

GREATER LONDON AUTHORITY

Adam Hutchings

London Borough of Wandsworth
Planning Policy, Environment &
Community Services
Town Hall
Wandsworth High Street
London, SW18 2PU

Department: Planning

Our reference: LDF32/LDD09/ LP03/NM01
Date: 28/02/2022

By email: adam.hutchings@richmondandwandsworth.gov.uk
planningpolicy@wandsworth.gov.uk

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: Publication Regulation 19 Consultation Version, January 2022

Thank you for consulting the Mayor of London on the Wandsworth Draft Local Plan: Publication Regulation 19 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) and on the Pre-Publication Regulation 18 Consultation Version, November 2020 (Ref: LDF32/LDD09/LP02/LG01 on 01/03/2021). 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 London Plan 2021 (LP2021).

The London Plan

The London Plan 2021 was formally published on the 2 March 2021, and now forms part of London Borough Wandsworth's (LBW) Development Plan and contains the most up-to-date policies.

General

We note LBW's Covid 19 recovery plan, and this letter provides an opportunity to draw your attention to [the Mayor's pandemic recovery missions](#). There are nine missions in total, including high streets for all, enabling resilient communities and digital access for all, which may be useful in helping to develop the spatial strategy for Wandsworth further.

The borough's Local Plan vision and objectives are clearly set out early on, and this is welcomed by the Mayor. The draft plan establishes 14 principles, applied within place approaches comprised of Placemaking, Smart Growth and People First – which are carried through into area strategies.

The draft Plan divides the borough into character areas, each with their own area specific strategy, which respond to the unique characteristics, context and growth aspirations of each of these sub-areas, and which include site allocations. General development policies follow. The overall approach is one which is aligned with the Mayor's Good Growth objectives and is welcomed.

However, as currently drafted, the Mayor considers that the borough's approach to industrial land constitutes an issue of general conformity. He also has concerns regarding affordable housing. These are discussed in greater detail under relevant headings.

The Mayor notes and welcomes the inclusion of Policy SDS1 which sets out the overall Spatial Development Strategy. This now includes a housing target of 20,311 new homes over the plan period, including 1,950 new homes per annum up until 2028/29, of which small sites comprise 414 per annum. This aligns with Wandsworth's targets in the London Plan (including Policy H2 on small site allocations) and is welcome. The plan period has also been clearly indicated (to 2038) in SDS1. Site allocations are set out clearly on maps and some additional detail has been provided to indicate the potential of sites to accommodate growth.

It is noted that the promotion of the economy and local employment is a main objective of the plan, and while the commitment to a net increase in industrial floorspace expressed in SDS1 (Part E 3) is supported, the Mayor has broader general conformity concerns regarding the provision of non-industrial uses in SIL and concerns over the deliverability of this strategy.

Officers are happy to continue working with Wandsworth to provide support to resolve non-conformity concerns regarding the strategic spatial approach to industrial land in order to support the delivery of Good Growth in the borough in line with the London Plan.

Housing

The London Plan 2021 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 LP2021). The Local Plan sets a housing target of 20,311 homes over the plan period and includes a commitment to delivering 1,950 new homes per annum up until 2028/29 and to providing 414 new homes per annum from small sites across the entire plan period, taking a sequential approach to

the location of new allocations. This aligns with the London Plan targets. The draft plan maintains the borough's commitment to the preparation of an SPD which will identify sites and set out design codes for those sites/areas and this is welcomed as it accords with the requirements of London Plan Policy H2. The Mayor has recently published for consultation draft London Plan guidance on design and characterisation consisting of characterisation and growth strategy guidance, small site design codes guidance, optimising site capacity guidance and housing design standards guidance. This should inform the development of the SPD – and can be found at <https://consult.london.gov.uk/hub-page/london-plan-guidance-2>.

Affordable and Specialist Housing

The draft plan sets out in LP23 A Wandsworth's commitment to meet the Mayor's 50% strategic target for affordable housing which the Mayor welcomes, as he does the references in LP23 B to Policy H5 and the confirmation that developments of 10+ units (gross) must provide on-site affordable housing in line with the threshold approach. He also notes the revision to the supporting text para 17.16 that this is measured in habitable rooms in line with Policy H5.

LP23 Part C sets a tenure split of 50:50 (social/affordable rent: intermediate) with 25% for First Homes. Whilst para 17.12 acknowledges the London Plan's requirement for provision to be focused on genuinely affordable tenures and commits to prioritising these tenures, the Plan also proposes a broader spectrum of affordable housing provision including other intermediate products such as Shared Equity, Discounted Market Sale and Intermediate Rent. While the London Plan does not prevent a focus on these other tenures, the Mayor would not support an approach which made Discount Market Sale a preferred tenure.

Although a 50:50 split is within the limits of Policy H6 LP2021, the Mayor considers that given the extent of need¹ – including as detailed in the Council's Local Housing Needs Assessment (2020) – the inclusion of 25% First Homes requirement with a variable discount (depending on viability) before exploring greater proportions of low-cost and intermediate rents to provide for a range of incomes, is a concern. Moreover, the London Plan is clear that intermediate ownership products should be affordable to households with incomes up to £90,000. It is considered unlikely that First Homes – even with a deep discount to market value – can deliver genuinely affordable homes to a range of household incomes up to this cap, therefore more information is needed surrounding First Homes deliverability and affordability in Wandsworth in the context of strategic and local need². Does the borough, for example have evidence which demonstrates that First Homes are attainable to households in Wandsworth that are considered to be in need of intermediate homes, or that they would be more affordable than other intermediate products (without making Social Rent or London Affordable Rent unviable)? Additionally, does it have the resources available

¹ The London SHMA identified that 47% of London's housing need is for low-cost rent homes.

² This is clear from their needs assessment which states: "It might therefore be sensible to allocate up to 50 per cent of the discretionary target (i.e. 20% overall) to intermediate tenures as long as future policies prioritise London Living Rent over Affordable Rent at 80% market discount dwellings, which are less affordable".

to administer First Homes (i.e. the discount to market value, affordability requirements, household eligibility criteria etc) for each subsequent sale in perpetuity at the scale envisaged in the policy? Overall, the Mayor would like to be assured that the issues for consideration set out in the GLA's First Homes Practice Note (July 2021) have been fully explored.

The Mayor welcomes the requirements in Policy LP27 Housing Standards to meeting the housing standards set out in Policy D6 LP2021, the accessible housing requirements in Policy D7 LP2021, and to being in accordance with Policy D5 LP2021 and achieving the highest standards of fire safety in line with Policy D12 LP2021. He also notes and supports the downward revision to the policy limiting conversions to those dwellings larger than 130sqm (as opposed to 150sqm previously).

The Mayor notes and accepts that it is LBW's intention to retain a policy for family sized conversions (over 130sqm) to be provided with direct access to a dedicated garden of at least 15sqm and notes the justification that the borough consider 15sqm more usable and that this will generally apply to ground floor units which can be provided with direct access.

The Mayor welcomes the clarity provided in Policy LP28 A that the Mayor's Threshold Approach applies to purpose built student accommodation, to support the delivery of affordable accommodation.

Policy LP32 safeguards the existing Gypsy and Traveller site at Trewint Street to meet identified needs over the Plan period and commits to identifying new sites should any additional need arise over the plan period. The supporting text indicates at paragraph 17.63 that there is currently no identified need for additional pitches on this site or elsewhere within the borough based on its Gypsy and Traveller Accommodation Needs Assessment (2019).

It should be noted that the Mayor is commissioning and overseeing a London-wide Gypsy and Traveller accommodation needs assessment. We expect findings to be available in early 2023 and will share these with boroughs. Meanwhile, boroughs should plan to meet need as identified in any needs assessment they have conducted since 2008, or, in the absence of a local assessment conducted since 2008, the need identified in Table 4.4 of the Plan.

The Mayor will support boroughs in finding ways to provide Gypsy and Traveller accommodation. Funding is available for boroughs and other registered housing providers through his Affordable Homes Programmes for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches where an audit of existing pitches (refer to LP2021 Policy H14 paragraph 4.14.5) identifies that refurbishment is needed.

Waste

The Mayor welcomes the clarity of SDS1 Part G which sets out a clear commitment to meeting identified waste needs through protecting existing waste sites, identifying suitable areas for new recycling and waste management facilities and supporting the Mayor's ambition of net zero waste by 2026 through the circular economy. This is further detailed in Policy LP13, although the plan does not identify any specific additional sites or areas for

waste, which the Mayor considers misses an opportunity, and calls into question the deliverability of the plan approach, given the identified waste capacity gap.

The Mayor welcomes Wandsworth's commitment in Policy LP13 A to meeting its waste apportionment targets which it sets out in Table 15.5 of the Local Plan. These are in line with the apportionment figures in Table 9.2 of LP2021 for 264,000 tonnes by 2021 and beyond.

All existing waste sites are safeguarded for waste use (as stated in para 15.67) which is in line with Policies SI 8 and SI 9 of the London Plan. Also welcomed is the policy requirement in LP13 C that 95% of construction and demolition waste be reused, recycled or recovered for beneficial use 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 LP2021.

Wandsworth's support in LP13 A for the Mayor's net self-sufficiency target is noted. However, the Mayor remains concerned about the immediate identified capacity gap in meeting its waste apportionment target. This amounts to up to 2.1ha land in 2021, depending on the type of facility. Para 15.73 should commit to closing the gap, rather than 'seeking to' close it, which better supports the commitment set out in policy. This paragraph also sets out where new facilities will be directed, but otherwise the paragraph states that beyond 2026 where waste management targets have not been met, LBW will monitor and 'work with the GLA to engage with operators to encourage additional waste management capacity'. As the Greater London Authority is not a waste planning authority, the Mayor considers that it is for the borough to take a more proactive approach to delivering additional capacity, in line with paragraph 9.8.6 and 9.8.7 of the London Plan, and to documenting effective cooperation and clearly setting out where it has gone as far as it is able to. While the Mayor notes the borough's Waste Export evidence base study which records and audits issues raised through the duty to cooperate engagement on waste exports between Jan-March 2021, LBW is encouraged to consider how it can go further. Wandsworth needs to proactively engage with neighbouring boroughs to provide greater reassurance that its plan approach is deliverable. This could include:

- allocating more waste sites within the borough or outside, in line with Policy SI 8 B4 (a-c), which could include SIL/LSIS,
- considering intensification of existing safeguarded waste management sites which would require Wandsworth to demonstrate spare capacity or that it can accommodate additional capacity; and
- where apportionment targets are not going to be met in the borough, seeking to enter into joint waste plans, joint evidence and bi-lateral agreements to transfer the borough's apportionment and show how these can be met in the respective agreement/joint plan.

The reference to meeting 100% of C&D Waste including hazardous waste is welcome, and while it is noted that the borough will seek opportunities for the beneficial use of excavation waste within the borough, paragraph 15.71 notes that not all excavation waste is expected to be used within the borough.

Employment

Previous comments set out the need for the plan to identify specific sites and areas to accommodate future industrial and waste uses and while the Mayor is pleased to note that some of the site allocations set an expectation of a percentage increase in existing industrial floorspace (e.g. the Riverside Business Centre site allocation (WV1) which now identifies a need for at least a 50% increase in the existing amount of industrial floorspace, and the Frogmore Cluster, WT6, WT7 and WT3 which seeks an uplift of 25% existing industrial floorspace and office). However, the **overall scale of losses and gains are not easy to follow**, and these should be set out clearly within the plan itself, rather than depending on referring to other evidence base documents such as the HELAA. This would assist future monitoring, which will be important to ensure that the delivery of industrial intensification in particular can be kept under review. It would provide greater clarity to developers if this was also expressed in floorspace equivalent figures, and to ensure that these uplifts are consistently expressed in terms of 'industrial' floorspace rather than just 'economic' use – where appropriate.

The Mayor welcomes the commitment to a net increase in industrial floorspace expressed in SDS1 (Part E 3), and he is pleased to see the clear acknowledgement in para 18.23 of the importance of retention and protection of the borough's existing remaining industrial land, as well as the need for intensified industrial floorspace where appropriate. He also notes and welcomes the changes to Part B3 which no longer accepts increased operating hours as an appropriate measure of intensification. However, he remains unpersuaded that the plan will deliver the required need for industrial floorspace, given that it perversely appears to depend almost entirely upon the introduction of non-industrial uses within SIL which is contrary to the London Plan. Specifically, the draft Local Plan is **not in general conformity** with the following policies:

- Policy E4A – which makes it a requirement that Local Plans should ensure there is a sufficient supply of land and premises to meet current and future demands for industrial and related functions;
- Policy E7B – which is clear that the scope for co-locating industrial uses with residential and other non-industrial uses may be considered within Locally Significant Industrial Sites (LSIS), but not SIL.

Policy LP34 sets out clearly that the council will support applications for specified industrial uses in the borough's SILs and Locally Significant Industrial Areas (LSIAs – which are the equivalent of the Mayor's Locally Significant Industrial Sites (LSISs)). However, the Mayor would stress that the **strategic importance of SIL derives from the types of uses which it can accommodate** – i.e. those uses which can be difficult to accommodate elsewhere. See paragraph 6.5.1 of the LP2021:

“London's SILs, listed in Table 6.2 and illustrated in Figure 6.1, are the capital's main reservoir of land for industrial, logistics and related uses. **SILs are given strategic protection** because they are critical to the effective functioning of London's economy. **They can accommodate activities which - by virtue of their scale, noise,**

odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.”

The **Queenstown Road Battersea SIL** area is in close proximity to central London, where there is little SIL-type industrial land. For this reason the Mayor strongly supports the need to retain SIL *in this location* to facilitate sustainable servicing of the CAZ. LBW also have demand for additional industrial floorspace, in particular B8 uses, which needs to be met (Paragraph 8.11 of the borough’s ELPS 2020 sets out the increasing demand for B8 uses within the borough with paragraph 8.13 contrasting this starkly with the projected loss in supply. It is notable that this draft of the plan has removed previous references to the projected loss of industrial floorspace, and the anticipated impact this will have on meeting demand). The HELAA makes clear that the majority of this floorspace need can realistically only be met within this SIL. The Mayor continues to have concerns therefore about the overall strategy for large-scale co-location of other uses including offices in this SIL, and specific policy wording including LP34 Part B4 – which is central to LBW’s vision and strategy for its Battersea Design and Technology Quarter (BDTQ). There is also insufficient evidence, if the potential intensification sites are viable/deliverable to accommodate the different types of industrial uses that need to be accommodated in a SIL.

There is no space within the borough for additional industrial land, and much of the **Council’s strategy for industrial intensification** appears to be based on the introduction of other uses in SIL. Policy LP34 Part B4 seeks to allow SME office accommodation and research and development uses on upper floors in the BDTQ. The Mayor considers that rather than intensifying and reinforcing the SIL designation, the introduction of such uses is incompatible with industrial uses and likely to weaken the operational function of the SIL and further restrict opportunities to meet future industrial needs. While there is a proviso in part B4 that the “use does not erode the effective operation of the industrial function of the SIL or LSIA” this is not sufficient to protect from the impact that such co-location would inevitably have on functioning of B8 and heavier uses within the SIL. Upper floors need to have uses that are in line with London Plan Policy E4A, with implementation of the agent of change principle also being key - so that they do not undermine the types of SIL uses which cause noise, dust, odours, emissions etc.

While noting LBW’s stated intention to **retain the BDTQ as SIL**, and its view set out in its consultation statement that “the BDTQ concept should reinforce the area’s SIL designation, and that any development within this location should protect and enhance the industrial character of the area rather than de-designate it”, the London Plan provides for the introduction of non-industrial uses such as offices within SIL through a plan-led or masterplanning intensification, consolidation and release approach, which would result in the de-designation of relevant parts of SIL to accommodate non-industrial uses together with provision of sufficient capacity for SIL type industrial uses. Even if the borough were to follow this route it would still need to demonstrate sufficient capacity for the sort of ‘heavy’ industrial types of use that are appropriate to SIL in this location – rather than offices that could locate anywhere). This should take into account the [Mayor’s practice note on industrial intensification and co-location through plan-led and masterplan approaches](#). This would mean the borough needing to re-provide genuine SIL-type industrial land elsewhere,

and - if there is no scope for additional industrial land within the borough - all additional requirements would need to be met via genuine intensification or substitution (in line with LP2021 E7). Within the BDTQ SIL, the proposed scale and spread of re-development for non-industrial uses including office use are of particular concern.

GLA officers are happy to work with LBW on this, and the work on the BDTQ vision refresh with consultants PRD provides an opportunity to seek greater clarity over how any industrial losses will be offset and additional needs met (particularly for heavier industrial uses and distribution) and to demonstrate how this can be viable and deliverable.

Overall, LBW need to demonstrate convincingly that there is a robust spatial strategy for industrial land that sets out where/how losses - of B8 and other heavier type uses in particular - can be offset, in addition to meeting the additional demand.

Economic Use Intensification Areas (EUIAs), Economic Use Protection Areas (EUPA's) and Focal Points of Activity

Wandsworth have a range of different employment designations. The LBW employment designations must not conflict with or undermine the London Plan's industrial designations and it would be helpful to make very clear the distinction between these designations and the London Plan SIL/LSIS designations.

In light of comments above regarding the importance of demonstrating a spatial strategy to accommodate industrial needs, and noting the policy provisions within LP35 Mixed Use Development on Economic Land, and supporting text at para 18.42 regarding the overall provision of employment land, it is also considered important to continue to explore the potential for EUIAs, EUPAs and non-designated industrial sites as well as Focal Points of Activity to accommodate potential industrial intensification.

As previously commented 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 LP2021, where this is appropriate, and where this proposes co-location, should also follow criteria in LP2021 Policy E7 D.

LBW's amendments to LP37 regarding definitions of affordable workspace to better align with Policy E3 of the LP are welcome. The distinction drawn with 'open workspace' is also noted.

Offices

Draft Policy LP33 sets out the borough's approach to the provision of new office space – promoting offices within the CAZ (i.e. the emerging Centres at Battersea Power Station and Vauxhall), and in Town and Local Centres, then in appropriate edge of centre sites allocated for offices, and lastly in Economic Use Protection Areas. This is in line with LP2021 Policy E1, the rationale is clearly explained through supporting text. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. The Mayor welcomes the explicit confirmation that this is in line with the Town Centre First approach

and notes the additional reference to the London Plan's Town Centre Network in supporting text.

Paragraph 18.12 reflects the requirement figure for offices derived from LBW's ELPS 2020 of 22,500sqm, and this is described as being the figure for the whole borough – although elsewhere including at paragraph 18.3 and in the Consultation Statement this figure is described as the need specifically for the local/sub-regional market (i.e. excluding the Vauxhall Nine Elms Battersea Opportunity Area, on the basis that most office development in this location will serve a different market). It is not clear how this relates to the London Office Policy Review 2017 composite projection for 117,600m² of office space up to 2041. This should be clarified within the 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.

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 and 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 LP40. This is in line with the LP2021 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. Part B of LP40 also includes appropriate policy tests which align with the objectives of Policy SI 15 including retaining access and ensuring no reduction to operational capacity.

The addition of the reference to wharf uses now included in Part B of Policy LP40 is welcome.

We note that paragraph 18.84 now includes a reference to the Safeguarding Directions for Wharves – although suggest that a minor change to drafting would be beneficial to avoid implying that the Direction only 'recommends' that all planning applications affecting safeguarded wharves be referred to the Mayor.

In contrast to this largely positive policy position, the Mayor is concerned about how the policy is currently being translated into the site allocations at the following safeguarded wharves:

- **Pier Wharf:** Paragraph 4.173 Site Layout implies that the safeguarded wharf may be de-designated, and in this case a mixed-use residential scheme could come forward. Based on the Safeguarded Wharves Review which finds this wharf in active use – and

noting its particularly high throughput relative to its size - the Mayor would object to this, as it would completely undermine its strategic long-term protection.

- **Kirtling Wharf / Cringle Dock:** Paragraph 5.29 should include a more specific commitment to safeguarding the wharf for the longer term, and a stronger wording would assist here – replacing ‘discussions’ [‘with relevant parties in particular the Port of London Authority...etc’] with ‘agreement of’.
- **Middle Wharf:** Paragraph 5.82 should include a commitment to the future use of the wharf for waterborne freight.

Thames Policy Area (TPA)

The Mayor notes that the Policies Map includes the precise boundary of the Thames Policy Area in line with Policy SI 14 and that VNEB and Battersea has been removed from the list of Focal Points of Activity.

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.

The Mayor questions the deletion of references to ensuring that service access including for regular maintenance, waste collection, deliveries is separated from the primary access locations and screened away from key public areas, and he would point to London Plan 2021 Policy T7 Part G which seeks safe, clean, and efficient deliveries and servicing through the provision of space for services, deliveries and storage off-street.

As noted above, the GLA is developing a number of pieces of London Plan Guidance which can be accessed at: <https://consult.london.gov.uk/hub-page/london-plan-guidance-2>. Current guidance out for consultation includes Fire Safety Guidance and a suite of Design and Characterisation Guidance which may be of use when further refining the policy and development of any future guidance.

Tall Buildings

The Mayor welcomes the clear whole-borough definition of a tall building proposed within Policy LP4 Tall and Mid-Rise Buildings. This is set at 7 storeys or 21m to the top of the building, which derives from the Urban Design Study (2021). This accords with LP2021 Policy D9. He further welcomes the clear approach regarding the specific locations of such tall buildings, being those set out on in designated zones (clearly indicated on maps in an appendix to the plan) with a clear policy that tall buildings outside of these areas will not be acceptable – and that within these zones proposals need to meet the specified criteria.

The Mayor also notes the additional policy approach of defining ‘mid-rise’ buildings of 5 storeys (or 15 metres) which will provide welcome clarity.

Appendix 2 sets out clear appropriate heights in metres and storeys – expressed as a range, using a heat-map style visualisation to express appropriate heights within a range. This is clear and is supported.

The Mayor also commends LBW for its new policy provision at B6 of Policy LP4, which responds to previous comments regarding provisions to preserve the Outstanding Universal Value (OUV) of the Westminster World Heritage Site (WWHS). This requires development proposals which affect the setting and approaches of the WWHS to address all parts of the criteria set within part B of Policy LP3 which creates a clearer framework for proposals to demonstrate that they preserve the Outstanding Universal Value of the Westminster World Heritage Site.

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 LP2021.

Draft Plan Policy LP3, and the new addition of part B is particularly welcomed. This new provision responds to previous comments and sets out a policy approach for those applications which may affect the setting and approaches of the WWHS. It details how development proposals should demonstrate that they will conserve, promote, actively protect and interpret the OUV of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.

As noted in supporting text at paragraph 14.25 LBW is a stakeholder borough along with other adjacent boroughs in protecting and, where possible, enhancing the Outstanding Universal Value of the Westminster World Heritage Site and its setting, although it is not made explicit whether LBW is part of the WHS Steering Group that contributes to the management of the site – which could usefully be clarified.

Evening and night-time economy

The Mayor welcomes reference to his Night-Time Economy Classifications and notes that while reference has been made to Clapham Junction which has an NT2 classification, Vauxhall (which also has an NT2 classification) does not appear to have had similar references included.

Air quality

The Mayor notes the additional references to updated dates of the borough's Air Quality Action Plan (AQAP) in the supporting text, (and that the AQAP sets out the Air Quality Focus Areas. LBW may find recently published consultation drafts of London Planning Guidance on Air Quality Neutral and Air Quality Positive which may support the borough in its promotion of air quality neutral development. These can be found here: <https://consult.london.gov.uk/air-quality-neutral>.

Urban greening

The Mayor welcomes Wandsworth's decision to follow the urban greening factor approach as set out in Policy G5 of the LP2021, and notes the future commitment to a future review.

Clapham Junction Opportunity Area

The policies map changes document now clearly designates the boundary of the Clapham Junction OA, and this is also shown in the Clapham Junction and Winstanley/York Road Regeneration Area Map 6.1. The indicative growth figures set out in Table 2.1 LP2021 have also been referenced in para 6.19 of the supporting text to the Clapham Junction and York Road/Winstanley Regeneration Area – and the comment that the indicative growth figures are expected to be exceeded due to the inclusion of the wider Winstanley/York Road area is noted.

Transport

The Mayor welcomes the focus on the need to manage traffic and provide good public transport connectivity, as well as support active travel and the support for the 15-minute neighbourhood. He welcomes the references to Healthy Streets, Vision Zero road safety objective and active travel. The Mayor's [Sustainable Transport, Walking and Cycling LPG](#) may support the borough further in its efforts to identify walking and cycling networks, and any gaps and potential improvements.

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 ongoing preparation of the Wandsworth Local Plan and we look forward to continuing to work with you to ensure it aligns with the London Plan 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 Nina Miles at nina.miles@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, DLUHC



ANNEX 1 – Transport for London Representation

Transport for London
City Planning
5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

28/02/2022

Dear Sir/Madam,

Consultation on the Publication version 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 publication version of the Wandsworth Local Plan. We welcome the positive changes that you have made to the Local Plan to take account of our response to the pre-publication (Reg. 18) version. This response provides an updated set of comments reflecting the changes made to the Local Plan.

The London Plan was published in March 2021 and now forms part of Wandsworth's Development Plan. Local Plan policies and site allocations 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. We welcome added references to the Vision Zero road safety objective. However, as stated previously, 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. The mode split target of 82 per cent of trips to be made by public transport or active travel by 2041 could be made more prominent by including it in policy LP49.

We welcome clarification that car free residential development will be required in areas of PTAL 4 or above, although it would be helpful to confirm that this extends to all parts of the Clapham Junction and Vauxhall, Nine Elms and Battersea Opportunity Areas to ensure conformity with London Plan T6.1. The new paragraph, suggesting that there may be amended parking standards for key workers is not considered to be evidence-based, and is not consistent with London Plan parking policies so should be removed.

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. Alongside our response to the Reg. 18 consultation, updates have been provided which take into account changes to the Reg. 19 version of the Local Plan.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Josephine Vos', with a stylized flourish at the end.

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 – Reg. 18	Reg. 19 update
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>	<p>We welcome confirmation that ‘Development in the area of the Wandsworth Gyratory will be required to provide funding, land or complementary measures to support the implementation and maximise the benefits of the project.’</p>

WT1	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.	The implementation date of the gyratory scheme should be updated to 2025 in paragraph 4.19. We welcome the amended wording in paragraph 4.20.
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.	Paragraph 4.40 should state that vehicle access and servicing should be from Smugglers Way rather than Armoury Way.
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 /WT1 3	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.	
WT14 /WT1 5/WT 17	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.</p> <p>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</p>	<p>References to the Northern line extension should be updated to reflect its opening in September 2021. Although references to car free development for site allocations have been removed, LP51 must include a requirement for car free development within Opportunity Areas including Vauxhall, Nine Elms and Battersea as well as areas of PTAL 4 and above to ensure conformity with London Plan Policy T6.1 (see comment under LP51 below).</p>
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		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.	
	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.	

<p>NE6/ NE7/ NE8</p>	<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</p>	<p>We reiterate our support for the requirement to retain and protect Battersea bus garage.</p>
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		<p>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 road space and financial contributions towards delivery of the Nine Elms Corridor proposal or along Queenstown Road.</p>	
	NE10	<p>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.</p>	
	NE12	<p>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.</p>	
	NE13	<p>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.</p>	

<p>Clapham Junction</p>	<p>PM4</p>	<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>	<p>Although references to car free development for site allocations have been removed, LP51 must include a requirement for car free development within Opportunity Areas including Clapham Junction as well as areas of PTAL 4 and above to ensure conformity with London Plan Policy T6.1 (see comment under LP51 below). We welcome changes to the plans to amend references to Crossrail safeguarding.</p>
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	CJ1	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.	
	CJ2	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. TfL welcomes references to Crossrail 2. A project update is provided above. 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. 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.	

	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. TfL welcomes references to Crossrail 2 works sites. A project update is provided above. 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. 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>	<p>We welcome the references to engagement with TfL.</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. 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. 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 changes to the Crossrail 2 references.</p>

	CJ5	Those parts of the site that fall within the Opportunity Area or have a high PTAL should be car free. 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.	We would welcome specific reference to retention of bus standing and turning and implementing the York Road Corridor Study.
Putney	PM5	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. 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.	We welcome the support for repurposing of Putney Exchange car park for meanwhile leisure, retail, creative and cultural uses. We also welcome proposals to improve access for pedestrians and cyclists including at crossings and to prioritise buses over other motor vehicles to enhance bus journey times. We encourage early dialogue with TfL to discuss potential measures affecting Upper Richmond Road which forms part of the TLRN and measures that are designed to provide greater bus priority. Any proposals affecting the taxi rank should be discussed with TfL Taxis and Private Hire.

<p>PUT1</p>	<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>	<p>We reiterate support for providing bus terminating and standing including drivers' facilities and concern that car parking is not justified in an area with high PTAL</p>
<p>PUT2 /PUT 3/ PUT4 /PUT 5/ PUT6</p>	<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>	<p>We reiterate the point about existing parking not being replaced as part of any redevelopment to ensure conformity with London Plan Policy T6L</p>

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>	<p>We reiterate our support for bus standing facilities, improvements to infrastructure for cyclists and widened pavements.</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>	<p>We reiterate our support for contributions towards bus service improvements and provision of bus terminating and standing including drivers' facilities. We welcome removal of the suggested provision of car parking.</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>	<p>We welcome revised wording which encourages active travel and public transport and stating that car parking must achieve a balance between meeting essential needs and promoting modal shift away from the car.</p>

	TO3	Any development should be car free and existing parking removed. Care will need to be taken with access to minimise the impact on bus stops/stands.	We reiterate our previous comment. Existing parking should not be re-provided as part of any redevelopment to ensure conformity with London Plan Policy T6L
Roehampton	PM7	TfL welcomes the proposals to encourage a modal shift to walking and cycling, including the creation of new pedestrian and cycle connections. TfL also welcomes proposals to improve bus stops by relocating them in the main carriageway	We are concerned that the wording of C6 has been altered and no longer refers to relocating bus stops in the main carriageway. We would support a reversion to the original Reg. 18 wording.
	RO1	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.	We welcome the reference to bus service enhancements to Barnes and Putney stations. We note the new requirement to relocate the bus stands on Danebury Avenue adjacent to Downshire Field. Any relocation will need to be discussed and agreed with TfL London Buses and should provide sufficient space and drivers' facilities.
	RO3	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.	We welcome revised wording which encourages active travel and public transport and stating that car parking must achieve a balance between meeting essential needs and promoting modal shift away from the car.

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>	We reiterate our support for specific measures and the scope to reduce car parking.
	BA1	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.	We reiterate our point that car parking should be reduced as part of any redevelopment to ensure compliance with London Plan Policy T6L.
Wands worth's Riversi de	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.	We welcome the statement that parking should not increase but this could go further and encourage the removal of any surplus or underused spaces.

	RIV12 /OUT 4	The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.	We reiterate our point that overall car parking should not be re-provided at previous levels to ensure compliance with London Plan Policy T6L.
Sites outside designa ted sub- areas	OUT3	We welcome the requirement for improved bus, pedestrian and cycle links and supporting bus facilities	We would welcome wording which encourages active travel and public transport and stating that car parking must achieve a balance between meeting essential needs and promoting modal shift away from the car in line with other healthcare sites such as TO2 and RO3.
	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.	We note that this site no longer forms part of the allocations.
	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.	We note that this site no longer forms part of the allocations.
	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.	The wording appears to support expansion of parking and it would be useful to revise wording in line with other healthcare sites such as TO2, RO3 and OUT3.

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>	<p>We welcome the emphasis on providing high quality and safe access for pedestrians and cyclists.</p>
	LP7		<p>In part D there should be greater encouragement given to residential development which involves the replacement of parking or garages consistent with Policy H1 of the London Plan.</p>
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>	<p>We reiterate the point about acknowledging the potential contribution of reduced car use to achieving the policy objectives.</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>	<p>We welcome the added reference to the Healthy Streets Approach.</p>

Buildin g a Strong Econo my	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>	

<p>Sustainable Transport</p>	<p>LP51/ LP49</p>	<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>	<p>We reiterate the point that it would be helpful to include the target for mode shift and that development proposals should demonstrate how they are contributing towards achieving the target.</p> <p>We welcome amended wording in 20.9 and the reference to Vision Zero in 20.17.</p>
	<p>LP52/ LP50</p>	<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>	<p>We welcome reference to mitigation requirements.</p>

<p>LP53/ LP51</p>	<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</p>	<p>We welcome the reference to London Cycling Design Standards in paragraph 20.29 and removal of the suggestion that cycle hire provision could substitute for cycle parking. However, we support contributions towards improved cycle hire provision where appropriate. We welcome clarification that A2 refers to residential parking although we suggest that 'is provided' could be omitted to allow for car free development. It is not clear why the final sentence of A2 refers to policy LP1 or what purpose this serves. We welcome clarification in A3 that London Plan retail parking standards would be applied. We welcome the amended wording in supporting paragraph 20.33 on retail parking. We have concerns about new paragraph 20.36 which states that 'The Council supports the provision of car parking spaces for key workers within new developments...'</p> <p>Reference is made to using the Mayor of London's list of key workers. It should be stressed that the list of key workers (which has now been published) is purely to guide the allocation of intermediate housing and is not intended to be used to influence parking policies. We strongly</p>
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	<p>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 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.</p>	<p>recommend that this paragraph is deleted because such a wide definition of key workers would lead to exemptions and could undermine implementation of London Plan parking policies raising potential issues of conformity. We also have questions about what evidence is being used to underpin this policy.</p>
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	<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>	<p>We welcome clarification that car free development is required in areas of PTAL 4 or above. However, to ensure conformity with London Plan policy T6, the requirement for car free residential development should be extended to all parts of the designated Opportunity Areas of Vauxhall Nine Elms Battersea (VNEB) and Clapham Junction. In our response to the Reg. 18 version we asked for this to be clarified for relevant sites in Vauxhall Nine Elms Battersea and Clapham Junction Opportunity Areas, but it should be included here in the policy wording to avoid confusion, particularly now that car free requirements have been removed from specific sites. The wording of paragraph 20.34 needs to reflect the car free requirement for offices on all sites. We welcome the removal of references to proximity to public transport and clarification that a TA does not need to demonstrate a case for car free development. We encourage you to support low car development in lower PTAL areas with good connectivity and active travel links. We welcome clarification regarding parking permits for existing occupiers.</p>
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	<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>	<p>We welcome the statement in paragraph 20.28 that the absence of a CPZ is not justification for providing additional car parking. We also welcome the reference to London Plan Policy T7 in paragraph 20.29.</p>
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<p>LP54</p>	<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 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 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 a 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 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</p>	<p>We note that a generic reference to highway improvement schemes has been added to the list of transport infrastructure projects supported by the borough. To avoid confusion, it would be better to refer to Wandsworth Gyrotory specifically. Support for highway improvement schemes that increase capacity for general traffic would be contrary to the MTS and London Plan.</p> <p>We note that reference to a further extension of the Northern line beyond Battersea to Clapham Junction has been removed.</p>
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	<p>does not feature in the list of strategic transport schemes in Table 10.1 of the London Plan. As such, it would be unlikely to go ahead within the Local Plan timeframe.</p>	
	<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>	<p>We reiterate comments about the need for the text on safeguarding to more closely follow London Plan Policy T3, and to refer to consultation with TfL. It is not clear why section A2 from the Reg. 18 version on safeguarding of land for future transport has been removed as this may jeopardise our ability to secure land needed for expansion of transport services. We also repeat comments about the relevance of bullet points 1 – 4 to part B. There appears to be something missing from the text on riverside routes, particularly now that part C has been removed.</p>