

GREATER LONDON AUTHORITY

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Department: Planning

Our reference: LDF32/LDD09/ LP02/LG01
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By email: adam.hutchings@richmondandwandsworth.gov.uk
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Dear Adam,

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Draft Local Plan: Pre-Publication Regulation 18 Consultation Version, November 2020

Thank you for consulting the Mayor of London on the Wandsworth Draft Local Plan: Pre-Publication Regulation 18 Consultation Version. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier Wandsworth Local Plan Full Review Issues Document 2018 on 6 February 2019 (Ref: LDF32/LDD09/CG01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is consistent with the Publication London Plan (PLP).

The London Plan

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Secretary of State wrote to the Mayor on 29 January 2021 advising him that he can now publish his plan and as such the Publication London Plan and its evidence base are now material considerations and have significant weight. The new London Plan will be formally published on the 2 March 2021, at which point it will form part of Wandsworth's Development Plan and contain the most up-to-date policies.

General

The borough's vision and objectives are set out clearly early on, and this is welcomed by the Mayor. The draft plan establishes 14 principles underpinning the borough's placemaking ambitions. These guiding principles are applied within place approaches comprised of Placemaking, Smart Growth and People First elements and each follows through into the area strategies later on.

The draft Plan divides the borough into character areas, each with their own area specific strategy, including Wandsworth Town, Nine Elms, Putney and Tooting to name a few. Each of these strategies responds to the unique characteristics, context and growth aspirations of each of these sub-areas. The overall approach is one which is aligned with the Mayor's Good Growth objectives and is welcomed.

It would be clearer if the draft Plan set out early on, perhaps within Policy SS1, its ambitions for growth over the plan period for housing, industry, office and other forms of development, so that they are contained in one place. The plan period should also be made clearer, and possibly included in draft Policy SS1. Early on the plan suggests that it covers the period from 2023 until 2038. However, much of the Local Plan evidence only takes us up to 2034.

Site allocations are set out clearly in maps but could benefit from the inclusion of more information on the ability of the sites to accommodate growth, thereby providing a benchmark for future development proposals.

The Mayor notes Wandsworth's good record of housing delivery over the last five years and will endeavor to continue to support this in line with his objectives for Good Growth.

The draft Plan would benefit from the identification of specific sites and areas that are able to accommodate the borough's future needs for industrial uses and waste management.

As currently drafted, however, there are a number of concerns which left unattended could constitute potential issues of non-conformity with the PLP. This includes the borough's proposed approaches to affordable housing, waste and tall buildings. Each of these is discussed in greater detail later on.

The Mayor is happy to continue working with Wandsworth to provide support on how the approach in the Local Plan might be improved and further evidenced, in order to support the strategic spatial approach, set out in the Publication London Plan and to deliver Good Growth in the borough.

Housing

The PLP sets out how London's housing need can be met within its boundaries and sets Wandsworth a 10-year net housing delivery target of 19,500 units (1,950 per annum) up to 2029 as set out in Table 4.1. Of this target, 4,140 new homes should be identified from small sites (set out in Table 4.2 of the PLP). The emerging Local Plan acknowledges the London Plan targets and commits to meeting them by 2028/29. If Wandsworth requires a target beyond 2029 then paragraph 4.1.11 of the PLP should be considered in collaboration with the GLA and should include rolling forward the borough's small sites target. The Mayor welcomes the borough's acknowledgment of and supportive approach to the PLP housing target for small sites in paragraph 14.60 of the draft Plan and encourages the movement of this reference from the supporting text into the main body of Policy LP7. The borough's commitment to the preparation of an SPD which will identify sites and set out design codes for those sites/areas is also welcomed as it accords with the requirements of London Plan Policy H2 and notes that the

GLA is developing London Plan Guidance which includes guidance on assessing the quality of small site development and preparing design codes to increase housing supply from them. This may be of use when developing the SPD.

Affordable and Specialist Housing

Wandsworth's commitment to meet the Mayor's 50% target for affordable housing as set out in draft policy LP25 is very welcome, however the purpose of the threshold approach is to limit the requirement for viability evidence to those instances where there are real barriers to delivery. The Mayor's threshold approach sets the threshold level for affordable housing at 35% on privately owned land and 50% on publicly owned land or on industrial land where development proposals would result in the loss of industrial capacity. It should be noted that these figures are not targets but rather they are the thresholds above which viability assessments are no longer required as part of the planning process. As currently drafted it appears that it may be the borough's intention to viability test all residential planning applications which would not be in line with the Mayor's threshold approach. However, at paragraph 17.19 of the draft Plan it states that '...it is proposed to adopt a borough specific threshold approach as a starting point for informing individual applications, rather than that set out in the emerging London Plan.' So, it is not entirely clear if it is the borough's intention to set its own independent threshold levels for affordable housing or whether there will be a requirement for viability evidence for all residential proposals in order to seek the maximum reasonable amount of affordable housing. The Mayor would like clarity on this matter which may or may not constitute an issue of non-conformity with the PLP.

To be consistent with the approach in the PLP, viability should only be considered as part of planning applications where the proposed amount of affordable housing falls below the thresholds set out above and part A of draft policy LP25 should be revised accordingly.

As set out in PLP Policy H5, the percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family sized homes. This is because habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. In contrast, paragraph 17.27 of the draft Plan sets out the intention to continue to calculate affordable housing in terms of numbers of dwellings. There is no explanation for this approach, nor is there evidence to support it, and it creates a significant disincentive for the delivery of family sized affordable homes. For consistency the draft Plan should seek to measure affordable housing by habitable rooms rather than by units and draft Policy LP25 should be amended accordingly.

The draft Plan could do more to accommodate the Mayor's preference for maximising social rented housing given the need for this type of tenure across London. The Council's proposed tenure split of 50% low cost rent and 50% intermediate products is within the limits set out in Policy H6 of the PLP but the proposed levels should be based on local and up-to-date evidence. It is understood that the Council undertook a Local Housing Needs Assessment last year (2020). This indicates that Wandsworth has a greater need for social rented rather than intermediate housing but could allocate up to 50% of the affordable housing split as intermediate tenures 'as long as future policies prioritise London Living Rent over Affordable Rent dwellings at 80% market discount' and this should be reflected in the draft Plan, specifically draft Policy LP25 part C. The borough's proposed approach to the tenure split should be supported by up-to-date viability evidence.

Draft Policy LP25 sets a 15% affordable housing target in the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area (OA). The VNEB OA Planning Framework was adopted in March 2012 and was supported by a Development Infrastructure Funding Study which was carried out in 2010. The borough's most up-to-date Local Plan viability evidence was carried out in 2013. The affordable housing target for the VNEB OA was based on this evidence which predates the PLP, so it is generally welcomed that in paragraph 17.19 the borough commits to updating the Viability Assessment and the Development Infrastructure Study (DIFS) to support its approach towards affordable housing. In developing this evidence special regard should be had to:

- The extent to which the Northern Line extension and other VNEB OA infrastructure requirements have been funded and completed;
- The rise in residential values in the borough and the VNEB OA since 2013; and
- The borough's intentions regarding CIL Charging Rates, which are due to be reviewed this year.

Limiting conversions to those dwellings that are larger than 150sqm could be considered to be excessive in light of the fact that the minimum space standard set out in Table 3.1 of the PLP for a six bedroom, eight-person dwelling is 138sqm. Wandsworth should consider revising this figure down.

Given Policy D6 of the PLP which sets a minimum standard for private outside space of 5sqm for a 1-2 person dwelling and 1sqm for each additional occupant, the requirement of draft Policy LP 29 part D, which requires that family sized conversions should each be provided with a dedicated garden of at least 15sqm should be reviewed and afforded more flexibility.

The Mayor welcomes Wandsworth's support for the provision of student accommodation, recognising how it contributes towards meeting the complex housing needs of London as a whole. Draft Policy LP30 references Policy H15 of the PLP but should make it clear that the Mayor's threshold approach applies to purpose-built student accommodation as set out in part A4 of the policy.

Draft Plan policy LP34 sets out that there is currently one authorised Gypsy and Traveller site in the borough, located at Trewint Street, consisting of 11 pitches, and that the Council will safeguard this site to meet identified needs over the Plan period. Draft paragraph 17.74 indicates that there is no identified need for additional pitches over the plan period based on the findings of the council's recent Gypsy and Traveller Accommodation Needs Assessment (2019).

It should be noted that as referenced in PLP paragraph 4.14.2 the Mayor will be initiating and leading a London-wide Gypsy and Traveller accommodation needs assessment, and will work to support boroughs in finding ways to make provision for Gypsy and Traveller accommodation.

Should additional need arise over the Plan period, the Mayor will be making funding available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multiborough basis, and for refurbishment of existing pitches identified via an audit of existing pitches (refer to PLP policy H14 paragraph 4.14.5).

Waste

The Mayor welcomes Wandsworth's acknowledgment in the draft Local Plan of the waste apportionment targets set out in the PLP (in Table 9.2) for 264,000 tonnes by 2021 and beyond and policy LP13 should clearly set out a commitment to meet those targets.

It is welcomed that all waste sites in the borough are to be safeguarded for waste uses which is consistent with policies SI 8 and SI 9 of the PLP. Also welcomed is the policy requirement that 95% of construction and demolition waste be reused, recycled or recovered and so too is the requirement for Circular Economy Statements to accompany all referable planning applications, both of which are in line with Policy SI 7 of the PLP.

It is the Mayor's ambition that the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026 as set out in Policy SI 8 of the PLP and the Mayor welcomes Wandsworth's commitment to contribute to this. However, Policy LP13 of the draft Plan identifies an immediate capacity gap in meeting its waste apportionment target. The immediate capacity gap in 2021 is for 44% of the borough's overall waste apportionment target. An equivalent of 2.1ha of land.

It is noted that the borough has undertaken a Waste Technical Study (2020) however it is still not clear from the draft Plan how Wandsworth is planning to close the identified capacity gap by 2026 in order to meet the Mayor's net self-sufficiency target. Has the borough done any work to partner with other boroughs that might be able to help meet Wandsworth's shortfall?

From paragraph 15.55 of the draft Plan it is understood that the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for household waste for Wandsworth. The Waste Management Service Agreement between WRWA and Cory Environmental Ltd to dispose of WRWA waste ends in 2032 which means that the last six years (if the Plan period runs until 2038) of Wandsworth's draft Plan are not accounted for. In addition to that, as set out in paragraph 9.8.3 of the PLP, waste contracts do not recognise administrative boundaries and waste flows across borders. This means that waste management resulting from the contract could happen outside of London which in turn could contribute to London not being self-sufficient in the management of its waste by 2026. In addition, this type of arrangement means that Wandsworth has less opportunity to move waste management up the waste hierarchy.

The draft Plan should demonstrate an ability to meet Wandsworth's apportionment needs in accordance with the PLP requirements. Development Plans should allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 of the PLP. Following the guidance set out in paragraph 9.8.7 Wandsworth should explore opportunities through site allocations to identify suitable sites to manage the borough's waste arisings and meet the apportionment targets set by the Mayor over the plan period.

It is not clear from the draft Plan if the borough has capacity to deal with its construction, demolition and excavation (C, D & E) waste arisings over the plan period. In addition, Table 15.7 which sets out the amount of waste exported outside of the borough does not establish how much of its waste is exported outside of London. The proposed approach would jeopardise the Mayor's ambition that London be net self-sufficient in the management of its waste by 2026.

Wandsworth is encouraged to form part of a joint waste plan in line with paragraph 9.8.7 of the PLP.

Employment

It is welcome that the draft Local Plan recognises the important role of industrial and related uses for Wandsworth's economy, as well as the importance for London as a whole of retaining industrial floorspace capacity in the borough, in accordance with the PLP.

The borough's strategic approach is underpinned by up to date local evidence as set out in the Employment Land and Premises Study 2020 (ELPS). Based on this study the draft Local Plan identifies a net requirement of 8.6 hectares of industrial land up to 2034, and for an additional 22,500 sqm of office floorspace in the local / sub-regional office market in that same timeframe. The London Industrial Land Demand Study (LILDS) 2017 sets out a need for 16.4ha of industrial land.

Policy LP37 of the draft Local Plan identifies that the forecast increase in demand for industrial land contrasts with a projected loss in supply. If all pipeline (approved) development were to come forward the net supply of industrial land in the borough would reduce by 7.6ha. On the other hand, planned development (applications yet to be approved) would provide 1.3ha of additional industrial land.

The PLP (Policy E4) requires that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution.

Policy LP37, which sets out clearly those uses that are acceptable in the borough's SILs and Locally Significant Industrial Areas (LSIAs – which are the equivalent of the Mayor's Locally Significant Industrial Sites (LSISs)) is welcome and is consistent with PLP Policy E4 part A. Part B3 of the draft Local Plan Policy, however, does not align with the PLP as it accepts increased operating hours or other methods as appropriate measures of industrial intensification; to align with Policy E7 A of the PLP, the intensification of industrial and related business uses should only be assessed in terms of increase in industrial and related floorspace.

Part B4 of the draft Policy LP37 diverges from the PLP in the proposed approach to the introduction of non-industrial uses into the Queenstown Road Battersea SIL (the Battersea Design and Technology Quarter). In accordance with Policy E7 of the PLP, co-location of industrial uses with non-industrial uses is not acceptable within SIL. Therefore, if Wandsworth wish to introduce non-industrial uses within some parts of the Battersea Design and Technology Quarter (BDTQ) it would need to be facilitated by a plan-led or masterplanning intensification, consolidation and release approach, which would result in the de-designation of relevant parts of SIL accommodating non-industrial uses.

It is understood from paragraph 18.36 of the draft Plan that Locally Significant Industrial Areas (LSIAs) are equivalent to Locally Significant Industrial Sites (LSIS) in the Publication London Plan. Given this Wandsworth should consider renaming the LSIAs designation to LSIS or otherwise make this clear, to avoid potential confusion, for example through the application of PLP Policies E6 and E7.

As required by PLP Policy E7 (and the requirements therein) Wandsworth should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. This is particularly important in light of the identified positive demand for industrial and related functions to 2034, as well as the projected reduction in supply of suitable industrial land due to pipeline development.

The draft Plan policies and Site Allocations provide indications of where additional industrial capacity is expected to come forward or could be potentially delivered via industrial intensification over the Plan's period. Specifically, draft Plan Policy LP37 and supporting text provide a clear framework setting out the role that strategic reservoir of industrial land (SILs and LSIAAs) and industrial land and premises in other locations (including EUIAs, EUPAs, Focal Points of Activities, etc) could have in meeting identified demand for industrial and related uses.

However, with the exception of proposals for the BDTQ and some Site Allocations, the draft Plan includes few details on the amount of additional industrial floorspace (and ha-equivalent) that could be delivered in specific locations over the Plan period. It would be helpful to clearly present in the Plan how the identified industrial demand could be met across Wandsworth's industrial and other locations. This could be set out in a schedule providing details on expected and potential gains and losses of industrial capacity (both in terms of floorspace and land-equivalent) across specific locations and sites, highlighting how these cumulatively would ensure that identified industrial and related demand to 2034 is adequately met. These additional details would provide further certainty and ensure that the draft Plan's strategy would be effective in meeting identified demand for industrial and related functions, as well as providing clarity for development management purposes.

Battersea Design and Technology Quarter (BDTQ)

As drafted and based on evidence base work, including the Battersea Design and Technology Quarter Economic Appraisal and Development Framework (BDTQ EADF) the draft Plan proposes to introduce approximately 78,000m² of office space and to increase industrial floorspace by 24,000m² in parts of the Queenstown Road, Battersea SIL. The proposals for the BDTQ would see the expansion on non-industrial uses in this SIL, effectively resulting in a process of co-location of industrial and office uses. This would be contrary to Policy E7 B which states that the scope for co-locating industrial uses with other uses may be considered in LSIS, but not in SIL. Development proposals to implement the BDTQ aspirations and introduce further office uses in SIL would also not align with Policy E5 C which only supports development proposals for industrial-type activities in SIL.

To align Wandsworth's proposals for the BDTQ and PLP Policy E7 Part B the borough should seek to develop a plan-led or masterplanning intensification, consolidation and release approach, clearly setting out in the policies map the areas affected by proposed changes. The process should conform with the approach set out in Policy E7 of the PLP and with the [Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches](#). Particular consideration should be given to the deliverability of the proposed approach, including detailed evidence on intensification typologies, phasing and viability of proposed re-development, as well as to ensuring that industrial intensification would be delivered prior to any consolidation and release of SIL.

The draft Plan, the BDTQ EADF and related site allocations provide a clear development framework and guidance for the potential transformation of parts of the Queenstown Road, Battersea SIL. The draft Plan policy approach goes some way in meeting the requirements of policies E5 and E7 of the PLP, particularly with regard to the protection and enhancement of the industrial character of the area, the development of intensified industrial typologies, the protection of long-term viability and operational conditions for existing and potential industrial uses (including existing heavy industrial uses), and the recognition that residential uses of any kind are not appropriate in SIL.

However, in line with PLP Policy E5 Part A, SILs should be managed proactively through a planned process to sustain them as London's largest concentrations of industrial, logistics and related capacity. Furthermore, PLP Policy E7 Part A states that development plans and development proposals should be proactive and encourage the intensification of industrial-related uses occupying all categories of industrial land. Accordingly, proposals for the BDTQ should prioritise the provision of additional industrial floorspace and primarily maximise the opportunities to increase such provision to meet identified demand for industrial and related uses, also exploring the potential for development of multi-storey industrial schemes.

Economic Use Intensification Areas (EUIAs) and Focal Points of Activity

A more fine-grained approach to the 10ha of vacant and under-utilised land within Focal Points and EUIAs which have the potential for re-development and intensification of industrial capacity would be helpful in understanding where and how much additional industrial capacity could be delivered in these locations. Further work to estimate the potential capacity uplift for industrial uses in these and other locations (including EUPAs and other existing non-designated industrial sites) should be developed to better inform the borough's strategic approach and to ensure enough industrial capacity is identified to meet its industrial needs over the Plan period. The introduction of non-industrial uses within industrial land outside of the strategic reservoir should follow the criteria set out in Policy E7C of the PLP, where this is appropriate, which are partly reflected in Part D of draft Policy LP37.

The borough's intention to secure affordable, flexible and managed workspace is welcome but regard should be had to the definition of 'workspace' as set out in Policy E3 of the PLP. Paragraph 6.3.2 of the PLP defines affordable workspace as workspace that is provided at rents maintained below the market rate for that space for a specific, social, cultural or economic development purpose and Wandsworth should have regard for that definition.

Offices

Draft Policy LP36 should set out clearly what the borough's need for office space is over the plan period. The London Office Policy Review 2017 establishes a composite projection for 117,600m² of office space up to 2041. This is in significant contrast to Wandsworth's evidenced need for just 22,500m² up to 2034 as set out in paragraph 18.13 of the draft Plan. Paragraph 18.9 of the draft Plan sets out that a further 205,000m² has been planned for as part of the VNEB OA Planning Framework. As currently drafted it is not clear how these figures relate to the Employment Land and Premises Study (ELPS) 2020 and the LOPR 2017 and this should be set out clearly within the policy or supporting text so that it is explicitly clear what the spatial growth aspirations for office development are for the borough over the course of the Plan period.

Policy E1 of the PLP is clear that new office development should be focused in the CAZ and directed to the borough's town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity. The Town Centre Network office guidelines in Table A1.1 of the PLP identifies Clapham Junction and Putney as having mixed-use office potential as there is capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments. The PLP identifies Vauxhall and Battersea as CAZ locations with significant office functions. Tooting, Wandsworth, Lavender Hill / Queenstown Road and Balham are all identified as showing demand for existing office functions, generally within smaller units. These locations should be prioritised as the most suitable locations for new office development over the Plan period.

Safeguarded Wharves

The Mayor welcomes Wandsworth's promotion of wharf sites to support the function of moving freight by river and recognition of the Safeguarded Wharves Review 2018-2019 which was granted approval by the Secretary of State in September 2020 and recommends the ongoing safeguarding of all five of Wandsworth's wharves including Smugglers Way, Pier, Kirtling, Cringle Dock and Middle Wharves.

The Mayor's Transport Strategy also seeks to increase the proportion of freight moved on London's waterways; retaining safeguarded wharves is a key enabler of this.

The Mayor welcomes the commitment to the safeguarding of the borough's five wharves in the draft Plan Policy LP43. This is in line with the PLP Policy SI 15 which requires (amongst other things) boroughs to protect existing locations and to support development proposals that facilitate an increase in the amount of freight transported on London's waterways. The policy is also clear that safeguarded wharves should only be used for waterborne freight-handling use, with redevelopment for other uses only where the wharf is no longer viable. Para 9.15.6 of the PLP details an exception for strategic proposals of essential benefit for London which cannot be planned for or delivered on any other site.

Paragraph 9.15.7 of the PLP is clear that where a development proposal for a safeguarded wharf includes land uses unrelated to the handling of waterborne freight, the design of the development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the long-term use and viability of the safeguarded wharf. The freight-handling capacity of the wharf must not be reduced and the reactivation of the wharf for waterborne freight handling must be delivered and secured for the long-term in order for proposals to be deemed acceptable. Part B of draft Policy LP43, paragraph 18.99 which allows for mixed use development on safeguarded wharf sites should ensure that the wharf uses are retained and protected. Any site allocations where this is of relevance and proposed should explicitly state that the wharf use must be retained and protected, preferably under the "Use" heading.

The Mayor welcomes Wandsworth's support for the Agent of Change principle in relation to safeguarded wharves and the borough is encouraged to implement this in accordance with PLP Policy D13.

Wandsworth should note that on 19 February, the Secretary of State issued new Safeguarding Directions for wharves identified in the *Implementation Report - Safeguarded Wharves Review 2018-2019*. The safeguarding directions require that all planning applications affecting safeguarded wharves must be referred to the Mayor.

Thames Policy Area (TPA)

In accordance with PLP Policy SI 14 Wandsworth should establish the precise boundary of the TPA in collaboration with its neighbouring boroughs, including those across the river. In addition, boroughs like Wandsworth are encouraged to plan for the TPA through joint Thames Strategies.

Design

The Mayor welcomes the borough's commitment to ensuring that new development supports the creation of a coherent and high-quality built environment as a key component of the Local Plan with a policy approach underpinned by a deep understanding of the values, character and sensitivity of different parts of the borough. This is broadly in line with the design-led approach

set out in the PLP, particularly as set out in Chapter 3. Policy D1 of the PLP establishes that an understanding of local character is essential in determining how different places may best develop in the future. To this end the Mayor particularly welcomes Wandsworth's commissioning of an Urban Design Study which provides an up-to-date and thorough understanding of the local character in various areas across the borough and which it is understood from paragraph 14.7 is an integral part of the evidence base on which the draft Local Plan has been developed.

Wandsworth's support for a design-led approach to new development including the use of design codes and design review where appropriate, and the use of tools such as 3D digital modelling is particularly welcomed. Local policy should ensure that it is consistent with the requirements for the use of these tools as set out in PLP Policies D2, D4 and D9.

The GLA is developing a number of pieces of London Plan Guidance which may be of use when further refining the policy as the emerging Local Plan progresses. This includes the [Good Quality Homes for all Londoners London Plan Guidance and the Public London Charter](#).

Tall Buildings

The Mayor welcomes that consistent with the requirements of the PLP Policy D9 the draft Local Plan Policy LP4 (together with Appendix 2) defines what is considered a 'tall building' for specific localities, identifies appropriate in principle locations as suitable for tall building development and maps such locations within the draft Local Plan in Map 14.1 Appendix 2 (figures 2-10).

It is welcomed that the borough's approach to tall buildings is based on an understanding of local character and underpinned by an evidence base to this effect, having been identified through the Urban Design Study (including a characterisation study) produced in 2020. It is noted that this Study was tasked with taking into account the factors set out in PLP Policy D1.

The PLP Policy D9 part B 3) sets out that tall buildings should only be developed in locations that are identified as suitable in Development Plans. This should be clarified and reflected in the draft Plan.

It is noted that heights for the identified locations have also been identified (Appendix 2 Table 23.1), however it is not clear whether the heights specified for different areas are intended to represent the appropriate heights for those areas or simply the minimum threshold for what will constitute a 'tall building' with additional height still considered appropriate? This should be clarified, and Wandsworth should ensure that appropriate tall building heights are identified on maps within the Development Plan documents.

In December 2020, the Secretary of State (SoS) made a Direction for PLP Policy D9 which defines the minimum height for a tall building including for any local borough definition as not less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. It is appreciated that the Wandsworth Local Plan Regulation 18 version may have been drafted prior to this amendment. However, any definitions for 'tall buildings' that are less than 6 storeys would now likely be an issue of non-conformity and the draft Local Plan should be revised accordingly. The borough should have regards to paragraph 3.9.3 of the PLP which states that in those areas where there is no local definition, the policy applies to buildings over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

There is a reference made to Historic England's Tall Building Advice Note 2015 in paragraph 14.47 of the draft Plan. Historic England is in the process of updating this Advice Note, a draft

of which was consulted on in early 2020. Dependent on when the updated Advice Note is published, the reference to it in Policy LP 4 (and paragraph 14.47) may require an update.

The borough neighbours another which includes a World Heritage Site (WHS) within its boundary, namely London Borough of Westminster and the Westminster WHS. Given the potential for tall building development to have an impact on the setting of this WHS PLP Policy D9 part C 1 is clear that buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value (OUV) of the World Heritage Site, and the ability to appreciate it. Wandsworth may wish to consider including detail within policy LP4 outlining their approach to this issue and clarifying if any work has been undertaken with the London Borough of Westminster on how potential cross boundary issues are to be addressed and managed.

Heritage

The Mayor welcomes the borough taking a plan led approach to future growth based on a clear understanding of local character which is in line with the approach to good growth that underpins the PLP.

Draft Plan Policy LP3 is welcomed for its intention to protect the significance of the OUV of the Westminster WHS including setting and views which, as stated earlier, lies in close proximity to the LB Wandsworth. The link to the London View Management Framework (LVMF) and promotion of the use of 3D digital analysis to assess potential development impact as set out in paragraph 14.34 is also welcomed.

However, PLP Policy HC2 is clear that neighbouring Boroughs to Local Authorities with World Heritage Sites should include policies in their Development Plans that conserve, promote, actively protect and interpret the OUV of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management. Paragraph 7.2.4 is clear that Wandsworth's Local Plan should contain such policies for the Westminster WHS and should provide a greater level of detail in relation to protecting the OUV of Westminster WHS. Wandsworth may wish to consider the inclusion of a separate policy focused on this issue as well as including relevant detail within the draft Plan Policies LP3 The Historic Environment and LP4 Tall Buildings.

The PLP Policy requires that up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan. It would be useful to understand if the borough has been in communication with Palace of Westminster WHS as part of the plan-making process. Boroughs should work collaboratively when plan-making to identify potential cross boundary visual impacts that may arise and how this issue will be managed over time.

As set out in paragraph 7.2.6 of PLP Policy HC2 it is expected that neighbouring boroughs will be part of the World Heritage Site Steering Groups that contribute to the management of the sites, including the drafting and adoption of Management Plans and the draft Plan should make reference to this as well as the existing statement in paragraph 14.34 which notes that Wandsworth is a stakeholder borough along with adjacent boroughs to protect and manage the OUV of the Westminster WHS including its setting.

Public houses

The Mayor welcomes the borough's recognition of the important role and social function that public houses can play in the local and wider community. Draft Policy L16 is supported and the borough should consider referencing Policy HC7 of the PLP where appropriate.

Evening and night-time economy

The Mayor welcomes reference to his Night-Time Economy Classifications in part A of draft Policy LP48. This reflects paragraph 7.6.3 of the PLP which defines the classification. Wandsworth should set out clearly that Vauxhall and Clapham Junction both have a night-time classification of NT2, as set out in Table A1.1 of the PLP, which means that these are recognised as being areas of regional or sub-regional importance. Putney, Tooting and Wandsworth all have the classification NT3 which means that these are areas with more than local significance. Each night-time area will have its own character, which should be recognised and supported to maintain and enhance the rich diversity of London's night-time economy.

Climate change

The borough's aspirations to become zero carbon by 2050 aligns with the Mayor's ambition that London becomes a zero-carbon city by 2050 and is welcomed.

Air quality

The Mayor welcomes Wandsworth's intention to promote air quality neutral development. It is one of the Mayor's commitments that air quality in London is improved so that it is the best of any major city in the world. There are seven Air Quality Focus Areas (AQFAs) that lie within Wandsworth and in accordance with Policy SI 1B of the PLP the borough should plan for these. Reference to the borough's AQFAs is welcome in paragraph 15.72 and perhaps Wandsworth should consider setting out the requirements for proposals within or close to those areas within the body of a policy and identify them clearly on maps. The Mayor is pleased that Policy SI 1 of the PLP which addresses air quality is reflected in Wandsworth's draft Plan.

Health and wellbeing

The Mayor welcomes Wandsworth's intention to promote health and wellbeing through the draft Local Plan. The requirement for Health Impact Assessments (HIAs) as part of development proposals for more than 50 dwellings aligns well with the Mayor's Good Growth objective GG3 Creating a healthy city. Wandsworth should note paragraph 6.9.5 of the PLP which suggests that Health Impact Assessments could also be a requirement for proposals for particular uses and the definition in the glossary of the PLP which sets out that HIAs should be undertaken as early as possible in the design process to identify opportunities for maximising potential health gains and addressing health inequalities.

Urban greening

The Mayor welcomes that Wandsworth are proposing to follow the urban greening factor approach as set out in Policy G5 of the PLP. The borough should note that the urban greening factors set out in Policy G5 should only be used in the interim until urban greening factors, tailored to local circumstances have been established and this should be made clear in draft Policy LP59.

Clapham Junction Opportunity Area

The draft Plan should set out clearly the precise boundary of the OA and should refer to the indicative figures for growth as set out in Table 2.1 of the PLP as the starting point in establishing the true potential for growth in the area. The indicative figures suggest that there is the potential to deliver in the region of 2,500 new homes and 2,500 new jobs up to 2041.

Transport

We welcome application of Placemaking, Smart Growth and People First principles in developing the Area Strategies, in particular, the need to manage traffic and provide good public transport connectivity, support active travel and work towards the 15-minute neighbourhood. However, the Plan should include policies and measures to ensure that all development contributes towards achieving the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan as well as the Vision Zero road safety objective.

Development principles in the site allocations should be applied consistently throughout the place policies in relation to transport and other matters. Only a few sites are identified as suitable for car free development, yet the London Plan requires all development in the Opportunity Areas covering Nine Elms and Clapham Junction as well as all areas of PTAL 4 – 6 in inner London to be car free. A more consistent approach should be taken for all sites where car free development applies. It would be helpful to provide the PTAL for each site allocation.

We welcome the strong emphasis on applying the Healthy Streets Approach and the positive approach to encouraging active travel. We also welcome strong policies on safeguarding and retaining transport land including specific sites and support for improved bus services and infrastructure including waiting facilities and stands.

Next steps

GLA officers continue to offer their support in order to resolve the issues identified in this letter and to provide guidance.

I hope these comments inform the preparation of the Wandsworth Local Plan and we look forward to continuing to work with you to ensure it aligns with the PLP as well as delivering Wandsworth's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on 020 7983 4000 or at hassan.ahmed@london.gov.uk

Yours sincerely



Lucinda Turner

Assistant Director of Planning

Cc Leonie Cooper, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG



ANNEX 1 – Transport for London Representation

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01/03/2021

Dear Sir/Madam,

Consultation on the first draft of the Wandsworth Local Plan

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the pre-publication version of the Wandsworth Local Plan.

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Publication London Plan and its evidence base are now material considerations and have significant weight. Publication of the final version of the new London Plan is anticipated in March 2021, at which point it will form part of Wandsworth's Development Plan and contain the most up-to-date policies.

Local Plan policies should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

In this context we welcome application of Placemaking, Smart Growth and People First principles in developing the Area Strategies, in particular, the need to manage traffic and provide good public transport connectivity, support active travel and work towards the 15-minute neighbourhood. However, the Plan should include policies and measures to ensure that all development contributes towards achieving the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan as well as the Vision Zero road safety objective.

Some of the principles are not reflected consistently in individual site allocations. Only a few sites are identified as suitable for car free development, yet the London Plan requires all development in the Opportunity Areas covering Nine Elms and Clapham Junction as well as all areas of PTAL 4 – 6 in inner London to be car free. A more consistent approach should be taken for all sites where car free development applies. It would be helpful to provide the PTAL for each site allocation.

We welcome the strong emphasis on applying the Healthy Streets Approach and the positive approach to encouraging active travel. We also welcome strong policies on safeguarding and retaining transport land including specific sites and support for improved bus services and infrastructure including waiting facilities and stands.

Our comments on specific modifications and suggestions for amendments or wording improvements are detailed in appendix A below.

Yours faithfully,

Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

Email: josephinevos@tfl.gov.uk

Appendix A: Specific suggested edits and comments from TfL on the Draft Wandsworth Local Plan

Section		Track change/comment
Wandsworth	PM2	<p>TfL welcomes the strong support given in the accompanying text to the Wandsworth gyratory project and we look forward to continuing to work with the borough to secure its delivery. The date for implementation should be updated to 2025. To reinforce the importance of the gyratory to place-making, a general requirement for developments in the area to provide funding, land or complementary measures towards the project should be clearly stated in Policy PM2.</p> <p>A few sites in the sub-area are identified as being suitable for car free development which is welcomed. However, TfL would want to see car free development encouraged more widely. All sites in Wandsworth sub-area that have a PTAL of 4 or above should be car free and on all other sites parking should be minimised. For clarity, this approach should be included in policy PM2.</p> <p>We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p> <p>TfL would not want any new vehicle access or servicing from roads which forms part of the TLRN. Where possible existing access points direct from the TLRN should be rationalised or closed when sites are redeveloped.</p>
	WT1	<p>TfL welcomes the reference to land being required for the Wandsworth gyratory scheme. In the uses section the wording should be corrected to read: ‘A section of the western and northern part of this site is required...’ The land in question should be excluded from any built form and secured at nil cost to TfL as part of any relevant planning permissions on the site.</p>

Section		Track change/comment
	WT2	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme and that this has been included in planning permission reference: 2012/5286. If any revised applications are submitted for the site, the land required for the gyratory should be secured at nil cost to TfL.
	WT4	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme and that development should not prejudice its delivery. The land in question should be excluded from any built form and secured at nil cost to TfL as part of any relevant planning permissions on the site. Any access for vehicles and servicing should be from Smugglers Way. TfL welcomes the requirement for the site to be car free.
	WT3/WT5/WT6/WT7	TfL would like to see a requirement for all of these sites to be car free.
	WT8	TfL would like to see a requirement for the site to be car free. TfL welcomes the requirement for contributions towards improved public transport. The design and location of the proposed pedestrian crossing of Swandon Way should be discussed with TfL at the earliest opportunity.
	WT9/WT10	TfL welcomes the requirement that continued operation of the safeguarded wharf should not be prejudiced by development. TfL would also support a requirement for contributions to improve public transport and facilities for active travel.
	WT12/WT13	TfL welcomes the requirement for modelling to assess the impact on the TLRN and the requirement for public transport improvements. The most effective means to limit impacts on the road network is to require car free development for any revised planning applications, and TfL would like to see this included in the site allocations.

Section		Track change/comment
	WT14/WT15/WT17	TfL supports the requirement for all three sites to be car free. WT17 contains an operational bus garage. Although it does not provide services for the TfL network, it is still an operational transport use and so the provisions of T3 in the London Plan on safeguarding and retaining land in transport use would still apply. We welcome the requirement that continued operation of the safeguarded wharf should not be prejudiced by development.
	WT16	TfL supports the requirement that parts of the site may be required for highways and/or access improvements and that improvements to public transport would be required. As stated, there will need to be early engagement with TfL and account taken of the proposals for the gyratory. Improvements to walking and cycling access will be essential but the form these take should be flexible to take account of the proposed development and its relationship to other sites.
	WT18	TfL would like to see a requirement for the site to be car free.
	WT19	TfL would like to see a requirement for the site to be car free and welcomes the recommendation that on-site car parking should be removed.
	WT20	TfL would like to see a requirement for the any additional development to be car free and for existing car parking on-site to be reduced.
	WT21	TfL welcomes the suggestion that the number of access points should be rationalised and reduced. We would like to see a requirement for the site to be car free.

<p>Nine Elms</p>	<p>PM3</p>	<p>TfL agrees with the statement in 5.11 that the area provides good potential for car free living. The presumption should be that all development will be car free and this should be clearly stated in policy PM3.</p> <p>TfL supports the Council’s intention to improve connectivity and permeability for pedestrians, cyclists and public transport users. We welcome the requirement for developments to contribute towards this objective including funding and/or infrastructure to help to deliver the Nine Elms Cycling Strategy and specific projects such as the Nine Elms Lane/Battersea Park Road scheme. The proposal for a Nine Elms – Pimlico bridge is subject to further discussion with Westminster City Council before it can be progressed. TfL can provide technical advice and support but there is no commitment or funding at the present time.</p> <p>Plans for improved connections between Battersea Park and Queenstown Road stations are welcomed. Although there are no current plans to provide an all-day London Overground service to Battersea Park station, passive provision should be considered in any redevelopment.</p> <p>We welcome the proposals for urban logistics hubs particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p> <p>The loss of a 24-hour coach facility on the New Covent Garden Market site has caused difficulties for operators coming to London with night stops. The limited daytime parking which remains is used by commuter coaches and private hire coaches (some of which could be working on behalf of scheduled coach operators). Any further reduction in parking for coaches must be carefully considered as it will potentially have a detrimental impact. There may be a need to protect existing facilities and consideration given to enhancing coach parking provision (see comments on sites NE6/NE7/NE8). This will require a strategy for the medium and long term.</p>
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Section		Track change/comment
	NE1/NE3/NE5/NE9/ NE11	TfL would like to see a requirement for these sites to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.
	NE2	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.
	NE4	TfL would like to see a requirement for this site to be car free. Existing parking on the site should be removed, thus making better use of land and encouraging mode shift.

	NE6/NE7/NE8	<p>TfL strongly supports the requirement to retain and protect Battersea bus garage. The site is operated by Abellio and has a capacity of 245 vehicles, which provide TfL bus services. It is in an ideal location on designated Strategic Industrial Land and, as it is not surrounded by residential development, there are no issues relating to the unsocial operating hours. The garage has good access to strategic roads which is vital for the operation of a reliable and cost-effective bus network and public transport, which supports staff to get to and from work. The garage is a significant employer in the area. For every one bus, generally three to four people are employed including bus drivers, engineers, cleaners and garage staff. The garage is required now and in the foreseeable future. If surrounding sites are redeveloped, our strong preference would be for it to stay where it is. If it were to be moved, it would need to be in the immediate vicinity. If the site were to be redeveloped or relocated, capacity must be maintained or increased. On top of additional capacity for future growth, the move to a zero-emission bus fleet means that capacity will be lost on site. As such, we would expect current capacity plus an additional 20 per cent capacity for growth, and to accommodate the electrification of the fleet.</p> <p>Any proposals affecting the bus depot, such as mixed-use redevelopment incorporating bus garage facilities or finding alternative sites will need to ensure that capacity, operational efficiency and flexibility are maintained and enhanced, and that continuity of operation is secured.</p> <p>Battersea bus garage also provides parking facilities for National Express coaches between scheduled services. Some of these coaches have been displaced by the closure of the 24-hour facility at New Covent Garden Market. Layover facilities for coaches continue to be required and London Plan policy T3 should be followed if any changes are proposed.</p> <p>We welcome support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors and the requirement for developments to provide</p>
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Section		Track change/comment
		road space and financial contributions towards delivery of the Nine Elms Corridor proposal or along Queenstown Road.
	NE10	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.
	NE12	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.
	NE13	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.

Section		Track change/comment
Clapham Junction	PM4	<p>As an Opportunity Area, all residential and office development should be car free. This should be clearly expressed in policy PM4 and emphasised in all site allocations within the Opportunity Area.</p> <p>We welcome the commitment to work with Network Rail and TfL to deliver improvements in and around Clapham Junction station, and the intention to improve connectivity and permeability for pedestrians and cyclists and provide additional cycle parking.</p> <p>We also welcome the references in individual site allocations to Crossrail safeguarding and works sites. The plan on Page 119 refers to the Safeguarded Crossrail 2 area which should clarify that this is the 2015 Direction. However, the Area of Surface Interest is not shown on the plan. It is more clearly shown in the plan on page 120. In new Directions expected later this year, it is anticipated that the areas for Crossrail 2 Safeguarding will change. Sites CJ3 and CJ4 appear to be have been transposed on both plans.</p> <p>We welcome the intention to reduce the impact of through traffic in and around the town centre through traffic management, to create more space for pedestrians and better waiting areas for bus passengers, and the requirement for development proposals to contribute towards connectivity and public realm improvements.</p> <p>We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p>
	CJ1	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free. We welcome the intention to seek public transport contributions to improve infrastructure and services.</p>

Section		Track change/comment
	CJ2	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free.</p> <p>TfL welcomes references to Crossrail 2. A project update is provided above.</p> <p>TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p> <p>We welcome the intention to work with Network Rail and TfL to secure suitable stopping facilities for buses and taxis, bus standing facilities and adequate cycle parking close to the station entrance.</p>

Section		Track change/comment
	CJ3	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free.</p> <p>TfL welcomes references to Crossrail 2 works sites. A project update is provided above.</p> <p>TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p> <p>The requirement for engagement should be with TfL rather than the bus operator because services are provided by a range of operators under contract to TfL, which is responsible for all bus infrastructure. We would want to ensure that any redevelopment proposals enhance bus passenger and standing facilities, improve operational efficiency and provide for future expansion.</p>
	CJ4	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free.</p> <p>TfL welcomes references to Crossrail 2 works sites. However, it is not clear what is meant by the site being within a '200 metre buffer'. A project update is provided above.</p> <p>TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p>

Section		Track change/comment
	CJ5	<p>Those parts of the site that fall within the Opportunity Area or have a high PTAL should be car free.</p> <p>Bus standing and turning facilities should be retained and improved as part of any redevelopment and contributions provided towards implementation of the York Road Corridor Study</p>
Putney	PM5	<p>Given the high PTAL, opportunities for active travel and its designation as an Air Quality Focus Area, all residential and office development should be car free. This should be clearly expressed in policy PM5 and emphasised in all site allocations.</p> <p>We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p>
	PUT1	<p>TfL welcomes the proposal for the site to provide much needed bus terminating and standing facilities (which should include drivers' facilities as part of any redevelopment). Early dialogue with TfL is advised to ensure that any provision meets operational needs.</p> <p>However, the suggested provision of car parking is not justified because the area is already congested, with high levels of pollutants generated by traffic. Parking would take up additional, valuable development space and there are other parking alternatives nearby. Any development should be car free to take advantage of the high PTAL and the opportunities for active travel. In this context, local cycle route improvements would be welcomed.</p>
	PUT2/PUT3/ PUT4/PUT5	<p>Any development on these sites should be car free and existing parking should not be replaced to take advantage of the high PTAL and the opportunities for active travel.</p>

Section		Track change/comment
Tooting	PM6	<p>Given the high PTAL, opportunities for active travel and its designation as an Air Quality Focus Area, all residential and office development should be car free. This should be clearly expressed in policy PM6 and emphasised in all site allocations.</p> <p>TfL welcomes measures to improve bus speeds and bus standing facilities as well as improvements to Cycle Superhighway 7 and other cycle lanes.</p> <p>Widened pavements and traffic management measures to reduce the dominance of cars and improve opportunities for active travel are also welcomed.</p>
	TO1	<p>TfL welcomes the proposal for contributions towards bus service improvements and the requirement to provide much needed bus terminating and standing facilities (which should include drivers' facilities as part of any redevelopment). Early dialogue with TfL is advised to ensure that any provision meets operational needs.</p> <p>However, the suggested provision of car parking is not justified because the area is already congested, with high levels of pollutants generated by traffic. Parking would take up additional, valuable development space and there are other parking alternatives nearby. Any development should be car free to take advantage of the high PTAL and the opportunities for active travel. In this context, local cycle route improvements would be welcomed.</p>
	TO2	<p>Any development should be car free and the re-provision of hospital car parking should be limited to operational needs and Blue Badge car parking.</p>
	TO3	<p>Any development should be car free and existing parking removed.</p> <p>Care will need to be taken with access to minimise the impact on bus stops/stands.</p>

Section		Track change/comment
Roehampton	PM7	<p>TfL welcomes the proposals to encourage a modal shift to walking and cycling, including the creation of new pedestrian and cycle connections.</p> <p>TfL also welcomes proposals to improve bus stops by relocating them in the main carriageway</p>
	RO1	<p>TfL welcomes proposals for any redevelopment to contribute towards improved walking and cycling facilities, enhanced bus services and bus supporting facilities including stops, stands and drivers' facilities. Any relocation of the bus turnaround must ensure that it provides for improved operational efficiency and maximises flexibility. Advice should be sought from TfL on this issue.</p>
	RO3	<p>Any development should be car free and the re-provision of hospital car parking should be limited to operational needs and Blue Badge car parking.</p>
Balham	PM8	<p>Given the high PTAL and opportunities for active travel, all residential and office development should be car free. This should be clearly expressed in policy PM6 and emphasised in all site allocations.</p> <p>TfL welcomes measures to improve bus speeds and bus passenger waiting facilities as well as improvements to Cycle Superhighway 7 and other cycle lanes.</p> <p>TfL welcomes the requirement for development proposals to the eastern end of the town centre to reduce the dominance of existing surface car parking. However, this should go further by stating that car parking should be reduced (including removal of any surplus or under-used spaces).</p>
	BA1	<p>Any redevelopment of the site should be car free. The opportunity should be taken to reduce the amount of public parking on site to maximise the developable area and to take into account the site's town centre location, high PTAL and opportunities for active travel.</p>

Section		Track change/comment
Wandsworth's Riverside	PM9	<p>All developments with a PTAL of 4 or above should be car free and this should be clearly expressed in policy PM9 and emphasised in all relevant site allocations.</p> <p>We welcome the support for river transport for both passengers and freight, and improved walking and cycling routes along the riverside and connections to the surrounding area.</p>
	RIV11	The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.
	RIV12	The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.
Sites outside designated sub-areas	OUT3	Any redevelopment of this site should take the opportunity to reduce car parking and ensure that it does not exceed London Plan maximum standards.
	OUT4	The introduction of new uses should be car free, and the opportunity taken to reduce any existing parking to cater for operational use and Blue Badge holders only.
	OUT5	The introduction of new uses should be car free, and the opportunity taken to reduce any existing parking to cater for operational use and Blue Badge holders only.
Urban Design	LP1	<p>TfL welcomes the encouragement of active travel and improved permeability. A useful cross reference could be made to the Healthy Streets Approach.</p> <p>Point 9 should state that ground floor design should give priority to providing high quality and safe access for people on foot and cycle rather than vehicle access.</p> <p>In line with Policy T6 in the London Plan, Parking Design and Management Plans should be required where parking is provided. The Mayor will be issuing guidance on this shortly.</p>

Section		Track change/comment
Tackling Climate Change	LP14	<p>The contribution of reduced car use to improving air and noise pollution should be mentioned. Providing zero or limited car parking at new developments can help to manage and mitigate the impacts of new development.</p> <p>TfL welcomes the application of the Agent of Change principle, which is relevant to development adjacent to, or linked with, transport infrastructure.</p>
Providing for Wandsworth's People	LP15	<p>TfL welcomes the emphasis on reducing car dependency, although specific measures to achieve this should be identified and set out.</p> <p>The policy and supporting text should reference the application of the Healthy Streets Approach as a practical measure to improve health and wellbeing as well as quality of place.</p>
Building a Strong Economy	LP43	<p>TfL welcomes the protection given to safeguarded wharves, which provide important infrastructure to support the transport of goods along the river. Given the presence of the wharves, the use of river transport for construction (including removal of waste) and bulk deliveries should be secured through planning conditions or obligations for larger sites, or areas with clusters of sites, where cooperation and consolidation may be possible (e.g. Wandsworth and Nine Elms).</p>
	LP50	<p>LP50 provides support for meanwhile uses which could be relevant for sites that are safeguarded for major transport projects such as Crossrail 2.</p>

Section		Track change/comment
Sustainable Transport	LP51	<p>TfL broadly supports this policy including the emphasis on Healthy Streets, reducing car dominance and improving conditions for walking, cycling and public transport. It would be helpful to include a direct reference to the objective set out in the borough's LIP reflecting Mayoral targets to achieve a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041 and state that development proposals will be expected to contribute towards achieving the target. It would also be helpful to include a reference to Vision Zero, in the context of road safety.</p> <p>In 20.9 the definition of sustainable transport modes is too widely drawn because low and ultra-low emission vehicles and car sharing do not address issues of congestion, road danger, severance and making streets less attractive for walking, cycling and dwelling. The MTS makes clear that car-based modes (including taxis and private hire vehicles as well as those listed above) are <u>not</u> included in the mix of sustainable modes for the purposes of modal split targets and the text should be amended to reflect this.</p> <p>Map 21 – Cycling Routes is helpful in identifying gaps in the network. It would be useful to confirm that contributions from developments will be secured to extend and improve the network.</p>
	LP52	<p>TfL welcomes the requirement for major trip generating development to be located where there is sufficient public transport access and capacity. The policy should also refer to the importance of connectivity by active travel modes.</p> <p>Although it is referred to elsewhere, the policy wording could be more explicit about the need for mitigation in the form of planning obligations or CIL contributions to remedy any deficiencies in access, capacity or connectivity.</p>

	LP53	<p>TfL welcomes the requirement to comply with London Plan standards for both cycle parking and car parking. We welcome the importance attached to the quality as well as the quantity of cycle parking in 20.29. This could usefully reference guidance on cycle parking in the London Cycling Design Standards</p> <p>However, it is not appropriate as suggested here to substitute cycle hire provision for adequate cycle parking. The two serve different markets because cycle hire is designed for short trips when a personal cycle is not available e.g. for visitors, one leg of a complex multi modal trip or for leisure cycling, and does not provide the flexibility or certainty for the regular user that guaranteed access to cycle parking at the home, workplace or shopping destination does provide. Any requirement for contributions towards cycle hire provision should be additional to meeting minimum cycle parking standards and not in lieu of it.</p> <p>The wording of part B should make clear that by referencing Table 10.3 of the London Plan, it is only covering residential car parking. Part C should clarify that maximum retail parking standards in Table 10.5 of the London Plan would be applied and the text in 20.25 should remove mention of retail and leisure car parking being considered favourably where PTAL is high because all retail developments in PTAL 5 and 6 should be car free. Similarly, the text later in the same paragraph that states developments should provide ‘adequate’ car parking must be removed.</p> <p>It should be noted that car clubs may play a role in reducing car dependency, but only if they are paired with measures to reduce private car ownership, rather than effectively widening access to car use. The London Plan counts car clubs towards the maximum parking standards for this reason and Policy T6.1 D makes it clear that they are not appropriate in the Central Activities Zone.</p> <p>TfL welcomes the requirement for electric vehicle charging points to be provided in line with London Plan requirements. In 20.31 caution should be exercised when encouraging rapid</p>
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Section		Track change/comment
		charging facilities at destinations such as retail developments because this risks encouraging additional car trips solely to visit the rapid charging points rather than using a charging facility at home.

Section	Track change/comment
	<p>In Parts I and J TfL welcomes the encouragement given to conversion of car parking to other uses, but in part I it should be extended from just residential conversions to all forms of development. In Part J it should be noted that there are underlying trends towards a reduction in retail trips, particularly by car and so looking into the future, the requirement for car parking is likely to decrease over time.</p> <p>In part K car free residential development should be required for PTAL 4 and above while all office development should be car free. The wording of 20.32 needs to be updated to reflect this car free requirement for all office developments. The additional requirement for public transport interchanges to be close by is superfluous and should be deleted. A single station, interchange or stop serving a range of destinations may result in a high PTAL and would provide an appropriate location for car free development. Similarly, it should not be a requirement for a Transport Assessment to have to demonstrate the case for car free development where this is compliant with the London Plan parking standards.</p> <p>In Part L TfL welcomes encouragement of low car development although this should apply only to residential development in PTAL 3 and appropriate locations in a lower PTAL (e.g. where connectivity is good, active travel opportunities are available or where public transport improvements are planned). As noted above car free (rather than just low car) development is required in PTAL 4.</p> <p>TfL welcomes the continued commitment to no additional parking permits being issued to occupiers of new housing. For existing occupiers being rehoused as part of estate redevelopments, parking permits should be limited to residents who already have parking permits or who own and park a car on the estate.</p>

Section	Track change/comment
	<p>We would like to see an additional commitment to extend CPZs or other parking controls where these are considered necessary to address potential concerns about on street parking pressures. Funding from development can be used to carry out surveys and implementation. The absence of a CPZ should not be used as a justification for providing additional car parking. This should be referenced in the text in 20.26 and in 20.33.</p> <p>In 20.27 we welcome the requirement for Delivery and Servicing Plans and Construction Logistics Plans. These should be updated to reference London Plan Policy T7 rather than the London Freight Plan. The Local Plan should also provide general encouragement to the development of facilities to promote the sustainable movement or transfer of freight and to ensure opportunities are taken to minimise freight impacts of development on the transport network.</p>

	LP54	<p>TfL welcomes the Council’s support for, and commitment to, the major transport infrastructure projects listed in part A, including the Northern line extension to Battersea and Crossrail 2. The Local Plan should take account of the following project update for Crossrail 2:</p> <p><i>‘The funding agreement with the Government of 31 October 2020 includes a commitment by TfL in relation to Crossrail 2 that TfL “prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project as required.”</i></p> <p><i>We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme’s latest proposed route from future developments. We are in discussion with DfT on the likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed.</i></p> <p><i>Given TfL’s current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London’s growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.’</i></p> <p>Crossrail 2 Safeguarding appears on various plans in the document and looks to reflect the 2015 Safeguarding Directions, including the route alignment and Areas of Surface Interest (AOSI) as set out in the plans accompanying the Direction. Where Crossrail 2 Safeguarding is mentioned it should be made clear that it is the Crossrail 2 2015 Directions and plans that are being referred to</p> <p>Paragraph 20.6 provides in principle support for a further extension of the Northern line beyond Battersea to Clapham Junction. There are no current plans for an extension beyond the planned terminus at Battersea Power Station and it does not feature in the list of strategic transport</p>
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Section		Track change/comment
		schemes in Table 10.1 of the London Plan. As such, it would be unlikely to go ahead within the Local Plan timeframe.
		<p>The section on safeguarding and retention of transport land in part A 1 is welcomed, but the wording should more closely follow London Plan Policy T3. For clarity, it would be helpful to refer to TfL as well as other stakeholders. This includes bus garages and rail depots where TfL may not be the owner nor the operator.</p> <p>TfL also welcomes the intention to safeguard land for future transport functions. This should include both statutory safeguarding and transport projects or areas for expansion where there is a likelihood that land may be required within the Local Plan period. Land for freight uses, including: transfer, interchange, consolidation and last mile deliveries may also need to be identified. Although financial contributions may be appropriate and justified, they should not be an alternative to the provision of land where this has been identified as necessary to implement a project.</p> <p>TfL welcomes the reference to the Healthy Streets Approach in part B but the bullet points 1 – 4 all seem to relate to provision of riverside walks mentioned under part A 3.</p>