne Road) from the BDTQ cluster of sites, and the creation of a new BDTQ LSIA. A consequential modification results in an amended Queenstown Road, Battersea SIL boundary and the creation of a new Site Allocation at Battersea Studios. A further modification to Policy PM3 B.6.c. which reflects the borough's need for B8 floorspace is also required. The modifications ensure the effectiveness of the Plan and to ensure general conformity with the London Plan.

50. **MM39** modifies Policy PM3 C.5. to ensure that access to the Thames Tideway Tunnel Infrastructure is protected from development proposals around Kirtling Street and Cringle Street. **MM40** modifies Policy PM3 C.6. through the deletion of the word "*preferred*" and its replacement with "*current indicative*" to recognise that other locations for the potential Nine Elms Pimlico Bridge may be appropriate. Both of these modifications provide greater clarity to the Plan and ensure its effective delivery.

51. **MM41** modifies illustrative Map 5.2 Spatial Area Map: Nine Elms to reflect the new Site Allocation at NE14 Battersea Ring Main Site as a result of Thames Tideway's recognition of a previously unidentified suitable site for allocation that would complement the existing cluster. **MM41** also proposes other consequential modifications to illustrative Map 5.2 Spatial Area Map: Nine Elms that update Site Allocation NE2 to identify the correct ownership boundary, and update Site Allocation NE9 to align with the Safeguarded Wharves Directions Map 2021 and now includes the area to the southeast of the existing boundary. The proposed Pimlico to Nine Elms Pedestrian and Cycle Bridge will be prefaced with "*indicative location of...*" to recognise that other locations may be suitable. These modifications are all required in the interest of effectiveness.

52. To support delivery and to ensure general conformity with the London Plan Policies E4 and E7, a new separate Site Allocation at NE8 (Battersea Studios) is created and the boundary to NE6 Havelock Terrace is modified to correctly identify the area of significance to the site allocation. Additionally, to correctly identify the area of significance for the cluster, the BDTQ boundary is modified to include the BDTQ LSIA (Havelock Terrace and Ingate Place) and NE8 Battersea Studios, with the area north of Palmerston Way and south of Ingate Place between it and Battersea Studios removed. The Queenstown Road Battersea SIL boundary is also modified to remove the area including Ingate Place and Havelock Terrace north of the railway line. Consequently, the area of the Queensgate Road Battersea SIL which includes Havelock Terrace and Ingate Place north of the railway line is redesignated to the LSIA to be titled "Battersea Design and Technology Quarter LSIA". The changes set out in **MM41** are required to ensure clarity and effectiveness and that the WLP is in general conformity with the London Plan.

53. To ensure its effectiveness **MM42** modifies illustrative Map 5.3 Spatial Area Map: Kirtling Street Cluster to reflect the updated boundary of NE2 41 - 49 Nine

Elms Lane, and 49 - 59 Battersea Park Road which corrects the site ownership boundary by including the area to the northeast. Site NE9, Kirtling Wharf, is modified to ensure that the Thames Tideway Tunnel Shaft icon is relocated to its correct position in the northeast corner, and the boundary of Site NE9 is revised to include the area to the southeast so that it aligns with the Safeguarded Wharves Directions Map 2021 and now includes the area to the southeast of the existing boundary. The proposed Pimlico to Nine Elms Pedestrian and Cycle bridge will be prefaced with "*indicative location of...*" to recognise that other locations may be suitable. The boundary of Site Allocation at NE14 Battersea Ring Main and key are included south of NE11 and Cringle Street and east of Battersea Power Station, west of Kirtling Street and north of Pump Lane as a result of Thames Tideway's recognition of a previously unidentified suitable site for allocation that would complement the existing cluster of nearby site allocations. The icon for "suggested location for new public open space" at NE9 Kirtling Street is to be removed to clarify that this area will not be expected to bring forward new public open space.

54. To ensure its effectiveness and general conformity with Policies E4 and E7 of the London Plan, **MM43** modifies illustrative Map 5.4 Spatial Area Map: Battersea Design Technology Quarter and the boundary to NE8 Silverthorne Road to reflect the new boundary for NE8 Battersea Studios. A consequential modification also modifies the key so that it reflects the change of NE8 from Silverthorne Road to Battersea Studios. To correctly identify the area of significance to the site allocation the boundary to Site Allocation NE6 Havelock Terrace is modified to remove the area north of Palmerston Way and remove the "suggested building frontages" outside of the new boundaries. The BDTQ boundary is also modified to only include the BDTQ LSIA (Havelock Terrace and Ingate Place), and NE8 Battersea Studios with the removal of the area north of Palmerston Way and the area south of Ingate Place between it and Battersea Studios. The boundary to Queenstown Road Battersea SIL is modified to remove the area including Ingate Place and Havelock Terrace north of the railway line. Queenstown Road Battersea SIL is redesignated to include Havelock Terrace and Ingate Place north of the railway line to the LSIA to be titled "Battersea Design Technology Quarter LSIA".

Kirtling Street Cluster

55. To ensure the comprehensive delivery of the Kirtling Street Cluster **MM44** is a consequential modification that amends the wording to the Site Allocation at NE14 Battersea Ring Main Site, Cringle Street SW8 to reflect the Thames Tideway recognition of a previously unidentified suitable site allocation that would complement the existing cluster of nearby allocations. **MM45** inserts a new paragraph after paragraph 5.26 to reflect the new Site Allocation at NE14 for the same reasons as **MM44**. These modifications ensure clarity for effectiveness.

56. **MM46** modifies paragraph 5.27 for clarity and to ensure its effectiveness in relation to Kirtling Street Cluster ground floor uses and the Design Code. For its effectiveness, **MM47** modifies paragraph 5.29 and inserts a new bullet point taking into account the new Site Allocation at NE14 which will need to take

account of existing Thames Water infrastructure within any mixed-use development. **MM48** also modifies paragraph 5.29 for effectiveness requiring agreement with the Port of London Authority (PLA), the GLA and Thames Water for developments at Kirtling Wharf and Cringle Dock Sites.

57. **MM49** is a consequential modification for effectiveness amending the wording of paragraph 5.30. This clarifies that proposals to the north of the cluster at Kirtling Wharf are not designated as public open space and any public realm landscaping should not conflict with the safeguarded wharf use. To ensure its effectiveness **MM50** modifies paragraph 5.31 with reference to the new site allocation at NE9. For effectiveness **MM51** and **MM52** modify paragraphs 5.37 and 5.39 to clarify that an alternative location for the potential Nine Elms - Pimlico Pedestrian and Cycle Bridge may be appropriate.

58. To ensure that the Policy is effective, **MM53** modifies the wording to paragraph 5.39 to clarify that any proposed gateway/landmark building will be subject to the ongoing maintenance of the Thames Tideway Tunnel's infrastructure. For effectiveness **MM54** modifies paragraph 5.41 to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings and **MM55** modifies illustrative Map 5.5 Kirtling Street Cluster so that the boundary to the cluster includes the new Site Allocation NE9 and aligns with the Safeguarded Wharves Direction from February 2021.

59. To ensure that the Policy is effective, **MM56** modifies Picture 5.5 to reflect the correct ownership of the boundary of NE2, 41 - 49 Nine Elms Lane and 49 - 59 Battersea Park Road. For effectiveness **MM57** and **MM58** modify paragraphs 5.55 and 5.63 respectively to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings. To ensure compliance with Policies E4 and E7 of the London Plan, **MM59** modifies illustrative Map 5.7 Battersea Design and Technology Quarter and renames it Battersea Design and Technology Quarter LSIA. The Boundary to NE6 is modified to remove the area north of Palmerston Way, including amending the BDTQ boundary. Illustrative Map 5.7 is also modified at Ingate Place and Havelock Terrace to ensure that it correctly focuses on the areas of importance.

60. To ensure that the Policy is effective, **MM60**, **MM61** and **MM62** amend paragraphs 5.70, 5.72 and 5.73 respectively to reflect the removal of Site Allocation NE8 (Silverthorne Road) from the BDTQ cluster of sites. **MM63** modifies paragraph 5.75 to ensure that development proposals align with the BDTQ Economic Appraisal Development Framework. This ensures effectiveness and removes any uncertainty. Likewise, **MM64** deletes the third bullet point from paragraph 5.76 and reflects the removal of Site Allocation NE8 from the BDTQ cluster of sites, whilst **MM65** modifies paragraph 5.76 by removing reference to the BDTQ Economic Appraisal Development Framework. For effectiveness **MM66** modifies paragraph 5.77 by removing Site Allocation NE8 from the BDTQ cluster of sites, **MM67** modifies paragraph 5.78 to reflect

the amendments made to the northern boundary of Site Allocation NE6. **MM2** is a consequential amendment to the explanatory text at paragraph 2.96 of the Plan relating to the removal of Site Allocation NE8 from the Battersea Design and Technology Quarter (BDTQ cluster of sites and the creation of a new BDTQ ensuring general conformity with the London Plan.

61. For effectiveness, **MM68** ensures that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings. To ensure general conformity with the London Plan **MM69** deletes the second bullet point from paragraph 5.79 to reflect the removal of site allocation NE8 from the BDTQ cluster of sites, **MM70** inserts a new illustrative map with NE8 Battersea Studios to reflect the boundary of the new allocation and **MM71** creates the new Site Allocation NE8 Battersea Studios.

62. For effectiveness, **MM72** modifies the wording to paragraph 5.81 to ensure that developments at Site Allocation NE10 are designed to facilitate the operation and maintenance of the Thames Tideway Tunnel. **MM73** and **MM74** modify paragraph 5.82 to ensure that site allocation NE10 supports proposals to extend the site westwards to include Heathwall Pumping Station subject to discussions with relevant parties, including securing the agreement of the PLA and GLA. This ensures the policy is both flexible and effective.

63. Consequential modifications **MM75**, **MM76**, **MM77** and **MM78** to paragraphs 5.101, 5.115, 5.129 and 5.136 are necessary for effectiveness to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Clapham Junction and York Road/Winstanley Regeneration Area (Policies PM4, and CJ1 to CJ7)

64. Policy PM4 sets out the overarching area strategy for Clapham Junction and York Road/Winstanley Regeneration Area. To bring effect to this strategy, Policies CJ1 to CJ7 relate to 7 site allocations that primarily promote residential led regeneration that seek to deliver approximately 2,995 homes within the first 10 years of the plan period. So that the strategy for the area is effective, **MM79** provides additional supporting text to the policy to ensure that the operation and maintenance of the Thames Tideway Tunnel Infrastructure would not be compromised by development proposals. For effectiveness **MM80, MM81 and MM82** are necessary to provide clear direction to the decision maker by clarifying which valued views and vistas should be taken into account of as part of the assessment of any development proposals within the Clapham Junction and York Road/Winstanley Regeneration Area spatial area as identified in illustrative Map 6.1 also deleting references to the Urban Design Study (2021) along with correcting typographical errors including accurately referencing 'Clapham Junction Urban Heart Masterplan Boundary'. Likewise, for

effectiveness **MM83** addresses a typographical error in illustrative Map 6.2 to correctly reference 'Clapham Junction Urban Heart Masterplan Boundary'.

65. CJ1 is a site allocation policy that provides detailed guidance to deliver mixed use development proposals at the ASDA, LIDL and Boots sites, Falcon Lane, SW11. The policy seeks to ensure the retention of the sites retail function, whilst encouraging appropriate town centre uses, residential development and new public space, it also seeks to retain the Post Office and delivery office within the allocation. To ensure the policy is effective, **MM84** adds flexibility by adding the word 'future' when referencing the Urban Heart Masterplan, allowing for development proposals to react to the most current guidance. For effectiveness, **MM85** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

66. CJ2 is a site allocation policy that provides detailed guidance to deliver residential and mixed-use development proposals to include appropriate town centre uses at Clapham Junction Station Approach, SW11. The policy also seeks to secure improvements to the station entrance and facilities. To ensure the policy is effective, **MM86** adds flexibility by adding the word 'future' when referencing the Urban Heart Masterplan, allowing for development proposals to react to the most current/latest guidance. For effectiveness, **MM87** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

67. CJ3 is a site allocation policy that provides detailed guidance to deliver mixed use development proposals (commercial, community and residential) at Land on the corner of Grant Road and Falcon Road, SW11. To ensure the policy is effective, **MM88** adds flexibility by adding the word 'future' when referencing the Urban Heart Masterplan, allowing for development proposals to react to the most current/latest guidance. For effectiveness, **MM89** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

68. CJ4 is a site allocation policy that provides detailed guidance to deliver mixed use development proposals at Land at Clapham Junction station, SW11. The policy seeks to ensure that the station is safeguarded (including surface works associated with Crossrail 2), whilst supporting development proposals that comprise of residential, commercial, and appropriate town centre uses. To ensure the policy is effective, **MM90** adds flexibility by adding the word 'future' when referencing the Urban Heart Masterplan, allowing for development proposals to react to the most current/latest guidance. For effectiveness, **MM91** is necessary to ensure that the text of the policy is consistent with Policy LP4

regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

69. CJ5 is a site allocation policy that provides detailed guidance that seeks to deliver mixed tenure housing, a leisure centre, along with cultural, commercial and health uses. The policy also supports the provision of convenience shopping, a library, community facilities and open space at Winstanley/York Road Regeneration Area, SW11. To ensure that the policy is effective, **MM92, MM93** and **MM94** provide further detail and clarification regarding how a decision maker should react to any updated or emerging masterplan for the area, the provision of public transport facilities and the proposals should have regard to relevant management plans. For effectiveness, **MM95** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

70. Policy CJ6 Peabody Estate, St. John's Hill is a site allocation that provides detailed guidance to deliver residential development with ground floor town centre uses fronting St. John's Hill. To ensure that the policy is effective, **MM96** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

71. CJ7 is a site allocation policy that provides detailed guidance to deliver mixed use development including residential and commercial uses at 36 - 46 St Johns Road and 17 Severus Road. For effectiveness, **MM97** addresses a typographical error adding the word 'development' at paragraph 6.82 and **MM98** provides greater clarity in regard to site layout by specifying that St Johns Road is a 'Core' retail frontage and simplifying the policy by deleting overly complex/prescriptive guidance.

Putney (Policies PM5, PUT1 to PUT6)

72. Policy PM5 sets out the overarching area strategy for Putney. To bring effect to this strategy, Policies PUT1 to PUT6 relate to 6 site allocations that identify land for predominantly mixed-use development that includes amongst other things, residential, retail, leisure, office, restaurant, and bar uses with associated infrastructure improvements. To ensure that Policy PM5 is effective **MM99** provides clear direction to the decision maker by adding 'valued views' to criteria A.2 to ensure that they are considered as part of the assessment of any development proposals within the Putney spatial area as identified in illustrative Map 7.1, it also deletes references to the Urban Design Study (2021). For effectiveness, **MM100** amends criteria C.9 by deleting the requirement to relocate the existing taxi rank as this is no longer an objective of the Council.

73. PUT1 is a site allocation policy that provides detailed guidance to deliver mixed use development proposals at the Wereldhave site, 56 - 66 Putney High Street, SW15. For effectiveness, **MM101** provides clarification regarding parking and access to the site by deleting text that is inconsistent with the Council's agreed position with Transport for London (TfL) and **MM102** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

74. PUT2 is a site allocation policy that sets out detailed guidance to support the delivery of mixed-use development proposals that should include townscape improvements and the provision of public open space at Jubilee House and Cinema, Putney High Street, SW15. For effectiveness, **MM103** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

75. PUT3 is a site allocation policy which provides detailed guidance to support the delivery of mixed-use development proposals that contribute to the economic regeneration of the town centre. Amongst other things the policy requires that development proposals replace existing office space whilst providing facilities for SME's and include affordable floorspace at the corner of Putney Bridge Road and Putney High Street, SW15. For effectiveness, **MM104** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

76. PUT5 is a site allocation policy that sets out detailed guidance to support the delivery of mixed-use development proposals that should include active retail and leisure frontages at ground floor level with residential/business use on the upper floors and the provision of public open space at Sainsbury's Supermarket, 2-6 Werter Road, Putney, SW15. For effectiveness, **MM105** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for mid-rise buildings.

77. PUT6 is a site allocation policy that sets out detailed guidance to support the delivery of residential led mixed-use development proposals with retail/commercial and/or creative/cultural uses. Proposals should also seek to provide green, pedestrian and cycle friendly public realm at 55-61 Putney High Street, SW15. For effectiveness, **MM106** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

Tooting (Policies PM6, and TO1 to TO3)

78. Policy PM6 sets out the overarching area strategy for Tooting. Policies TO1 to TO3 are site allocation policies which relate to the identification and provision of land for mixed-use development to include reprovision of the market, Royal Mail delivery office, healthcare facilities, residential and commercial uses. To ensure that Policy PM6 is effective, **MM107** is necessary to provide clear direction to the decision maker by clarifying which valued views and vistas should be considered as part of the assessment of any development proposals within the Tooting spatial area as identified in illustrative Map 8.1.

79. TO1 is a site allocation policy that promotes and provides detailed guidance to support and guide the mixed-use development, which includes the reprovision of the market, and Royal Mail delivery office along with residential, retail, and public open space at Market Area, Tooting High Street, Tooting SW17. For effectiveness, **MM108** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for mid-rise buildings.

80. TO2 is a site allocation policy that promotes and provides detailed guidance to guide development proposals at St Georges Hospital, Blackshaw Road, SW17. For effectiveness, **MM109** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

81. TO3 is a site allocation policy that promotes and provides detailed guidance to guide proposals for residential led mixed-use development at 50 – 56 Tooting High Street, Tooting. For effectiveness, **MM110 and MM111** are necessary to ensure that the text of the policy is in general conformity with the London Plan regarding the approach to decision making in regard to ensuring public realm enhancements for pedestrians and deleting the requirement for servicing to take place directly from the Garratt Lane frontage.

Roehampton and Alton Estate Regeneration Area (Policies PM7, and RO1 to RO3)

82. Policy PM7 sets out the overarching area strategy for Roehampton and Alton Estate Regeneration Area. To bring effect to this strategy, Policies RO1 to RO3 relate to 3 site allocations that primarily promote residential led regeneration that seek to provide approximately 849 homes within the first 10 years of the plan period. To ensure that Policy PM7 is effective **MM112** is necessary to provide clear direction to the decision maker by clarifying which valued views and vistas should be considered as part of the assessment of any development proposals relating to the regeneration area. To ensure the delivery of the strategy for the regeneration area **MM113 and M114** amend the wording of the text to provide greater clarity in regard to the status and weight afforded to the

Alton Estate masterplan or any subsequent masterplan when determining development proposals.

83. RO1 is a site allocation policy that promotes and provides detailed guidance to support and guide the residential led regeneration, which includes new retail, employment and community uses at Alton West Intervention Areas, Roehampton, SW15. For effectiveness, **MM115** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for tall and mid-rise buildings.

84. Policy RO3 is a site allocation policy that provides detailed guidance to support and guide the reprovisioning of existing car parking and the provision of additional medical buildings/facilities at Queen Mary's Hospital car park, SW15. For effectiveness, **MM116** is necessary to ensure that the text of the policy is consistent with Policy LP4 regarding the approach to decision making when determining development proposals for mid-rise buildings.

Balham (Policies PM8 and BA1)

85. Policy PM8 sets out the overarching area strategy for Balham. Policy BA1 is a site allocation that relates to the identification and provision of land for mixed-use development comprising of residential, commercial, cultural, community and open space at Sainsbury's Car Park, Bedford Hill, SW12. To ensure that Policy BA1 is effective, **MM117 and MM118** are necessary to provide clear direction to the decision maker by clarifying which valued views and vistas should be considered as part of the assessment of any development proposals relating to the allocation. For effectiveness, **MM119** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

Wandsworth Riverside (Policies PM9, and RIV1 to RIV11)

86. Policy PM9 sets out the overarching area strategy for Wandsworth Riverside. The strategy seeks to promote residential-led redevelopment to provide new housing, with a mix of small-scale commercial uses in Focal Points of Activity. In support of this the policy seeks to create a coherent network of links that prioritises pedestrian/cycling movement along the river, increasing opportunities for people to enjoy and directly interact with both the Thames and the Wandle. To ensure that the strategy for the area is effective, **MM120** and **MM134** amend the supporting text to the policy at paragraph 11.8 and policy criterion A.9 to ensure that the operation and maintenance of the Thames Tideway Tunnel Infrastructure would not be compromised by development proposals. To ensure effectiveness, **MM121** and **MM133** corrects typographical errors on the illustrative Map 11.1 to ensure consistency with policy RIV3, correctly referencing 11 - 25 Chatfield Road and 41 - 47 Mendip Road, SW11 and

correcting the location of the proposed Diamond Jubilee Bridge and also deletes the reference to Urban Design Study (2021). To bring effect to the area strategy Policies RIV1 to RIV11 are 11 site allocation policies which relate to the identification and provision of land to deliver housing, commercial uses and improved connectivity.

87. RIV1 is a site allocation policy that promotes and provides detailed guidance to support and guide development proposals that include residential use, with active frontages including small-scale retail, restaurants and bars, and new public space leading to the Thames riverside at the Former Prices Candles Factory, 110 York Road, Battersea, SW11. For effectiveness, **MM122** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

88. RIV2 Dovercourt site, York Road, SW11 is a site allocation policy that promotes and provides detailed guidance to support and guide development proposals that include residential use and new public open space, with replacement economic uses. The policy also seeks to secure a new route connecting York Road to Bridges Wharf. For effectiveness, **MM123** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

89. RIV3 is a site allocation policy that promotes and provides detailed guidance to support and guide development proposals with economic uses on the ground floor and residential to upper floors at 11-25 Chatfield Road and 41-47 Mendip Road, SW11. For effectiveness, **MM124** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

90. RIV4 is a site allocation policy that promotes and provides detailed guidance to support and guide development proposals incorporating replacement economic floorspace including affordable creative workspace, and residential with new public space at Gartons Industrial Estate, Gartons Way, SW11. For effectiveness, **MM125** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

91. RIV5 is a site allocation policy that promotes and provides detailed guidance to support and guide development that incorporates replacement economic floorspace and residential use at York Road Business Centre, Yelverton Road, SW11. For effectiveness, **MM126** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

92. RIV6 is a site allocation policy that promotes and provides detailed guidance to support and guide development to include residential and replacement economic floorspace at 36 Lombard Road, SW11. For effectiveness, **MM127** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

93. RIV7 is a site allocation policy that promotes and provides detailed guidance to support and guide development proposals that incorporate replacement economic floorspace and residential use alongside improvements to the amenity and appearance of the adjacent open space at Travis Perkins, 37 Lombard Road, SW11. For effectiveness, **MM128** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

94. RIV8 is a site allocation policy that promotes and provides detailed guidance to support and guide development to include replacement economic floorspace and residential use at 19 Lombard Road, 80 Gwynne Road, SW11. For effectiveness, **MM129** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

95. RIV9 is a site allocation policy that promotes and provides detailed guidance to support and guide residential development proposals at The Chopper P.H., 58-70 York Road, SW11. For effectiveness, **MM130** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

96. RIV10 is a site allocation policy that promotes and provides detailed guidance to support and guide residential development and commercial uses that include opportunities for affordable creative workspace at 200 York Road, Travelodge Hotel, SW11. For effectiveness, **MM131** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

97. RIV11 is a site allocation policy that promotes and provides detailed guidance to support and guide residential development with the provision of play facilities and parking facilities at Battersea Church Road/Crewkerne Court Garage, Somerset Estate, SW11. For effectiveness, **MM132** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

Wandle Valley (Policies PM10 and WV1)

98. Policy PM10 sets out the overarching area strategy for the Wandle Valley. For effectiveness, **MM135** is necessary to provide clear direction to the decision maker by clarifying which valued views and vistas should be taken into account of as part of the assessment of any development proposals within the Wandle Valley spatial area as identified in illustrative Map 12.1 also deleting references to the Urban Design Study (2021). Policy WV1 is a site allocation that relates to the identification and provision of land for mixed-use development comprising of residential and economic uses at Riverside Business Centre and Former Bingo Hall, Bendon Valley, SW18. To ensure that Policy WV1 is effective **MM136** is necessary to specify that the increase of at least 50% industrial and office floorspace within the allocation comprises of a minimum of 25% industrial and a minimum of 25% office floorspace. For effectiveness, **MM137** ensures that the policy is consistent with Policy LP4 regarding the approach to decision making in relation to development proposals for tall and mid-rise buildings.

Outside the Spatial Areas (Policies OUT1 to OUT6)

99. Policies OUT1 to OUT6 are 6 site specific policies which relate to the identification and provision of land for development in the Borough that are located outside the identified Spatial Areas.

100. OUT1 - Balham Health Centre, 120 - 124 Bedford Hill, London, SW12 is a site allocation policy that promotes the mixed-use development of the site to include residential and an expansion of healthcare facilities. To ensure that the policy is effective, **MM138** ensures that the policy is consistent with Policy LP4 by providing clear direction for the decision maker regarding development proposals for tall and mid-rise buildings.

101. OUT2, 259 - 311 Battersea Park Road, SW11 is a site allocation policy that promotes the mixed-use development of the site to include residential and an expansion of healthcare facilities. For effectiveness, **MM139** ensures that the policy is consistent with Policy LP4 by providing clear direction for the decision maker regarding development proposals for tall and mid-rise buildings.

102. OUT3, Springfield Hospital, Burntwood Lane/Glenburnie Road is a site allocation policy that promotes new and improved hospital facilities with small scale retail/commercial serving the hospital, residential and school facilities. For effectiveness, **MM140** ensures that the policy is in general conformity with the London Plan by providing clear direction for the decision maker regarding car parking provision and encouraging the use of active travel and public transport. **MM141** provides additional design guidance to ensure that the size of any proposed urban blocks is consistent with the site-specific character and urban grain of the area ensuring that the policy is effective.

103. OUT4 is a site allocation policy that promotes residential led mixed-use development to include community uses and new public open space at the Randall Close Day Centre and adjacent Surrey Lane Estate Car Park, SW11. For effectiveness, **MM142** ensures that the text of the policy is consistent with Policy LP4 by setting out the approach to decision making regarding development proposals for tall and mid-rise buildings.

104. OUT5, Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London is a site allocation policy that promotes residential development with the re-provision and expansion of healthcare facilities and parking. For effectiveness, **MM143** ensures that the policy is in general conformity with the London Plan by providing clear direction for the decision maker regarding car parking provision and encouraging the use of active travel and public transport.

Conclusion

105. Subject to the MMs identified above the Plan's Area Strategies and Site Allocation Policies are based on robust evidence, are justified, and in 'general conformity' with the London Plan and as such they are likely to be effective in making a significant contribution towards the delivery of a minimum of 20,313 new homes in the plan period.

Issue 3 – Whether the Development Management Policies of the Wandsworth Local Plan are justified, in 'general conformity' with the London Plan, and are likely to be effective?

106. The WLP contains 63 Development Management policies that are arranged over 9 chapters. These deal with achieving design excellence, tackling climate change, providing for Wandsworth's people, providing housing, building a strong economy, ensuring the vitality, vibrancy and uniqueness of the Borough's centres, sustainable transport, green and blue infrastructure and the natural environment, and implementation, delivery and monitoring which seek to provide clear direction for the decision maker in relation to development proposals within the Borough.

Achieving High Quality Places (Policies LP1 to LP9)

107. There are 9 policies within the Achieving Design Excellence chapter of the WLP that seek to provide clear direction in relation to design and development within the Borough. The policies seek to promote a design-led approach to decision making and set out general development principles. The chapter also provides clear guidance on development affecting the historic environment, tall and mid-rise buildings, residential extensions and alterations, basements and subterranean developments, residential development on small sites, shopfronts, and advertisements.

108. **MM144** modifies Policy LP3 (Historic Environment) to ensure greater clarity is provided regarding the setting and integrity of local views, and reference to the Urban Design Study (2021) is deleted and replaced by the Spatial Area Maps. **MM145** adds new text to paragraph 14.23 and is required to ensure that all building operations respond to climate change. This approach is considered justified and ensures that the policy is effective and in accordance with national policy.

109. To ensure it is in general conformity with the London Plan, **MM146** modifies Policy LP4 (Tall and Mid-rise Buildings). Wandsworth is predominantly comprised of low rise, suburban development. However, to enable growth and regeneration, more tall buildings will be required within the Borough. Indeed, the supporting text to Policy D9 of the London Plan realises that tall buildings can form part of the plan-led approach to facilitating regeneration opportunities and managing future growth. This is especially pertinent where such buildings can make optimal use of the capacity of sites which are well connected to public transport, services, and amenities.

110. Nevertheless, tall buildings can detrimentally affect the character of an area, along with inherent functional and environmental impacts if the development is of an inappropriate design or within a location that is poorly served by public transport, services, and amenities. Therefore, the London Plan states that Borough's should determine if there are locations where tall buildings may be an appropriate form of development, which should be identified on maps in development plans. Furthermore, tall buildings should only be developed in locations that are identified as suitable in development plans. It is therefore necessary for **MM1** to identify Policy LP4 as a strategic policy within the WLP at paragraph 1.12 to ensure consistency with the NPPF, specifically paragraphs 20 – 23.

111. Therefore, in accordance with Policy D9. A of the London Plan, Policy LP4 of the WLP sets out what constitutes a tall and mid-rise building in criteria A and E. In accordance with London Plan Policy D9. B 2, Policy LP4 also clarifies that such buildings will only be appropriate in the tall building zones identified on the Maps provided at Appendix 2 of the WLP. Policy LP4 then sets out the design criteria that buildings would be assessed against when considering the visual impacts of a proposed tall building, its spatial hierarchy and those tall buildings that would be near the River Thames frontage.

112. In assessing the areas where tall buildings would be appropriate, the WLP relies upon the Urban Design Study (2021) as a benchmark for, amongst other things, setting out where tall and mid-rise buildings will be appropriate. The Urban Design Study is a proportionate and robust response to identifying tall building zones and as an overarching policy document, it would be unreasonable to expect it to provide in-depth and specific details for each site across the Borough that is not within such zones.

113. Thus, Policy LP4 is informed by the Council's Urban Design Study which seeks to identify areas that are appropriate for tall buildings, highlighting local context and the importance of heritage constraints such as Conservation Areas. The WLP clearly specifies what a tall and mid-rise building is, and Appendix 2 sets out the zones where they will be appropriate. The Council will seek to restrict tall and mid-rises buildings outside the identified zones. As such the strategy is therefore appropriate, justified by evidence and in general conformity with the approach advocated in the London Plan.

114. Doubts were raised over the requirements of the tall and mid-rise building policy arguing that the acceptability of such buildings should be considered on a case-by-case basis. Furthermore, it was advanced that the definitions used to define a tall and mid-rise buildings were considered too restrictive and would not allow certainty for landowners adjoining or close to tall building zones, where one may seek to erect a tall building and indeed, across other areas of the Borough.

115. We considered the representations regarding the application of Policy LP4 and **MM146** modifies its wording by deleting "*will not be permitted*" and replacing it with "*The Council will seek to restrict proposals for tall buildings outside of the identified tall building zones*", ensuring that the policy is in general conformity with the London Plan. It must be acknowledged that a number of respondents also raised concern that the proposed modification to Policy LP4 has been regarded as the "watering down" of the policy by allowing tall buildings beyond Tall Building Zones. Thus, a careful balancing of the issues is required to ensure that the Policy meets the 4 tests as set out within the Framework.

116. The modification will allow a degree of flexibility and thus, providing opportunities for tall buildings where one can demonstrate other material considerations in support of a tall building beyond an identified tall building zone. However, it must be borne in mind that such opportunities are likely to be extraordinary rather than ordinary, and we are not persuaded that the Borough should be made a free for all in relation to tall buildings across Wandsworth. Such an approach would not be in accordance with the London Plan or be appropriate given the proximity of Westminster World Heritage Site and other Designated Heritage Assets that are spread across the Borough, as well as sensitivity in terms of amenity/living conditions and other important conservation and design considerations. The quality of many parts of the Borough would be vulnerable to buildings that are out of place with their surroundings as a result of their height.

117. Moreover, there is nothing persuasive before us to demonstrate that it is necessary to allow buildings to exceed the appropriate height range within the tall building zones as stated at Criterion D of Policy LP4.

118. Furthermore, although the London Plan states at Policy D9 B.3, that tall buildings "*should only be developed in locations that are identified as suitable in Development Plans*", material considerations may indicate otherwise[2]. Thus, where opportunities exist to develop a tall or mid-rise building outside the identified tall and mid-rise building zones, **MM146** modifies Criterion C and G of Policy LP4 to ensure that the policy is effective and is in general conformity with the London Plan.

Conclusion

119. For the reasons above, the Plan's approach to delivering high quality places for Wandsworth is sound subject to the main modifications we have identified. The Plan will support the creation of high-quality growth within the Borough.

Tackling Climate Change (Policies LP10 to LP14)

120. There are 5 policies within the Tackling Climate Change chapter of the WLP. These seek to provide clear direction in relation to tackling climate change and responding to the climate crisis, energy infrastructure requirements, and water and flooding. The chapter also provides clear guidance on the circular economy, recycling and waste management, and air quality, pollution and managing impacts of development.

121. Policy LP10 (Responding to the Climate Crisis) provides direction to the decision maker regarding sustainable construction and design, reducing carbon dioxide emissions, the energy hierarchy/assessments, overheating, and adapting to climate change. Modifications set out below are required to ensure that the policy is justified and effective. **MM147** requires that in instances where a development cannot achieve zero carbon standard, a financial contribution to the Council's Offset Fund would be required. Clarification has been added to LP10 C.4. **MM148** seeks to ensure that when retrofitting of buildings is undertaken, clarification is required to avert the risk of maladaptation. **MM149**, **MM150** and **MM151** modify paragraphs 15.9, 15.10, 15.16 and 15.17 and bring greater clarification to ensure that renewables such as ground source heat pumps account for potential archaeology, and that whilst the retrofitting of buildings can improve its energy performance, there may be instances where there would be a conflict between climate change objectives and the conservation of heritage assets. There is also a need to ensure greater flexibility for changes to Building Regulations and the carbon emission reduction requirements. This modification also includes a factual update to Building Regulations from 2013 to 2021.

[2] Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

122. Policy LP11 (Energy Infrastructure). **MM152** adds greater flexibility to Policy LP11 so that alternatives to the decentralised energy network can be pursued. This approach is considered justified and ensures that the policy is effective.

123. Policy LP12 (Water and Flooding). Amendments to Criterion A **MM153** and B **MM154** and **MM155**, along with the insertion of a footnote **MM156** to clarify the definition of minor development, to ensure that the plan accords with the technical guidance from the Environment Agency (EA) and that it is effective. For effectiveness, **MM157** deletes Policy LP12 B.5 and inserts a new paragraph at LP12 E. This would correct a typographical error and ensure that there is clarity within the policy.

124. **MM158** amends Policy LP12 C to bring greater clarity and to ensure it captures the latest technical guidance from the EA. This also includes the removal of the words tidal and fluvial from table 15.1 (**MM159**), updating table 15.1 in relation to Flood Zone 3a (**MM160**), dealing with self-contained basements (**MM161**), bedrooms within basements (**MM162**), finished floor levels within areas of fluvial flood risk (**MM163**), and the Table at 15.2 is also amended, with the inclusion of the wording "for basements in areas of risk of flooding" (**MM164, MM165, MM166, MM167, MM168** and **MM169**).

125. **MM170** deletes Policy LP12 E.3 to ensure that it captures the latest advice from the EA whilst **MM171** modifies Policy LP12 H.3 and **MM173** modifies paragraph 15.54 to ensure that justification for exceptional circumstances for development which is not set back the appropriate distance from the landward side of any River Thames tidal flood defence. **MM172** deletes part 7 of Policy LP12 H to ensure that it captures the latest advice from the EA. All of the modifications to Policy LP12 are required to ensure that the policy is justified, to clarify matters, and to ensure that it reflects the latest guidance from the EA.

126. **MM174** modifies and adds a sentence to paragraph 15.73 relating to Policy LP13 (Circular Economy, Recycling and Waste Management). This is to ensure the policy is effective if there is a shortfall in waste management capacity by 2026. It directs the Council to work with operators and stakeholders and may include seeking assistance from other boroughs to address any identified shortfall in waste management capacity. This amendment brings greater clarity to the Plan and supports the Council's aims in providing adequate waste facilities for the Borough.

Conclusion

127. For the reasons above, the Plan's approach to Tackling Climate Change (Policies LP10 to LP14) is sound subject to the main modifications we have identified.

Providing for Wandsworth's People (Policies LP15 to LP22)

128. There are 8 policies within the Providing for Wandsworth's People chapter of the WLP that seek to promote health and wellbeing, public houses and bars, social and community infrastructure, and arts, culture, and entertainment. The chapter also provides clear guidance on play space, new open space, allotments, and food growing spaces, and utilities and digital connectivity infrastructure.

129. **MM175** and **MM176** modifies and amends Policy LP17 B.6 (Social and Community Infrastructure) and a consequential modification to paragraph 16.23. Furthermore, **MM250** modifies Appendix 4 (Glossary) by adding a new definition of Social and Community Infrastructure/Uses. These changes are to ensure that the policy is effective, to provide greater clarity, and to ensure that it is in general conformity with Policy S1 (Developing London's Social Infrastructure) of the London Plan.

130. For effectiveness, **MM177** corrects a publication error to Policy LP22 (Utilities and Digital Connectivity Infrastructure) and adds a further clause at LP22 D. This is to ensure collaboration with Thames Water and Bazalgette Tunnel Limited to support the implementation of the Thames Tideway Tunnel project.

Conclusion

131. For the reasons above, the WLP's approach to providing for Wandsworth's people (Policies LP15 to LP22) is sound subject to the main modifications we have identified. The Plan will support people within the Borough.

Providing Housing (Policies LP23 to LP32)

132. There are 10 policies within the Providing Housing chapter of the WLP that seek to provide clear direction in relation to affordable housing, housing mix, protecting the existing housing stock, conversions, and housing standards. The chapter also provides clear guidance on purpose-built student accommodation, housing with shared facilities, build to rent, specialist housing for vulnerable people, and gypsy and traveller accommodation.

133. Policy LP23 (Affordable Housing) seeks to maximise the delivery of affordable housing in accordance with the London Plan. For effectiveness, **MM178** amends the wording to Policy LP23 and a consequential modification to paragraph 17.13 follows as **MM181.** These ensure that there is greater clarity regarding the relationship between the provision of First Homes as expected by the NPPF and the position of the London Plan in delivering affordable homes.

134. **MM179** modifies the wording to Policy LP23 E to ensure that it is effective and clarifies instances where site specific viability information will be accepted. Although reference to the need to demonstrate exceptional circumstances has been removed from the Policy, we are satisfied that the Policy remains consistent with Policy H5 of the London Plan and ensures that those developments that fail to deliver the minimum level of affordable housing will require robust justification via the Viability Tested Route. To meet the Borough's local need of affordable housing, **MM180** modifies paragraph 17.11 to allow a tenure split of at least 50% low cost rented accommodation. This modification is justified and ensures the policy is effective and in general conformity with the London Plan.

135. To ensure that it is effective, **MM182** modifies the wording to Policy LP27 A.2 (Housing Standards) to ensure that 10 sq. m of external space for 1- and 2-bedroom dwellings and 15 sq. m of external space for dwellings with 3 or more bedrooms is provided. This is to ensure general conformity with Policy D6 of the London Plan. A consequential modification **MM183** also flows from this change and adds a new paragraph at 17.30.

136. **MM184** is necessary as it is unlikely that the Higher Education Provider (HEP) will be named at the planning submission stage. Thus, removal of wording at LP28 A.2 (Purpose-Built Student Accommodation) is required to make the policy effective. **MM185** modifies the wording at Policy LP28 A.6 deleting reference to the use of "appropriate space standards" and replacing it with "functional living space and layouts" to ensure general conformity with Policy H15 of the London Plan. To ensure its effectiveness, **MM186** is a consequential modification to **MM184** to ensure that student accommodation is operated directly by an HEP, with any linkage with multiple HEPs to be secured through an appropriate planning obligation.

137. To ensure that it is effective, **MM187** amends paragraph 17.35 with regard to the Glossary, so that it is consistent with the changes to LP28, ensuring that there is not an overconcentration of single-person accommodation and directs the decision maker to the definitions as set out within the Glossary at Appendix 4 of the Plan. **MM251** is a consequential change to the Glossary and adds the word "Generally" to the definition of neighbourhood level as it was considered too inflexible. A further modification to the Glossary is also required at **MM252** with the deletion of "*and self-contained studios*" from the definition of single-person accommodation as this type of accommodation can contain multiple occupants. These modifications are to ensure that it is consistent with the changes made to Policy LP28 ensuring that the policy is effective.

138. **MM188** and **MM189** to Policy LP29 (Housing with Shared Facilities) are consequential modifications arising from the change to the definition of 'neighbourhood level' and 'single person accommodation' within the Glossary of

the Plan. These are considered necessary to make the Plan effective and to ensure that it is sound.

139. For effectiveness, **MM190** modifies the title to Policy LP31 (Specialist Housing for Vulnerable People and for Older People) to ensure that it encapsulates 'older people'. To ensure that the policy is effective in meeting identified specialist and supported housing need, **MM191** also modifies the wording to LP31 B.1. so that it provides greater clarity regarding the evidence required for the Local Housing Needs Assessment. These are necessary to ensure that the Policy is effective. For effectiveness, **MM192** modifies Policy LP31 to provide greater clarity with regard to its policy basis and ensuring refence to Policy H13 (Specialist Older Persons Housing) of the London Plan. As a result, **MM193**, **MM194, MM195, MM196 and MM197** are consequential modifications to the supporting text, required to reflect the changes to Policy LP31. Cumulatively, these modifications ensure that the policy is effective.

140. To ensure that it remains effective, **MM198** amends the wording to paragraph 17.62 and reflects the Court of Appeal judgement[3] in respect of the definition of Gypsies and Travellers which should include those that have ceased travelling permanently through educational or health needs, or though old age.

Conclusion

141. For the reasons above, the Plan's approach to housing within Wandsworth is sound subject to the main modifications we have identified. The Plan will support housing delivery for all within the Borough.

Building a Strong Economy (Policies LP33 to LP40)

142. There are 8 policies within the Building a Strong Economy chapter of the WLP that seek to provide clear direction in relation to promoting and protecting offices, managing land for industry and distribution, and mixed-use development on economic land. The chapter also provides clear guidance on railway arches, requirements for new economic development, affordable, flexible, and managed workspace, local employment and training opportunities, and protected wharves. Collectively, these policies seek to support the delivery of 8.6ha of industrial and waste management land and for an additional 22,500 sq. m of office floorspace in the local/sub-regional market. For effectiveness, **MM201** makes consequential changes to illustrative Map 18.1 Economic Land to reflect the new Site Allocation NE8 Battersea Studios, ensuring general conformity with the London Plan.

[3] Lisa Smith v SSLUHC & North West Leicestershire Council [2021] EWHC 1650 (Admin)

143. For effectiveness, **MM199** and **MM200** modify Policy LP33 B and LP33 E.2 (Promoting and Protecting Offices) by inserting the new Site Allocation NE8 Battersea Studios, and to ensure that it is in general conformity with Policies E4 and E7 of the London Plan.

144. To ensure that Policy LP34 (Managing Land for Industry and Distribution) is effective, **MM202** modifies the wording to LP34 A.5 to include 'minerals infrastructure sites'. Likewise, **MM203**, **MM204** and **MM205** modify the wording to LP34 B.2, LP34 B.3 and LP34 B.4a respectively to reflect the Plan's support for the provision of B8 floorspace to meet the Borough's need identified by the Council's Housing and Economic Land Availability Assessment, January 2021 (SD-047). These modifications ensure the WLP remains effective and justified. Consequential modifications to paragraph 18.23 (**MM206**), paragraph 18.35 (**MM210**), paragraph 18.37 (**MM212**) and paragraph 18.39 (**MM213**) are also required to reflect the changes to Policy LP34.G and delete references to 'Hubs'. Finally, for effectiveness we have also amended the advertised modifications to **MM201, MM205, MM208 and MM209** to provide clear direction in regard to identifying the BDTQ as a LSIA, also renaming NE8 as 'Battersea Studios', deleting the reference to 'Silverthorne Road'.

145. For effectiveness, **MM207**, **MM208** and **MM209** are consequential amendments to paragraphs 18.28, 18.33 and 18.34 to reflect the creation of the BDTQ LSIA, ensuring that the Plan is in general conformity with Policies E4 and E7 of the London Plan. Likewise, **MM211** deletes paragraph 18.36 as it does not reflect the revised area of the BDTQ, ensuring that policy is effective.

146. **MM214**, **MM215** and **MM216** modify paragraphs Policy A.1, A.2 and A.3 of Policy LP35 (Mixed Use Development on Economic Land) to ensure they are effective and in general conformity with Policies E4 and E7 of the London Plan. It is also required to reinforce and positively reflect the Borough's need for industrial floorspace whilst removing any ambiguity.

147. For effectiveness, **MM217** and **MM218** remove two properties from paragraph 18.50 as 218 Balham High Road is no longer in employment use and to reflect the current use of 124 Latchmere Road and 187 - 207 Lavender Hill.

148. For its effectiveness and clarity, **MM219** modifies Policy LP36 B (Railway Arches) to specify the meaning long term as 24 months or longer when considering development proposals that relate to the reuse of railway arches as industrial and employment land.

149. For effectiveness, **MM220**, **MM221**, **MM222** modify Policy LP38 A, A.2b and A.3 (Affordable and Open Workspace) respectively by clarifying in perpetuity 'or for a minimum of 30 years'. This modification gives users a greater understanding of the Policy requirements and certainty to the period of time floorspace is

required to remain in economic use. A consequential modification to paragraph 18.69 is also required under **MM224**, and **MM223** modifies Policy LP38 B.1e to reflect the changes to the Site Allocation NE8 Battersea Studios Site.

150. To reflect the current position and to ensure its effectiveness, **MM225** modifies paragraph 18.84 and identifies that the recommendations of the Safeguarding Wharves Report 2018 - 2019 have been taken forward. **MM226** redesignates 360-374 Garratt Lane as a Secondary Frontage and redesignates 376 - 408 Garratt Lane as a Core Frontage to reflect its more central location. A consequential change to Appendix 3 also updates these addresses on the list of Designated Frontages (**MM249**).

Conclusion

151. For the reasons above, the Plan's approach to building a strong economy is sound subject to the main modifications we have identified. The Plan will support economic growth within the Borough.

Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres (Policies LP41 to LP48)

152. There are 8 policies within the Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres chapter of the WLP that seek to provide clear direction in relation to Wandsworth's centres and parades, development in centres, out of centre development, and local shops and services. The chapter also provides clear guidance on the evening and night-time economy, visitor accommodation, markets, and meanwhile uses.

153. For effectiveness, **MM227** adds further text to numbered addresses to avoid doubt over which addresses Policy LP41 A.4 (Wandsworth's Centres and Parades) applies to and clarifies whether the address refers to the even numbered properties, the odd numbered properties and whether the range is inclusive.

154. To ensure effectiveness, **MM228** modifies Policy LP45 A.4 (Evening and Night-Time Economy) so that the cumulative impact of proposals on the amenity of surrounding occupiers is taken into account. This also provides greater clarity for the application of the Policy. There is no evidence to suggest that taking account of the cumulative impact of the use would reduce its effectiveness on ensuring that developments do not harm the living conditions of surrounding users and occupiers.

155. For effectiveness, **MM229** and **MM230** modify Policy LP46 A and B (Visitor Accommodation) so that it is clear that the Policy relates to the provision of '*new, or the extension of existing'*, visitor accommodation. **MM230** also provides

clarity for the preference given for the edge of centre sites first. Consequently, there is no requirement to duplicate the extension of existing visitor accommodation through LP46 D, which is duly deleted by **MM231**. This provides greater clarity and ensures that Policy LP46 reflects national policy and is effective.

156. For effectiveness, **MM232** and **MM233** also amend Policy LP46 F.6 and F.7 respectively to provide greater clarity regarding the provisions of ancillary facilities that are open to the public, unless the operational requirements of a hotel make this unfeasible. The phrase "90 consecutive days" is also deleted as Policy LP25 (Protecting the Existing Housing Stock) already seeks to resist the change of residential accommodation to short term holiday lets.

157. **MM234** modifies Policy LP47 (Markets) by adding a further clause to ensure that developments consider the impact it may have upon a market. This is a justified response to ensure that markets are fully considered from the outset as they are a valuable and valued form of retail shopping within the Borough.

Conclusion

158. For the reasons above, the Plan's approach to ensuring vibrancy, vitality, and uniqueness in the Borough is sound subject to the main modifications we have identified.

Sustainable Transport (Policies LP49 to LP52)

159. There are 4 policies within the Sustainable Transport chapter of the WLP that seek to provide clear direction in relation sustainable transport, and transport and development. The chapter also provides clear guidance on parking, servicing, and car free development, and public transport and infrastructure.

160. To ensure its effectiveness, **MM235** modifies Policy LP49 B.4 (Sustainable Transport) to include waterborne freight cargo handling. **MM236** also modifies paragraph 20.9 to include passenger river boats. These modifications are justified in seeking to utilise the River Thames as an important and sustainable transport option.

161. **MM237**, **MM238** and **MM239** modify Policy LP51 (Parking, Servicing and Car Free Development) to ensure general conformity with Policy T6.1 of the London Plan, which reflects the need for London Boroughs to be car free within Opportunity Areas. Consequently, **MM237** inserts a new clause into Policy LP51 D to reflect this, unless parking can be justified. It is noted that TfL also require the insertion of "or" at the end of LP51 D.1 so that it reads "1. *The PTAL is 4 or Higher, or,*" This is in addition to the advertised modification; however, it is

justified to ensure that the Plan is effective. To ensure the policy is effective it is necessary for greater clarity to be provided and **MM238** amends the wording to Policy LP51 E, deleting the ability to submit a Travel Plan to demonstrate non-compliance with the Policy. **MM239** also requires a consequential modification to paragraph 20.36 to ensure that it is in general conformity with the London Plan.

162. For its effectiveness and clarity, **MM240** introduces TfL to the list of consultees at Policy LP52 A.1c (Public Transport and Infrastructure). **MM241** modifies Policy LP52 by adding further paragraphs at LP52 A 2 and 3. These additions provide greater clarity following the Statement of Common Ground with TfL through safeguarding of land for future transport functions and protecting the riverside of the Thames and Wandle as key routes for walking and cycling.

Conclusion

163. For the reasons above, the Plan's approach to delivering sustainable transport is sound subject to the main modifications we have identified. The Plan will support sustainable transport growth within the Borough.

Green and Blue Infrastructure and the Natural Environment (Policies LP53 to LP60)

164. There are 8 policies within the Green and Blue Infrastructure and the Natural Environment chapter of the WLP that seek to provide clear direction in relation to protection and enhancement of green and blue infrastructure, open space, sport and recreation, and biodiversity. The chapter also provides clear guidance on tree management and landscaping, urban greening factor, river corridors, riverside uses, including river-dependent, river-related and river adjacent uses and, moorings and floating structures.

165. **MM242** modifies the wording to Policy LP54 (Open Space, Sport and Recreation) to ensure that it is in conformity with the NPPF by requiring any loss of open space, play space or sport and recreation with an equivalent or better provision of space. To ensure greater clarity, **MM243** modifies LP54 C with reference to 'Indoor Built Facilities Assessment/Strategy, as appropriate'. These modifications are to ensure that the plan is effective in delivering for Open Space, Sport and Recreation.

166. **MM244** modifies Policy LP55 (Biodiversity) by removing the wording "including buffer zones" from LP55 B. 1. **MM245** modifies paragraph 21.30 by stating where information can be found regarding the Borough's Sites of Important Nature Conservation. This removes any ambiguity from the Plan and ensures it is effective. For effectiveness, **MM246** and **MM247** modify the wording to paragraphs 21.31 and 21.32 to provide clarity that all developments, particularly

for new and replacement buildings and extensions to buildings, should utilise any opportunities to attract new species and that the Habitats Regulations Assessments specify that assessments must consider any project that may have an impact on a designation, and reference to the Environment Act which mandates nationally a 10% increase in biodiversity net gain.

167. For its effectiveness, and to provide greater clarity, Policy LP58 C is modified by **MM248** so that it is clear that development should not encroach within 16m (tidal Thames) and 8m (other rivers) of the top of the riverbank.

Conclusion

168. For the reasons above, the Plan's approach to delivering green and blue infrastructure and the protection of the natural environment within the Borough is sound subject to the main modifications we have identified. The Plan will support green and blue infrastructure and natural environment growth and protection within the Borough.

Monitoring and Delivery

Implementation, Delivery and Monitoring (Policies LP61 to LP63)

169. There are 3 policies within the Implementation, Delivery and Monitoring chapter of the WLP that set out how the Council will monitor the performance of the Plan and provide most of the necessary evidence on which to assess the success or failure of delivery and what alternatives might reasonably be provided if necessary. The Authority Monitoring Report (AMR) will be the main mechanism for assessing the Plan's performance and effect. The Plan contains clear indicators for delivery and the Council's monitoring regime should ensure that any risks to non-delivery are 'flagged up' and interventions made to alleviate risks should this prove necessary.

Overall Conclusion and Recommendation

170. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

171. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix to the Wandsworth Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

172. We conclude that if adopted promptly with the recommended MMs, the Plan establishes a five-year supply of deliverable housing sites. Accordingly, we recommend that in these circumstances the LPA will be able to confirm that a five-year housing land supply has been demonstrated in a recently adopted plan in accordance with paragraph 75 and footnote 40 of the NPPF.

Jameson Bridgwater and Graham Wyatt

Inspectors

This report is accompanied by an Appendix containing the Main Modifications.