

Wandsworth Council - Towards A New London Plan Consultation Response

Consultation Question Point		Draft Response	
Introduction			
1.1 What is the London Plan?		No response required	
1.2 What years will the new London Plan cover?		<p>The Council supports the principle that the new London Plan should set a long-term strategy that plans positively for the major infrastructure needed to achieve the Mayor’s growth ambitions. The Council has no specific observations to make over the proposed plan period but acknowledges that the London Plan will need to be reviewed at least every five years, in any case.</p> <p>The Council notes that the document suggests that housing targets will be set for a ten year period from 2026/27 but acknowledges that many of the measures needed to increase housing supply commensurate with the Mayor’s ambitions will take longer than 10 years to put in place. The Council supports the general principle of the Mayor utilising the new London Plan to establish new housing targets (notwithstanding more detailed observations made elsewhere). The Council would observe that housing targets being set for a ten year period from the year the London Plan is published has a direct, practical bearing on the preparation of Local Plans which follow the new London Plan, in that, in practice, many Local Plans will reach the point of adoption with fewer than 10 years of their target left. This is an observable challenge at present, with only around 4 years of the 2021 London Plan’s housing target period remaining and any indication of new housing targets through the new London Plan still at least 12 months away. The Council would therefore suggest that the new London Plan should provide clear direction as to how Local Plans should consider or address housing targets beyond the expiry of any ten year period (as the 2021 London Plan does) or whether, in liaison with individual Boroughs, it is appropriate or helpful to set housing targets for a period longer than ten years.</p>	
1.3 How many homes will it plan for?		<p>The Council notes and supports the commitments with national policy to significantly increase the supply of new housing nationally in light of the national housing crisis and an acute shortage of affordable housing. The Council supports the principle of the new London Plan taking a positive and proactive approach to delivering new housing but wishes to emphasise, as it has elsewhere in this response, that the new London Plan must strike the right balance between local needs, opportunities and constraints, and focus on the types of growth most critically needed, including genuinely affordable housing. Specifically, the new London Plan should not seek to drive growth through an erosion of standards, or by unbalancing communities by foregoing critical infrastructure or harming the balance of wider land uses, including land for community uses, jobs, recreation and biodiversity.</p> <p>The Council also supports the recognition within the consultation document that the principle of using Borough-level housing targets based on an understanding of where homes can be built, rather than necessarily where the need for those homes arises, allows London to better plan where new development happens.</p> <p>The Council notes that changes to national planning policy made in December 2024 included a change to the standard method for calculating local housing need. As recognised in the consultation document, this results in a pan-London housing need figure of c.88,000 homes per year (compared to the previous London Plan housing requirement at c.52,000 homes per year and average delivery rates of c.35,000 homes per year). Overall, the Council supports the principle of the new London Plan setting out to meet as much of London’s housing need as possible, provided that the London Plan’s strategy maximises the supply of genuinely affordable housing, secures the delivery of a balance of other necessary land uses and infrastructure, supports good growth principles and does not compromise the fundamental objectives of the London Plan and Borough Local Plans. However, the Council would emphasise that it is vital that the new London Plan balances the objective of meeting London’s housing need with these wider fundamental objectives, including in how it looks to evidence and establish new Borough-level housing targets. It is therefore critical that these housing targets are informed by a comprehensive and robust evidence base which objectively considers the capacity of London and individual Boroughs to deliver housing. In this respect, the process through which housing targets are established should not simply be an exercise in</p>	

	<p>apportioning the 88,000 figure but rather a process guided by a genuine understanding of local capacity, opportunity and constraints, informed by meaningful collaboration with Boroughs, industry and communities. At this early stage of the new London Plan process, there is limited evidence available as to how capacity, opportunity and constraints will be explored and examined, albeit the Council notes that the GLA are leading on the preparation of a new London-wide Green Belt Review. The Council welcomes the opportunity to work with the Mayor as this evidence base develops.</p>
1.4 Viability and Delivery	<p>The Council notes that there are a range of challenges currently affecting housing delivery in London but supports the Mayor’s suggestion that these market conditions are improving, and that London has a proven track record of being a very adaptable and resilient city. As evidence for this, the Council would point to a number of recent planning applications where it has been able to successfully negotiate affordable housing requirements in excess of the London Plan requirement, despite short-term unfavourable market conditions. These examples are set out and analysed further in the Housing Background Paper submitted alongside the Council’s Local Plan Partial Review.</p> <p>The Council acknowledges that the content of the new London Plan, as with Local Plans, will need to strike an appropriate balance between ambition and deliverability. Nevertheless, the Council would encourage the Mayor to avoid diluting or otherwise removing ambition from policies to accommodate short-term market conditions when the new London Plan itself is intended to be a long-term policy document.</p> <p>The Council is particularly interested to understand how the following statement could work in practice “<i>Some policy requirements may be phased so they start to apply at a later date or, for example, when economic conditions or technologies improve</i>”. The Council considers it would be preferable to have an approach in place within the new London Plan whereby the policy thresholds or requirements could be flexed as economic conditions improve, such as an affordable housing threshold that could be phased over time, or reassessed at intervals as economic conditions improve, as opposed to reducing the overall ambition or requirements within policies. Our key concern is that if a pessimistic approach to policies, including affordable housing policies, is taken as part of the emerging London Plan to accommodate short-term market conditions, this approach may then remain in place for the entirety of the London Plan period as economic conditions improve, missing out on potential opportunities for delivering higher levels of affordable housing in the future.</p> <p>The Council does welcome the consideration of balance within the London Plan and taking into account quality of homes, climate commitments, health, wellbeing and inclusion which are all key considerations, a balanced approach within the London Plan will then enable LPAs to focus on their priorities to their communities which can then be defined more specifically within their Local Plans.</p>
1.5 What is this document about?	<p>The Council supports the general principle of the Mayor reviewing London Plan policies to consider whether it is possible to target policies better or streamline how they are applied to reduce costs and speed up the planning process. However, the Council considers it important that this exercise is targeted and does not result in policy requirements being weakened or removed where this would undermine the wider objectives of the London Plan, Local Plans or national planning system.</p> <p>It is also important that the relationship between the new London Plan and proposed National Development Management Policies is appropriately explored and reconciled. Whilst the Council considers it important that the Mayor and individual Boroughs remain empowered to develop local policy frameworks which reflect the specific characteristics, needs and ambitions of local areas, policies within the new London Plan should generally seek to avoid duplication or conflict with National Development Management Policies to assist the preparation of Local Plans and the implementation of policy frameworks as a whole. When available, the Council would value further information and opportunities to shape the new London Plan on this issue.</p>
1.6 Legal and Procedural Requirements	<i>No response required</i>
1.7 Integrated Impact Assessment	<p>The Council supports the preparation of the new London Plan being informed by a comprehensive Integrated Impact Assessment which incorporates Sustainability Appraisal, Equalities Impact Assessment and Health Impact Assessment. The Council notes that an IIA scoping report is proposed for publication later this year. When available, the Council would value further information and opportunities to shape the new London Plan on this issue.</p>

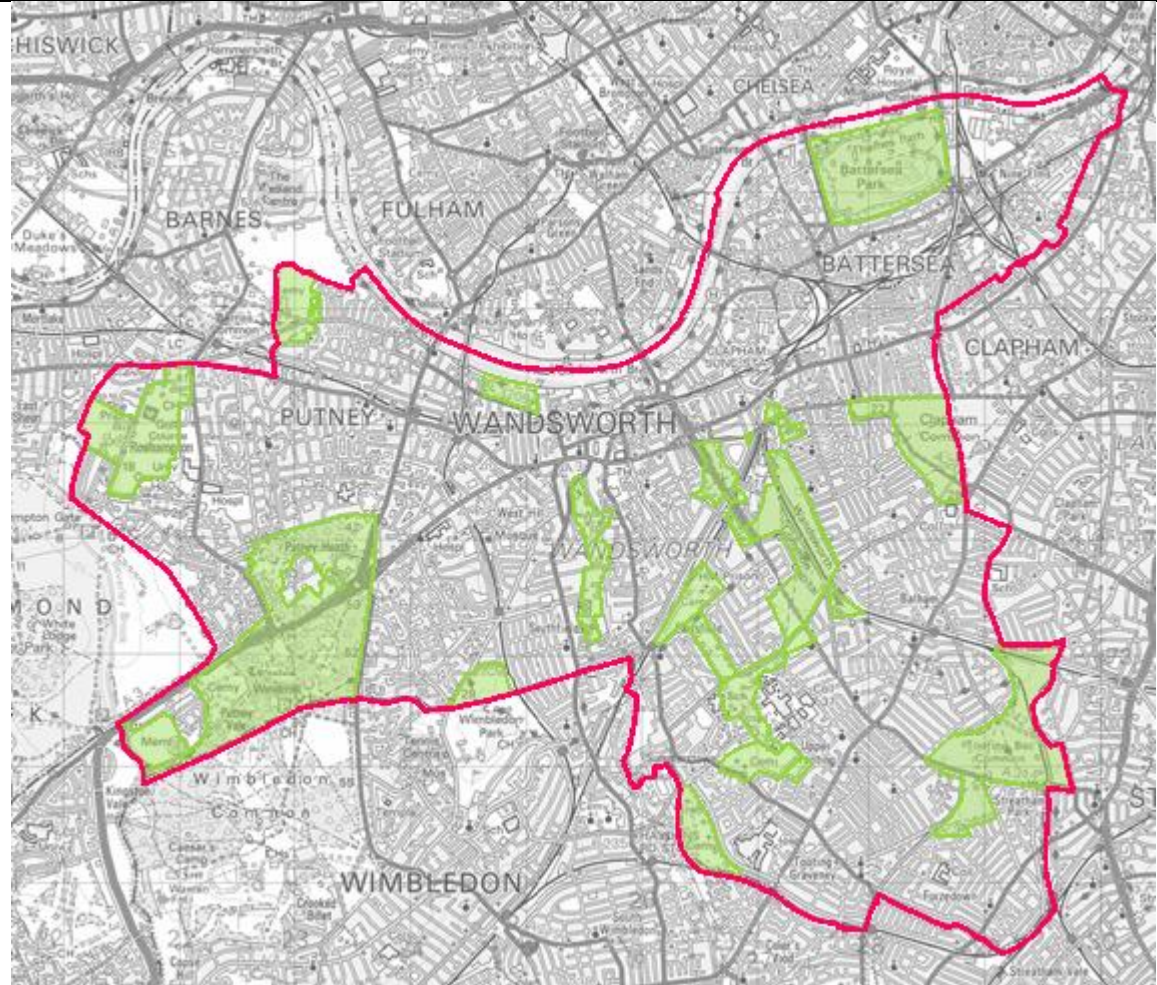
1.8 Habitat Regulations Assessment	The Council supports the preparation of the new London Plan being informed by a robust Habitat Regulations Assessment (HRA) and would value further information and opportunities to shape the new London Plan on this issue.
1.9 Beyond London	<p>The Council supports the principle of the London Plan taking a positive and proactive approach to addressing strategic cross-boundary issues which permeate beyond the administrative boundary of London.</p> <p>The Council notes and broadly supports the principle of rolling out strategic planning frameworks across wider areas as a mechanism for positively addressing cross-boundary (Duty to Co-operate) issues in a way that the current planning system often struggles to achieve. At this current time, however, it is recognised that Local Government Re-Organisation is planned for many of the two-tier areas surrounding London, and there is likely to be an extended period of flux before which these areas can meaningfully begin preparing strategic planning frameworks. Regardless of this period of change, the Council encourages the Mayor to ensure that the preparation of the new London Plan is informed by meaningful and constructive collaboration with both London Boroughs and adjacent Boroughs and that strategic and cross-boundary issues are addressed by the new London Plan and not deferred.</p> <p>Specifically, the London Plan will need to positively engage the wider South East on issues such as spatial strategy and land use, infrastructure and environmental opportunities. This should critically include ensuring that growth strategies complement rather than compete with one another, and that the strategic infrastructure that growth in London and the wider South East requires is properly planned for, co-ordinated and delivered. This would include, as an example, continuing to promote a long-term ambition for Crossrail 2. Co-operation beyond London should also involve developing a sound long-term land use strategy which balances the need to protect London's strategic economic land with identifying the optimum location for new economic infrastructure, including for example ensuring land-intensive economic uses which require access to the strategic road network are guided to the most appropriate locations, which in practice may be in areas adjacent to London.</p>
1.10 Good Growth Objectives	The Council broadly supports the Good Growth objectives contained in the current London Plan. The Council notes that the Mayor has highlighted that the new London Plan will include the "critical priorities" of delivering the homes Londoners need and growing a good economy. The Council supports these priorities but would emphasise that they need to be set within a framework which includes the wider Good Growth objectives to ensure development is socially, economically and environmentally sustainable. The London Plan, and Borough Local Plans, should be empowered to ensure that the growth that comes forward is of the right type and right location to meet local needs (including for genuinely affordable housing), supports the wider vitality and health of local communities, and helps to tackle the climate crisis. The Council would encourage the Mayor to avoid any suggestion within the new London Plan that the need to deliver homes and grow the economy are to be prioritised over and above the wider Good Growth objectives. To do so risks the erosion of standards and undermining of the plan-led system. Instead, the new London Plan should ensure that the prioritisation of delivering homes and growing the economy are set within the context of a sound and sustainable strategy that addresses the wider objectives of the London Plan and individual Borough Local Plans.
1.11 The Key Diagram	<p>The Council notes Figure 1.2 indicating the progress made in achieving elements of the London Plan's Key Diagram. The Council has made specific comments regarding specific elements of the key diagram, including the status of Opportunity Areas, elsewhere in its response.</p> <p>The Council supports the recognition made within the text that extensions and upgrades to the public transport network will be critical to delivering sustainable growth. In this respect, the Council supports the continued recognition of Crossrail 2 within the key diagram and elsewhere in the consultation document but notes it is not featured in the list of key initial priorities within this section. The Council considers that the London Plan should align with the recently published London Growth Plan which prioritises the delivery of Crossrail 2 to unlock new homes and growth. The Council would value further co-operation to examine the strategic transport infrastructure needed to support growth as the new London Plan's spatial vision develops. In this context, the Council would also wish to highlight its intention develop its own local growth plan which will set an approach to shaping growth in their areas which provide an opportunity to do this at the local level. Consistency and co-ordination between the London Plan, London Growth Plan and local growth plans will be important to ensuring strategy and policy on achieving growth is aligned.</p>

Increasing London’s Housing Supply	
2.1 A Brownfield First Approach	<p>The Council strongly supports the principle of prioritising opportunities to plan for and deliver homes within London’s existing urban extent, including to maximise the proportion of housing delivered on brownfield land. The Council supports the recognition within this section that the new London Plan will need to ensure the quality of places and be clear about what is needed to support higher densities, however, whilst the Council recognises that increasing densities will need to be explored as part of the development of the new London Plan, it would emphasise that London’s neighbourhoods are unique and distinct, and the optimum density for a specific neighbourhood will be sensitive to its local characteristics, including, but not limited to, its prevailing character, public transport accessibility, historic character and heritage and sensitivity to change. The new London Plan’s approach to optimising densities should be informed by evidence, including Urban Design Studies, with the detail deferred to individual Boroughs to direct.</p> <p>In the context of wider policy changes suggested within the consultation document, including the Mayor’s on-going London-wide review of Green Belt, the Council would emphasise that it is important that London’s overall capacity to support greater growth is supported by a commensurate growth in the capacity and capability of the development industry, including both public or private sector. This is vital to ensure that developers retain the right economic incentives to develop urban and brownfield sites to avoid developers simply disinvesting from trickier or costlier urban or brownfield sites in favour of developing more straightforward or less costly suburban or greenfield sites.</p> <p>The Council notes that the consultation document raises the significant time it can take for decisions to be made and how this can affect the time it takes to get homes built. On the basis that decisions are often delegated to case officers which allows quicker decision making, which is emphasised by the new NPPF, speeding up the planning process could be aided by the types of schemes referred to the GLA being reassessed as part of the new London Plan. For example, the threshold for GLA referral could be updated to only incorporate much larger and more sensitive schemes (such as schemes over 500 dwellings or similar) which would aid in speeding up the process. Updating the threshold for referable applications would allow the GLA to focus on seeking benefits on only the largest strategic and most complex schemes across London and allowing quicker decisions on other smaller schemes.</p>
2.2 London’s Call for Sites – LAND4LDN	<p>The Council notes that the Mayor issued a Call for Sites (LAND4LDN) in Autumn 2024 and that Council officers have been participating in this process. The Council would emphasise the importance of ensuring that individual Boroughs have discretion over the process and outcomes associated with the Call for Sites, including any assumptions made over the suitability or capacity of sites in the context of any subsequent SHLAA process. These processes should be led with the objective of ensuring the information captured on land availability in London is as up-to-date and accurate as possible, within an assessment framework that appropriately balances policy ambitions at a local level (including to ensure the ‘policy levers’ referenced in the consultation document are those supported by individual Boroughs having regard to the Council’s full response to this consultation). In this respect, the process must be designed to ensure that the up-to-date and localised knowledge on individual site opportunities, constraints and histories held by Borough officers is favoured over any generalised or unevidenced assumptions.</p>
2.3 Opportunity Areas	<p>The Council notes that the Mayor intends to review Opportunity Area designations as part of the new London Plan. Within the consultation document, the Mayor identifies the differing characteristics of different Opportunity Areas, including in relation to their mix of uses, infrastructure requirements, timescales for delivery, local context and maturity.</p> <p>Wandsworth Borough is home to two Opportunity Areas within the current London Plan, at Vauxhall Nine Elms Battersea (VNEB) and Clapham Junction. The Council notes that the Mayor intends to update the status of VNEB to ‘maturing’, which appears logical based on the significant amount of development that has now been completed there, and to review the status of Clapham Junction with a view to removing the Opportunity Area status.</p>

	<p>The Council strongly objects to the proposal to remove the Opportunity Area status from Clapham Junction, and has made separate submissions in relation to this issue, in co-ordination with the Clapham Junction Masterplan Project Board. In short, the removal of the OA status at Clapham Junction would be regrettable for a number of reasons, most particularly because it would symbolise an apparent downgrading of the recognised importance of change and investment at Clapham Junction. This note sets out the key information relating to the case for growth at Clapham Junction that can be included in representations (either as part of the Council’s full submission or as a separate submission), with the key elements summarised below.</p> <ul style="list-style-type: none"> • Clapham Junction station is nationally important infrastructure, relied upon by millions of Londoners, visitors and workers, with more passenger interchanges than any other UK train station. It is demonstrably very different from other town centre and London locations. • There is significant capacity for both housing and economic growth at Clapham Junction (3,000-5,000+ homes and 3,000+ jobs) and forms part of a key growth corridor identified in the Mayor’s London Growth Plan and the emerging Wandsworth Growth Strategy. There are few comparables in London where there is the same potential to co-locate significant growth with multi-modal transport infrastructure which is a key tenet of Government growth policy • There is a clear need for public and private funding to solve the station’s long-term capacity constraints, and to help unlock wider growth, that requires concerted and co-ordinated public sector-led interventions to unlock. The continued recognition of the area’s potential through the Opportunity Area designation is seen as vital to ensure the area continues to be prioritised, resourced and funded to unlock the significant growth opportunities identified, to an aligned ambition and vision. • There is an existing, positive partnership of bodies working together to unlock a collective vision for Clapham Junction including through the development of a comprehensive masterplan. This partnership is indicative of the broad consensus, capacity and capability for change that exists in the area, and the positive steps being taken towards unlocking the area’s growth potential. <p>The Council has further concerns over the unclear rationale for removing the Opportunity Area (OA) status at Clapham Junction. Within the consultation document, it is suggested that the proposed de-designation of OAs may occur where “they are no longer very different from other town centre and London locations” or “where transport infrastructure schemes are now less certain or will only be delivered beyond the next decade (for example Crossrail 2)”. On the former point, the Council would raise significant concerns over any suggestion that Clapham Junction OA is more comparable to a typical town centre location than other OAs, given it is:</p> <ol style="list-style-type: none"> a) centred on the busiest interchange station in the UK served by a large number of different transport routes and lines; b) known to have capacity for thousands of new homes and jobs, as recognised by the Mayor’s London Growth Plan; c) supported by a positive partnership of public and private sector bodies (including the GLA) working together to unlock growth at Clapham Junction, including through a new comprehensive masterplan; and d) reliant on significant investment in transport infrastructure to unlock (with or without Crossrail 2). <p>Regarding Crossrail 2, it is noted that the consultation document continues to promote Crossrail 2 albeit at a delivery timescale beyond 2040. This being the case, it is important that the OAs along the Crossrail 2 corridor are not automatically discounted but rather fairly appraised for their continued potential to support the Mayor’s growth ambitions (which for Clapham Junction remain extremely significant with or without Crossrail 2) and their wider infrastructure and funding imperatives (which for Clapham Junctions includes funding of a long-term solution to the station’s well-known capacity constraints). Given the Mayor’s objective of increasing the scale of housing and economic growth across London, the Council would also question whether streamlining the number of Opportunity Areas is appropriate. The Council considers that Opportunity Area status is a positive influence on unlocking growth and funding. As such, the Council would strongly suggest that the Mayor should be looking to maximise the potential of existing Opportunity Areas and exploring new Opportunity Areas.</p>
<p>2.4 Central Activities Zone</p>	<p>The Council notes the role of the Central Activities Zone (CAZ) designation to supporting central London’s multifunctional importance for economic growth, including tourism. Within Wandsworth, only the Vauxhall Nine Elms Battersea (VNEB) area presently sits within the CAZ boundary.</p> <p>The Council supports the Mayor’s commitment to ensuring valued strategic views continue to play an important role in protecting London’s heritage. The Council notes that the Mayor will be reviewing the guidance set out in the London View Management Framework with a view to consider how the policy works in practice to ensure its impact is proportionate. Whilst the Council does not oppose reviewing guidance to ensure it remains up-to-date</p>

	<p>and fit for purpose, the Council would not support reviews of the London View Management Framework which sought to diminish the ongoing role of protected views in favour of identifying greater capacity for growth.</p> <p>The general principle of amending the role of the CAZ to promote additional residential development would be welcomed as this would allow more opportunities for housing development in areas where sites are available, dense character is already established, and which are best served by public transport.</p>
2.5 Town Centres and High Streets	<p>The Council has made more detailed comments in relation to the role of Town Centres and High Streets in its response to Section 3.3. These comments should be read alongside those provided below.</p> <p>The Council supports the general aim of increasing housing in town centres as part of a suitable mix of uses, where this can support their vitality and viability by, for example, creating a larger population of prospective shoppers and workers. In Wandsworth, high density mixed-use development is supported by the Council's Local Plan in appropriate locations. The Council would encourage the Mayor to be mindful that town and local centres and parades are vital locations for delivering essential shops, services and facilities for borough residents and that an appropriate balance should be struck so that centres remain vibrant, diverse and capable of meeting needs. In this respect, it is important that increased amounts of housing in town centres and high streets complements the provision of shops, services and facilities, rather than displacing them. The Council would therefore encourage the Mayor to ensure the new London Plan supports the retention or re-provision of commercial and community uses at ground floor levels within defined centres and strongly resists the loss of ground floor commercial or community uses unless exceptionally justified (including through evidence of long-term unsuccessful marketing).</p>
2.6 Industrial Land	<p>The Council has made more detailed comments in relation to the role of Industrial Land in its response to Section 3.4. These comments should be read alongside those provided below.</p> <p>The Council notes that the current London Plan allows the co-location of homes alongside employment or industrial uses which is intended to enable homes to come forward alongside these uses. However, the Council notes that around 18 per cent of London's industrial capacity has been lost since 2021 which is an unsustainable rate of loss.</p> <p>The Council would encourage the Mayor to ensure that the new London Plan, in seeking to identify opportunities for housing on industrial land, does not undermine the importance of maintaining a strategic reservoir of industrial land, complemented by locally important employment sites, in creating vibrant communities. The Mayor should work with the Boroughs to prepare evidence which considers the employment needs of both London and individual Boroughs and informs an appropriate strategy which continues to safeguard the most valuable industrial land for its role in supporting both the regional and local economies and providing local job opportunities. The Council is generally cautious over the prospect of "land swaps" whereby industrial land within London's urban area could be released for housing and re-provided on London's edge, for example in the Green Belt. The Council would encourage the Mayor to consider whether such a strategy risks undermining local economies by displacing jobs, unbalancing the mix of uses in local areas, and the impacts of creating a greater need for travel from inner London to outer London on local infrastructure and climate change objectives. There should also be regard for the changing nature of industry in London, especially central London, where potential for innovation, adoption of technology and increased productivity can support more intensive use of land and respond to localised clusters and markets that cannot be replicated in more suburban locations. Locations for industrial innovation are explicitly identified in the London Growth Plan and include parts of Battersea and Nine Elms.</p>
2.7 Wider Urban and Suburban London	<p>The Council would support greater clarity over the proposed approach to small sites as part of the new London Plan. In particular, whilst the Council supports the principle of the London Plan continuing to support the delivery of small sites, it is important that any use of small sites targets within the new London Plan is based on a realistic assessment of their capacity and likely deliverability, developed in close collaboration with the Boroughs.</p> <p>The Council's Local Plan provides particular support for the re-development and intensification of vacant and underused sites. The Council supports the principle of the new London Plan encouraging optimisation of under-used sites for housing or mixed uses.</p>

2.8 Other Sources of Housing Supply	The Council notes the Mayor’s intention to undertake a London-wide review of Green Belt. As Wandsworth itself contains no Green Belt land, the Council has no detailed comments to make on this section other than to restate comments made under Section 2.1 to emphasise that it is important that London’s overall capacity to support greater growth is supported by a commensurate growth in the capacity and capability of the development industry, including both public or private sector. This is vital to ensure that developers retain the right economic incentives to develop urban and brownfield sites to avoid developers simply disinvesting from trickier or costlier urban or brownfield sites in favour of developing more straightforward or less costly suburban or greenfield sites.
2.9 Beyond London’s Existing Urban Area	Please see comments made in relation to Section 2.8 above.
2.10 Large Scale Urban Extensions in the Green Belt	The Council has no comments to make on this section.
2.11 Metropolitan Open Land	<p>The Council supports the Mayor’s intention to separate the policy approach for Metropolitan Open Land (MOL) and Green Belt, recognising that the purposes and criteria for designation are different, as is their role and function. The Council strongly supports the continued protection of MOL which plays a vital role for Londoners in supporting their health and wellbeing with providing public access and recreational opportunities to open spaces (parks, playing fields, or natural landscapes for example) that can support both physical and mental well-being, as well as the strategic role the MOL serves in maintaining and enhancing connectivity of the blue and green infrastructure network which is essential in supporting biodiversity and the local environment. The MOL is also recognised as playing an important role in providing areas of resilience to climate change which are critical in supporting the delivery of policies to combat climate change.</p> <p>The Council strongly supports the protection of MOL and policy approaches that seek to enhance the MOL provision and make them more accessible to users, and seeks clarity as to whether the GLA intends to undertake a London-wide review of MOL. If the GLA intends to undertake a London-wide review of MOL, it is critical that the GLA closely collaborates with individual Boroughs to understand the role and purpose of MOL at a local level. As detailed in the map below, there is a strategic spread of MOL across the borough that connects green and blue corridors together. Many of the areas of MOL designation (such as Battersea Park, Wandsworth Common, Wimbledon Park, Totting Bec Common, Putney Heath) are subject to other protective designations due to their historical significance, open space value and environmental importance and therefore are subject to strong levels of protection and are considered to be sites that are unlikely to afford development opportunities.</p>



Notwithstanding the Council’s strong support for the continued protection of MOL, should an emerging policy on MOL within the London Plan specify exceptions or indicate where release may be appropriate, such circumstances should be very clearly set out. However, the Council considers that any release of MOL, if appropriate in exceptional circumstances, would be best assessed and achieved through the Local Plan making process, taking into account the wider evidence base and consideration of local development needs.

In relation to golf courses, the Council notes that the Mayor has identified golf courses as a potential example of where MOL covers areas that are not accessible to the wider public and/or have limited biodiversity value. The Council considers that in principle there may be some limited opportunities across London to optimise the use of redundant private golf courses if properly identified and to be used for the public good and they are of limited biodiversity value such as for housing including affordable housing or public open amenity space. Whilst the Borough only contains a small number of golf courses, many golf courses have a range of other environmental protections and the Council acknowledges that they have an important recreational role. Whilst noting the significant challenge the Mayor has in accommodating London’s housing need and the Council supporting meeting Wandsworth’s needs as much as feasibly possible given the various land capacity constraints, the Council would encourage the Mayor to ensure that any London-wide review of MOL which includes any detailed review of golf courses has full regard to the contribution open spaces play in supporting healthy and resilient communities, and is undertaken in close collaboration with individual Boroughs, who will have a more localised knowledge of their open spaces. The Council would encourage the Mayor to ensure that individual Boroughs, through their Local Plans, remain empowered to make decisions on what land is suitable for growth and what land requires protection, having regard to local needs and opportunities.

In relation to SINC’s specifically, these are areas that much valued for nature conservation, not only in relation to habitat and species protection but as providing connectivity between sites, including providing darks spaces required by some species. Any release, if appropriate in exceptional circumstances, would need to carefully scrutinise the nature and role of these sites which is best assessed and achieved through the Local Plan process.

2.12 Affordable Housing	<p>The Council agrees that the current housing crisis needs considerable attention within the London Plan. As set out within the consultation document, the insufficient supply of good quality and genuinely affordable homes is impacting Londoners and the capital in many ways. The Council’s Local Plan Partial Review has the specific objective of significantly increasing the overall supply of genuinely affordable housing, particularly social housing, within Wandsworth. The Council would encourage the Mayor to review the Housing Background Paper that the Council has prepared which provides further analysis of the implications of the current affordability crisis on social and economic outcomes.</p> <p>Local authorities cannot continue to spend the significant sums on temporary accommodation as it is not sustainable and is highly damaging to the wellbeing of households in this situation. Although the delivery of new affordable housing is a key component of the solution (as expanded upon in the Council’s response to 2.13 below), one of the main barriers to new delivery are the wider economic challenges facing Registered Providers, including the previous shortfalls in the maintenance of older housing stock. To allow Registered Providers (RPs) to be able to purchase new stock or build new stock, more needs to be done to help RPs to improve the quality of their existing stock and ease these additional financial burdens which are a significant barrier to new affordable housing development.</p> <p>In addition, the London Plan must seek to address the permitted development rights which mean the large scale loss of office space (and other uses) to residential can take place without oversight from local planning authorities, and critically in a way which does not require the provision of affordable housing even where the relevant size threshold is met. Not only does this erode important commercial space without due planning consideration, it also results in a significant opportunity cost in relation to affordable housing, representing a ‘back door’ to a planning permission that foregoes this critical public benefit. The current route to restricting this backdoor, i.e. through article 4 designations, only provides very small areas protection and historically the previous Government has sought to significantly curtail the ability for local planning authorities to use these Directions. The Council would encourage the Mayor to give this issue due consideration with a proper approach taken, similar to that which has seen the use of vacant building credit significantly restricted within London.</p>
2.13 Planning for Affordable Housing	<p>The Council agrees with the continued need for the London Plan to plan for a range of genuinely affordable tenures. However, one of the key issues constraining affordable housing delivery is the inequal treatment of affordable housing obligations when it comes to non-conventional forms of housing. As set out elsewhere in the consultation document, less onerous affordable housing requirements from non-conventional housing, combined with other less onerous policy requirements, have created an economic environment where traditional market housing (which is the greatest source of conventional affordable housing) is being displaced by more niche and more specialist forms of accommodation (which often provide restrictive forms of affordable housing). The Mayor should review the London Plan with a view to ensuring that all forms of housing contribute to delivering conventional affordable housing, with the emphasis being on the tenures most needed, including social rented housing. At present the onus to deliver affordable housing is placed solely on major developers delivering C3 housing. The Mayor should balance this requirement, securing a proportionate contribution from all small sites, student housing developments, built to rent, co-living etc to ensure we can deliver the level of affordable housing we need across London. This will also place the burden more fairly across the development industry and provide a pathway to resolving the economic environment which is seeing conventional housing being displaced.</p> <p>The Council supports the approach to embed planning obligations within land values (to ensure that public benefit is not constrained by excessive values) but is very concerned about the prospect of having an overly conservative affordable housing policy which does not take a long term view on economic cycles, rather focussing on the prevailing economic circumstances at a challenging time. It is absolutely critical that in seeking to acknowledge challenging short-term market conditions, the Mayor does not establish an unambitious or overly negative affordable housing policy which fails to maximise long-term delivery, especially considering that the emerging London Plan period (to 2050) is going to be longer plan period than previous plans and market conditions are expected to markedly improve well before the end of the plan period. To do so would only benefit landowners and developers by way of profit, and any increases in price paid for the land resulting from an overly relaxed policy burden would also impact downstream in future viability negotiations, reducing the benefit for local communities both now and in the future. The Council would instead encourage the Mayor to consider other ways in which the London Plan could balance short-term market conditions with long-term need, such as the use of review mechanisms or the operation of the Viability Tested Route (VTR), as opposed to any suggested watering down of the overall requirement or tenure expectations.</p>

	<p>It is understood that the Mayor stands by the current pan-London Fast Track Route, which, as explained through our Local Plan process, we do not fully agree with. The Council does not consider that the threshold approach as currently constructed provides a fair or balanced approach across different types of housing developments. In particular, some forms of housing such as Build to Rent, purpose-built student housing, co-living etc do not need to provide conventional affordable housing, only either Discount Market Rent or affordable student rooms, none of which caters for those in greatest need in the Borough, and all of which contributes to an imbalanced policy environment wherein non-conventional housing has become economically advantageous compared to conventional market housing. As mentioned above, this situation places too much onus on only major C3 developments to build the majority of genuinely affordable housing, which is the type most needed across the capital. The new London Plan must require all types of housing development to provide genuinely affordable housing if the strategic affordable housing target is to be achieved. The Council would encourage the Mayor to review, and embed within the new London Plan, the mechanisms proposed within the Council’s Local Plan Partial Review which seek to address this issue.</p> <p>The Council would also welcome a review of the threshold approach which seeks to allow Councils with clear evidence to alter the threshold if their evidence can demonstrate this is deliverable. Having a London wide threshold which is completely inflexible to local circumstances does not align with the aspirations of the NPPF whereby local circumstances should be taken into account in regard to policy. London is so diverse in relation to house prices, land prices, and affordable housing needs, that a more flexible approach must be considered where evidence justifies this. The Council recognises that the Mayor considers that the threshold approach as currently constructed increases the overall amount of affordable housing delivered, and that local approaches would deliver less affordable housing overall. However, this is not consistent with the fact there a number of local examples where the Council has successfully negotiated affordable housing requirements in excess of the London Plan threshold, despite challenging economic conditions across London. If the Mayor considers there to be clear evidence that local approaches deliver less affordable housing overall, this must be clearly published and available for public scrutiny. This evidence must also address why any pan-London assumptions have been preferred to local assumptions, and why any pan-London data or hypotheses have been preferred to local data or specific examples. When reviewing the London Plan, the Council would encourage the Mayor to review the Whole Plan Viability Assessment which has supported the Council’s Local Plan Partial Review. In general, the Council considers that failing to accommodate economic capacity in local areas to achieve greater levels of affordable housing undermines the delivery of affordable housing and the achievement of the Mayor’s strategic target.</p> <p>In relation to tenure, and specifically the proposal to place a greater emphasis on social rented housing, the Council would welcome this as social rent is our greatest and most acute need in the Borough. However, the emphasis should be on flexibility for Local Plans in relation to establishing local tenure mixes, with guidelines in place which can be flexed if sufficient evidence is provided as part of a Local Plan examination to justify a different approach. One approach to tenure does not necessarily work for all London boroughs, so the ability to consider a more evidence-based approach would be more positive, which in some Boroughs could be to require an even greater proportion of social rented housing than the London Plan aspires to deliver.</p> <p>The Council is supportive of Key Worker Living Rent as a new tenure, as expressed in the Council’s response to the Key Worker Living Rent consultation.</p>
2.14 Estate Regeneration	<p>Overall, the Council would generally welcome the approach considered for estate regeneration, however, only where there is a net increase in Social Rented housing proposed by dwelling and by habitable room . The Council would also impress upon the GLA that any Estate Regeneration projects are tenant lead as this is key to ensuring residents needs are met. It would also be beneficial if some elements of the GLA’s practice note in relation to estate regeneration are considered for the London Plan, such as the use of the Fast Track Route where certain requirements are met. It should also not necessarily be a requirement for all estate regeneration schemes to be viability tested if they are Council-led schemes and re-providing all the existing affordable housing.</p>
2.15 Build to Rent	<p>The Council would not necessarily agree with the statement that Build to Rent (BtR) provides for an intermediate need as often BtR is not affordable to many Londoners on middle incomes, and, in relation to affordable housing, is only required by the London Plan to provide Discount Market Rent (DMR). Given the acute need for social rented housing, and the fact DMR remains unaffordable to a majority of households in need of affordable housing, the Council would strongly encourage the Mayor to review this requirement as part of the new London Plan. The Council would encourage the Mayor to require BtR schemes to deliver social rented housing within a separate block, or if a separate block cannot be accommodated, to make a contribution equivalent to the value of delivering the equivalent amount of social rented housing off-site. With the prevalence of BtR schemes only</p>

	<p>increasing across London, it is vital that they deliver the types of affordable housing most needed across London to avoid creating a policy and economic environment which undermines the delivery of social rented housing by making forms of accommodation which do not deliver it relatively more viable. In Wandsworth, the existing Local Plan policy already encourages BtR to deliver social rented housing in a separate block and we have successfully achieved compliance with this requirement on a large BtR site, demonstrating this is a realistic proposal.</p> <p>The Council welcomes the statement that BtR should deliver genuinely affordable housing, but, as above, the onus must be on the provision of Social Rent. Where intermediate affordable housing is required we would support London Living Rent with Council input into relevant affordability criteria ensuring the tenure can meet local affordability requirements.</p>
2.16 Other Housing Options	<p>In relation to specialist housing, given the evolving nature of the demographic in London the key is to delivering housing that meets multiple needs and is easily adaptable. As an example, the Government recently brought in restrictions on international students bringing dependents, which among other recent changes has resulted in a decline in student numbers in many universities across London. The delivery of specialist housing can result in the creation of inflexible accommodation that is less able to adapt to changes and the needs of Londoners. A more adaptable approach to specialist housing is needed, and an emphasis on applicants needing to clearly demonstrate need in a specific area before proposals of a specialist nature can be supported.</p> <p>In terms of student housing and co-living, the Council would also support stronger definition of overconcentration when considering proposals for specialist forms of accommodation. This will allow LPAs to help create more balanced communities coming forwards which are not purely prioritising student, co-living and supported housing.</p> <p>The Council strongly supports the statement that “Sometimes, market conditions and other factors can mean that some types of housing (such as co-living) dominate new supply, at least in some areas. Sometimes, housing is aimed at a very particular part of the population (for example, students). When general housing needs are acute, this can raise questions about whether the balance is right or if planning needs to adjust it.” As stated elsewhere in the Council’s response, prevailing economic and policy conditions are contributing to an environment where non-conventional forms of accommodation, including student housing and co-living, is displacing the supply of conventional housing. Whilst the Council appreciates there is a demand for such housing, the displacement of conventional housing can be problematic for a number of reasons, including because non-conventional forms of housing do not contribute towards much needed conventional affordable housing (including, critically, social rented housing) and because non-conventional housing typically caters for a narrow range of potential occupiers which can lead to imbalanced and unmixed communities, and a significant change in the demographic profile of a neighbourhood in a relatively short period. As stated elsewhere, the Council would support the Mayor offering greater support through the new London Plan for Local Plan approaches such as that being proposed by the Council which seek to restrict the ability for non-conventional housing to displace conventional housing, and to more broadly consider, through the new London Plan, whether his policy approach in relation to affordable housing and non-conventional housing should be updated to equalise the economic incentives associated with different forms of housing and to allow local authorities to take a more sequential approach to meeting those needs which are greater or more acute (including, as above, social rented housing).</p>
2.17 Specialist and Supported Housing and Housing London’s Older Population	<p>There is a desperate need for more specialist affordable housing, with many Registered Providers not wanting to take on specialist affordable housing, plus a lack of funding available to tackle the current crisis. Temporary Accommodation for specialist housing is in very short supply, and can sometimes result in very vulnerable people being placed well away from their support network and sometimes even out of borough. More funding is needed to help support the delivery of specialist affordable housing or incentives provided to ensure specialist affordable can be delivered. With a mental health crisis in the UK and forecast increases of people with illnesses such as dementia, advocating for this type of accommodation will be very important in the new London Plan.</p> <p>Although meanwhile uses could promote this use, such as for emerging accommodation for homeless people, Councils often don't have the ways and means to allow for meanwhile uses, or the resources/storage opportunities etc to potentially tap into temporary accommodation. A way to help this could be for the GLA to have a pool of modular homes, that could be booked for a period of time by LPA's. Investing in these units when LPA's may not have the storage available can be very risky. This is where a London wide approach could be applied, however, we understand this would be outside the scope of the London Plan.</p>

2.18 Purpose-Built Student Accommodation and Other Forms of Shared Housing	<p>The Council agrees with the statement that too much of this type of accommodation can reduce the availability of general needs family housing and, if unmanaged, can alter the character of communities. The size and density of some of the new student housing schemes are a real concern for many existing residents. For example one scheme in Wandsworth is for over 800 student bedspaces, this is a high number of additional people who are transient in nature, do not necessarily have direct links to the area or invested within the local community and are only often within their accommodation for 38 weeks of the year.</p> <p>The London Plan needs to clearly set out there are different types of accommodation that can provide for students and more organically space students within the existing population and allow an element of choice within the student population to consider different routes of accommodation. For example, current needs studies are often carried out on the premise that all students could reside in PBSA, however, the PBSA model does not necessarily meet the needs of all types of students. A clearer more balanced picture of student requirements is required, which is based on realistic and sufficient local assumptions that can then be relied upon in local plan preparation and decision-making. The Council has particular concerns over how the London Plan presents a London-wide need figure which does not provide councils with the ability to critically analyse the true need for student accommodation when developing their local plans or making decisions on individual planning applications. The overall impact of this is that the ability for councils to meaningfully restrict the ability for PBSA to displace conventional housing is weakened, even where the need for conventional housing (and the conventional affordable housing it delivers) is demonstrably greater and more acute than the local need for PBSA. The Council would encourage the Mayor to consider whether the current approach to PBSA within the London Plan is adequately safeguarding the need for conventional affordable housing or whether a new approach, including setting local targets, may be more appropriate. Similarly, the current policy approach aims to focus student housing in locations which are in a high PTAL which theoretically allows students to access different campuses in other parts of London more easily. Although in theory this seems like a logical approach, in practice, this results in even more intense competition for scarce land between conventional housing and student housing on these well located sites. In many cases, the need for well-accessed locations is even greater for the permanent households displaced, who may have more limited means and need access to their place of work, access to services facilities etc. As stated elsewhere in the Council’s response, this is compounded by an economic and policy environment which means that certain non-conventional housing types, such as student housing, have become relatively more viable, are therefore able to outbid developers delivering general needs housing, and displacing and harming the supply of conventional and conventional affordable housing.</p> <p>For these reasons, the Council considers that all housing sites should be required to deliver conventional affordable housing, including social rented housing on-site, or at the very least make a contribution towards social rented housing. In the case of student accommodation, this contribution towards conventional affordable housing should be included in the London Plan as a priority before affordable student housing to ensure policy burdens are more evenly balanced and to ensure all housing sites are delivering genuinely affordable housing which there is a demonstrably greater and more acute need for. There are examples within Wandsworth where Social Rented and London Living Rent housing is being provided as part of a student housing development, showing this is realistic to deliver in practice.</p> <p>In addition, the Council does not necessarily agree that HMOs are always a ‘relatively affordable’ form of accommodation for people. HMOs can, in some cases, be of very poor quality, which can result in poorer levels of wellbeing for occupants and in some cases be associated with very costly utility bills for occupants (especially relevant if EPC ratings are very low).</p> <p>In relation to HMOs, and as previously mentioned, the Council considers that all house types should be required contribute towards Social Rented housing in light of the great and acute need for this housing. Even though the level of contribution from a HMOs is likely to be lower than from PBSA, requirements for all housing to either deliver or contribute towards genuinely affordable housing is key to delivering the housing needs for Londoners and preventing London Plan policy inadvertently creating the economic and policy conditions which mean certain forms of housing that do not best meet local needs displace those which do.</p> <p>In relation to the challenges of balancing these requirements, it would be useful for the London Plan to set out higher level strategic aims for the delivery of student accommodation, such as a focus to deliver student accommodation in line with the needs and requirements of individual boroughs. The Council consider it is essential that any additional student accommodation is directly linked to a university, as this provides clear evidence of need for the student accommodation in that location.</p>

	<p>As above, the Council agrees that all non-conventional housing types need to contribute towards conventional affordable housing provision as currently these forms of housing are being unintentionally favoured due to the lower policy burdens put upon them. In relation to PBSA, the London Plan could apply a FTR threshold but defer to individual local plans to set an appropriate mix between conventional affordable housing (in a separate block or through a financial contribution) and affordable student housing, based on local circumstances and evidence. This could include the London Plan setting upper and lower bounds, similar to how the tenure mix is included within the current London Plan. This would allow flexibility across London, including evidence to justify the tenure split, level of need required and viability. However, in light of the significant and acute need for social rented housing, the London Plan would need to clearly identify the preference that ought to be given to Social Rented housing over affordable student accommodation, as this is the tenure most needed across the capital. The Council would encourage the Mayor to review the policies within its Local Plan Partial Review, and the supporting evidence base, for ways in which the Council is seeking to address these issues.</p>
2.19 Gypsies, Travellers and Travelling Showpeople	<p>Although the need for pitches across London is fairly modest when compared with other housing requirements, high land prices and the low density nature of Gypsy and Traveller pitches make it very difficult to provide additional pitches if there is no space near existing Gypsy and Traveller sites to extend. This is especially difficult where there are multiple pressures on land within London, and in light of the presumption in national policy in favour of optimising sites effectively especially on brownfield land. In Wandsworth, there is currently no identified need for further pitches within the plan period.</p> <p>In relation to pitch requirements, we would strongly recommend the London Plan does not set targets for pitches either London wide or by borough, and that it remains the responsibility of individual boroughs to identify pitch requirements, as individual boroughs will have a far better and more local understanding of their Gypsy and Traveller community, their needs for pitches and where additional pitches can be accommodated. This is also supported by the fact that need for additional Gypsy and Traveller pitches varies significantly across London and as such the extent to which it is a strategic issue also varies.</p> <p>In relation to the transit provision, the Council considers that a London-wide target for transit pitches is unlikely to help achieve the delivery of the required pitches in practice. It would be better for the GLA to work individually with boroughs where there have been regular unauthorised traveller encampments and assess what solutions could achieve better and longer term outcomes.</p>
Growing London’s Economy	
3.1 The Central Activities Zone	<p>The Council notes the significant role that the CAZ plays in driving productivity and supporting world city functions. Much of the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area is also designated as being within the Central Activities Zone. There is no in-principle objection to sensible amendments to the CAZ boundary to, for example, exclude areas that are predominantly residential in character, but the Council would encourage the Mayor to ensure that relevant Boroughs are appropriately consulted prior to any proposals to do so.</p> <p>Battersea Power Station is identified as a ‘potential CAZ retail cluster’ in the adopted Local Plan for consistency with the current London Plan. However, in reality a large proportion of retail and leisure floorspace due to be delivered at Battersea Power Station has now been completed so the Council considers this now to be an ‘emerging’ (or even an ‘established’) CAZ retail cluster, and the classification in new London Plan should be updated accordingly to reflect the latest development status. Furthermore, the Council would encourage the Mayor to note the approach taken within the Council’s adopted Local Plan to the Vauxhall CAZ retail cluster, which the current London Plan identifies as being within 'Lambeth/Wandsworth', but which has ultimately not been reflected in the Council’s Local Plan due to the way the area has since developed.</p> <p>The Council supports the principle of the Mayor strengthening of ‘agent of change’ protections for cultural and night-time economic uses in the CAZ, subject to further consideration of specific proposals.</p>
3.2 Specialist clusters of economic activity	<p>The Council notes that the Mayor is considering whether the new London Plan should specifically identify clusters of economic activity outside of the CAZ with a view to “providing a new flexible recognition of the range of locations that support London’s economy”. While the Council recognises there may be a benefit in recognising the specialist clusters that support London’s economy, the Council would not want the identification of specialist clusters to:</p>

	<ul style="list-style-type: none">• negatively impact more mixed use industrial or business areas outside of identified clusters• lead to greater pressure for alternative (non-economic) uses on mixed use areas not within an identified specialist cluster. <p>The Council notes support for the development and evolution of new clusters, including investment in transport infrastructure. It would be useful to better understand how these clusters would be identified and what support could be provided. For example, would new clusters be based on existing smaller/developing clusters, those identified within Local Plan area strategies/site allocations or based on areas of land with the characteristics considered appropriate for creating new clusters?</p> <p>The Council would encourage the Mayor to also consider how the identification of economic clusters would translate into land use policy. For example, sometimes clusters require specialist buildings, but often sector requirements can increasingly be accommodated in flexible accommodation that can adapt to changing requirements, including business needs outside of a particular cluster/sector. In this respect, the type and nature of space required to support clusters may not always be dissimilar to the type and nature of space required to support other forms of economic use. The new London Plan should facilitate cluster development as set out in the London Growth Plan but not be so prescriptive as to hinder other forms of workspace investment.</p> <p>Wandsworth Local Plan (2023) contains 9 Area Strategies with site/clusters of site allocations within them. The Area Strategies and site allocations provide a vision for the area, including uses, building on the assessment of the area. There are some specialisms, for example:</p> <ul style="list-style-type: none">• In Wandsworth Town:<ul style="list-style-type: none">– Site allocation WT1 Armoury Way SW18: The use must result in an increase in industrial floorspace and should include workspace for SMEs in the cultural sector– Site allocation WT2 Ram Street/Armoury Way, SW18: The application also includes a Ram Brewery Cultural Strategy which sets out a requirement to nurture creative industries on site and in the immediate vicinity, as well as deliver a broad cultural and heritage programme to enable a new 'heart' in the town centre– WT8 Ferrier Street Industrial Estate, SW18: Redevelopment should provide consolidation and increases in industrial floorspace, with additional floorspace for SME businesses. The area currently provides floorspace for some food and drink businesses and adjoins Old York Road, where there are a number of specialist and independent food and drink retailers. The development of specialist floorspace for the food and drink sector will be encouraged• In Nine Elms Area Strategy:<ul style="list-style-type: none">– Site allocation NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road, SW8: A high-quality, mixed-use development would be appropriate with street frontages on to Battersea Park Road, Sleaford Street and the street adjacent to New Covent Garden Market. Suitable ground floor uses include independent shops and businesses, emphasising local makers and artisans and complimenting the incubator units being delivered as part of the neighbouring Sleaford Street site.– Battersea Design and Technology Quarter LSIA Cluster site allocations NE6 and NE7: - Industrial uses (including logistical) must be provided within ground floor units with the opportunity for industrial and office uses on upper floors. Existing industrial uses (such as the Safestore site) must be retained and protected.– Site allocation NE8 Battersea Studios, SW8: Industrial uses must be provided within the ground floor units which should be designed to accommodate a range of industrial occupiers with preference given to B8. Office and research and development accommodation to meet the needs of SMEs should be provided on the upper floors.• Tooting Area strategy:<ul style="list-style-type: none">– TO1 Market Area, Tooting High Street SW17: opportunity to create a high-quality mixed-use/retail development with new public spaces, retaining or re-providing the market stalls and Royal Mail Delivery Office and providing residential flats to upper floors. Scope to create two small public spaces inter-linked between the two markets, which could offer restaurants, cafes and bars with al fresco dining. Providing shoppers tranquil retreats from the noisy high street frontage, and also contribute to the night-time economy.• Wandsworth’s Riverside area strategy:<ul style="list-style-type: none">– RIV10 200 York Road SW11: Mixed-use development incorporating residential and commercial uses, including opportunities for affordable creative workspace.
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	<p>In Battersea, there may be the opportunity to bring together design and innovation from the Royal College of Arts, Fashion industry (eg Vivienne Westwood studio); tech and entertainment sector of the Battersea Power Station. Wandsworth’s Economic Development Office are currently researching the opportunity for this area and should be engaged further to understand the opportunity.</p>
3.3 Town centres and high streets	<p>Ensuring that high streets remain a central feature of London’s economic and civic life:</p> <p>The Council welcomes the continued support for town centres proposed. It also supports flexibility in terms of uses which are appropriate, subject to consideration of the impact of new uses.</p> <p>Additional housing in town centres is welcomed in principle and considered above (2.5).</p> <p>The Council supports the additional flexibility within the town centre network being considered, subject to development coming forward not being of a wholly inappropriate scale for the size and function of the centre. Particular care may be needed in relation to retail to prevent large developments being tagged onto small centres.</p> <p>We welcome the acknowledgement that some requirements and restrictions are necessary – relating to specific land uses and/or where concentrations of uses may occur. This is in line with the objective of increasing housing in centres.</p> <p>Flexibility in design is supported and is existing policy in the Local Plan.</p> <p>The Council considers that planning policy should be able to stipulate an active use is required where planning permission is sought, recognising that changes to the Use Classes Order has provided previously unprecedented flexibility for change of use. It may be appropriate to designate some areas as suitable for late night uses, subject to local considerations and impact on amenity. Local plans are best placed to determine if this would be beneficial and where these areas might be. In relation to permitted development rights for conversion to residential, the Council considers that an extensive and through process was undertaken to satisfy the Secretary of State that the Article 4 Directions then proposed were defined as tightly as possible. A great deal of careful work was undertaken in relation to defining boundaries. Whilst it is recognised that boundaries are not static, it is for the Local Plan based on evidence, to redefine centre boundaries.</p> <p>The Council does not wish to propose any further centres be included in the Mayor’s town centre network.</p> <p>The Council supports proposals to reactivate high street properties, where appropriate. It is noted that the High Street Auctions process is not particularly responsive to change, although valuable in areas where vacancy rates are particularly high.</p> <p>Challenges and changes to Use Class E:</p> <p>Noting comments about changes to introduce Class E, and the London Plan taking a very flexible approach to the range of businesses in town centres and high streets. There are already a wide range of alternative uses that could be accommodated within traditional office buildings within town centres. However where proposals would involve change of use outside Class E (uses cited being places of worship (F1f), health (Ee) and educational uses (F1a), nursing homes(C2)), the Council is of the view that this assessment still needs to be considered through the planning process, as it allows officers to weigh the benefits of a specific proposal alongside the need to protect the long-term supply of employment floorspace, as identified in evidence base reports undertaken to inform the Local Plan policies.</p> <p>The Council would encourage the Mayor to consider and review local evidence to inform his proposed approach to economic policies. Wandsworth Employment and Premises Study (2020) (7.7 p116) found that between 2019 and 2034, there is a net requirement for 22,500m2 of additional office floorspace. Though there is demand for an additional 27,500m2 of floorspace, the Borough has vacant floorspace which is higher than the optimal level of surplus land required to enable the efficient churn of occupiers. Approximately 5,000m2 of forecast demand can therefore be accommodated by land which is currently vacant.</p> <p>The Employment Study (2020) and the Wandsworth Local Plan (2023) identifies two types of office need:</p>

	<ul style="list-style-type: none"> • The local / sub-regional office market comprises over 80% of the borough's total office floorspace - Premises are mostly small and are primarily located in and around many of the borough's town centres (in particular Wandsworth Town Centre), along the River Thames in Focal Points, and in small clusters of economic use (identified through the designation of Economic Use Protection Areas and Economic Use Intensification Areas. Primarily providing for micro, small and medium enterprises • Regional/national/international office market: large scale, high-quality and high value modern office space which caters for businesses, to support their potential as strategic employment hubs. These are supported in the Central Activities Zone (CAZ), focused on the emerging centres at Battersea Power Station and Vauxhall. <p>The non-residential development Authority Monitoring Report monitoring of industry, employment and retail policies covering years 2022/23 and 2023/24 will be published later this year. This will provide an indication of losses and gains of different land uses.</p> <p>The Wandsworth Local Plan (2023) has policies to protect existing office space (LP33) and existing industrial land (LP34), requiring justification and evidence for change of use. Alternative town centre uses are assessed on a case by case basis in response to planning applications, which allows planning officers to consider wider impacts.</p>
3.4 Industrial land	<p>Alongside the rest of London, the borough has continued to lose industrial land, which is vital for servicing local residents, businesses and visitors, and providing opportunities for local employment. While the borough has sought to provide additional policy protection to existing industrial areas by identifying Locally Significant Industrial Area (LSIA) designations, smaller and standalone industrial sites also make an important contribution to the reservoir of industrial land. While employment policies seek to also offer protection against change of use on these sites (for example through the requirements for robust marketing evidence), due to the introduction of Class E, it is not always possible to stop light industrial/ancillary office changing to other commercial uses and/or residential under permitted development. The Borough has introduced Article 4 Directions covering town centres and designated employment sites, but these were modified by the then-Secretary of State to cover much smaller areas compared with the original Direction.</p> <p>The Borough experiences significant pressure on its industrial land to change use to residential, and where new employment floorspace is proposed as part of planning applications, it does not necessarily seek to replace the existing industrial uses, but rather provide more general class E commercial floorspace, which does not re-provide accommodation for the types of uses that would previously have occupied the sites. As a result, these uses may be pushed further out of London as they struggle to find suitable and affordable workspace.</p> <p>While the London Plan could set out strategic industrial needs for London, this may be more suited to those Boroughs where there is more land available to provide additional industrial capacity. The focus of the Council's Local Plan is on protecting existing industrial sites, and intensifying these where feasible, to meet local economic needs, due to the lack of availability of additional sites.</p> <p>The suggestion of releasing industrial sites and providing replacement capacity in other locations (for example in the green belt) is not supported due to the potential impact on availability of sites to meet business needs, service the local economy and residential populations and provide local employment opportunities. Rather than being a location to re-locate existing industrial land, it may be that such land presents greater opportunities for accommodating new, space-hungry economic uses such as data centres.</p> <p>The Council would encourage the Mayor to consider and review local evidence to inform his proposed approach to economic policies. The Employment Land and Premises Study 2020 (ELPS) identified that in Wandsworth's industrial stock fell by 14.7% between 2010 to 2019, equivalent to 65,600 sqm of industrial floorspace. The study forecasts that there will be a net requirement of 8.6 hectares of industrial and waste management land up to 2034. There are low vacancy rates of industrial land in the borough. Intensification of industrial uses in the borough's SILs and LSIA's is encouraged in order to meet the identified demand. In Wandsworth we continue to see erosion of the LSIA's, to mixed use and residential. This is particularly true in the Lydden Road LISA where appeals and prior approvals have permitted mixed uses, making it difficult to protect for industrial use.</p>

	<p>The Council strongly urges the London Plan to consider mechanisms to protect light industrial (Egiii), and limit erosion through flexible use class E. In the case of co-location or mixed use with residential, the ground floor and basement of buildings may house light industrial and B8, with residential and/or office above. The London Plan encourages developments in high PTAL areas to be car free, however the Council would encourage the Mayor to consider whether this approach focuses too heavily on the needs of residential uses rather than industrial, logistics and storage. The Council would welcome the Mayor developing further evidence regarding space requirements for commercial vehicles for industry and logistics, based on existing and projected future need. In Wandsworth, mixed use developments are often resulting in the provision of 20 minute on-street loading bays and limited or no on-site provision for commercial vehicles. Whilst there is an increase in cargo bike delivery and last mile delivery, which the Council encourages, there is limited understanding of need for provision of commercial vehicles and space required. There is concern that lack of provision for commercial vehicles, driven by residential needs and requirements for car-free development, may ‘design-out’ suitability for light industrial and storage and logistics use, which then harms the commercial viability of these uses and makes it harder to maintain an appropriate strategic reservoir of industrial land.</p> <p>The Council would encourage the Mayor to also consider whether it is appropriate to issue guidance and thresholds for appropriate rates of intensification on industrial sites. The Council has observed inconsistencies in the way developers approach intensification in a way that makes it difficult to encourage more efficient use of industrial land.</p>
3.5 London’s night-time economy	<p>Please see the Council’s wider comments within the economy chapter which also partially relate to London’s night time economy.</p> <p>The Council supports the principle of the London Plan acknowledging London’s night-time economy and including appropriate and balanced measures to support this economy. The Council itself has developed a Night-Time Strategy which it considers is a useful tool for understanding and managing night-time activity, creating a safer, more vibrant, and inclusive experience for all residents, workers, and visitors. The Council would strongly encourage the Mayor to review its Night-Time Strategy when progressing the new London Plan.</p> <p>Within the new London Plan, it may be appropriate to define clusters for late licences in centres of a certain scale, subject to consideration of wider impacts. In this context, the cumulative impact of additional night-time premises needs to be considered, not just because of the potentially detrimental impacts of such developments on in particular residential amenity, but also the impact on the high street where certain uses may not be open during the day or all day and the need to ensure balance between the vitality of these spaces at different times.</p>
3.6 Culture and creative industries	<p>The Council considers that a London-specific approach to the Agent of Change principle could be beneficial given London’s density, land use pressures, and a more complex mix of uses and functions compared to other parts of the country.</p> <p>There are no designated Creative Enterprise Zones (CEZ) within the borough, and while the Council considers that they could be useful when identifying specialist clusters of economic activity, the London Plan should also review borough’s adopted and emerging Local Plans to identify other specialist clusters of economic activity linked to cultural and creative industries.</p> <p>For example, the adopted Local Plan promotes the growth of three creative quarters in Battersea and Nine Elms (the Battersea Design and Technology Quarter, the Food and Horticultural Quarter focused around the New Covent Garden Market area, and the emerging Visual Arts Quarter towards the eastern end of district). The Area Strategies within the plan support some culture and creative industries – see section 3.2 e.g.</p> <ul style="list-style-type: none"> • Wandsworth Town area strategy: site allocations WT1, WT2; • Nine Elms area strategy: site allocations NE2 and NE8 • Tooting area strategy: site allocation SW17 • Wandsworth’s Riverside area strategy: site allocation RIV10
3.7 Visitor economy	<p>The Council has no specific objection to taking a more flexible approach to providing additional visitor accommodation in areas where there is good transport accessibility and/or in centres. However, it is important that the introduction of a more flexible approach in the new London Plan to the location of new visitor accommodation does not undermine opportunities for the delivery of conventional housing. The Council’s adopted Local Plan</p>

	<p>Policy LP46 requires proposals for new visitor accommodation to ensure that they do not compromise a site's capacity to meet the need for conventional dwellings.</p> <p>The Council shares concerns about the growth in short-term let accommodation and the impacts this can have on displacing conventional housing supply. The Council's adopted Local Plan requires new visitor accommodation to be managed appropriately as short-term accommodation (e.g. to ensure that C1 apart-hotels, which often display characteristics associated with conventional housing, do not become more of a C3 use).</p> <p>The new London Plan should consider including policy and/or guidance in relation to emerging, non-conventional types of visitor accommodation such as pod/capsule hotels, which have seen growth across London in recent years. The current London Plan does not currently have a clear mechanism in place to deal with these types of visitor accommodation, for example regarding safety and accessibility requirements.</p>
3.8 Digital infrastructure	<p>The Council recognises the strategic importance of digital infrastructure to London's economy and agrees that digital connectivity infrastructure should be integrated with broader utility planning wherever possible. The Council considers it important to avoid overconcentration of equipment and installations to support telecommunications and digital infrastructure. Initiatives for the provision of utility and digital connectivity infrastructure must be carried out in a way that is sensitive to local character and the environment.</p> <p>With regard to data centres, the Council notes that they typically offer low employment density and limited integration with other industrial and warehousing uses. The Council would be concerned about their potential impact on existing industrial stock in a borough with high demand for industrial land but severely limited supply. The practical issue of encouraging data centres within London's urban area is the risk of displacing industrial uses which provide far more employment per square metre and which rely more on access to areas of population (for workers and/or customers). The new London Plan should therefore prioritise the location of data centres in areas with more capacity for such uses where the risk of displacement is lower (including to collaborate with areas outside of London) and to explore the co-location of data centres with other compatible industrial uses where feasible to minimise displacement. Data centres also exert significant additional demand for power which can have an impact upon employment and residential uses. The capacity of and accessibility to local power networks should be a key consideration when identifying locations for data centres in order to avoid restricting development of other uses.</p>
3.9 Access to employment	<p>The Council notes the Mayor is considering a London-wide brokering arrangement. There is little justification for such an arrangement provided in the document and the most effective arrangements for the provision of employment support services across London are best considered as part of the Mayor's forthcoming Inclusive Talent Strategy. The Council would note it already has its own established and successful Work Match service to support local people to access jobs and training drawing on close collaboration with developers and an in depth understanding of local community needs. The Council would encourage the Mayor to work with Boroughs to understand how a London-wide employment brokering arrangement would co-exist with existing borough and local-based services, which are experienced and effective in delivering employment and training opportunities locally, including during construction phases. The Council also has experience of working collaboratively across neighbouring boroughs in this area and the practical requirements of putting such arrangements in place. It may equally be that the Mayor's attentions would be most useful in helping to establish job brokerage arrangements within Boroughs which currently do not benefit from them.</p>
3.10 Affordable workspace	<p>The Council supports the provision of affordable workspace to encourage broader participation in entrepreneurship and for specialist sectors and recognises that there is a demand for a greater diversity of workspaces beyond the standard office format. The Council's adopted Local Plan supports workspace that meets the needs of specialist sectors and accommodates sectors that have social value, improve educational outcomes, or provides for disadvantage groups. For example, the adopted Local Plan recognises the importance of the borough's food and drink sector which employs a high share of people within the borough for whom the redevelopment of New Covent Garden Market should aim to support. The new London Plan should encourage developers to actively engage with boroughs at pre-application stage to identify those locally significant specialist sectors that are of particular importance to the borough's local economy which would benefit from the provision of affordable workspace.</p> <p>While the Council recognises that there may be practicality or viability challenges associated with the delivery of affordable workspace in particular industrial and warehousing developments, the Council does not consider it appropriate to remove the requirement for affordable workspace in industrial developments across the whole of London. The Council's adopted Local Plan is already considered to be flexible in this regard, recognising</p>

	<p>potential challenges with affordable workspace delivery on for this type of development at paragraph 18.69, where it states that the Council may choose to disapply the policy requirement for affordable workspace for large-floorplate storage and distribution use, where it can be demonstrated that it is not practical and/or viable to do so. Financial contributions towards off-site provision have been accepted on some industrial/warehousing sites in Wandsworth.</p> <p>The Council also considers that disapplying the policy requirement for affordable workspace on all industrial sites could lead to less affordable light industrial workspace being delivered, as new Class E(g)(iii) floorspace often comes forward in conjunction with B2 and/or B8 uses. This is particularly the case for certain sectors, in particular the creative sector which is identified as a priority in the London Growth Plan.</p> <p>A coordinated approach to affordable workspace delivery could be beneficial (e.g. on large industrial estates where there are multiple landowners) however the Council considers it essential that new affordable workspace should be provided on-site in the first instance as in most cases this will have a greater economic impact and certainty of delivery. The Council’s adopted Local Plan recognises the potential for the pooling of investment towards key areas designated for economic space development or intensification, or through a co-ordinated or masterplanned approach for an area agreed by the Council.</p> <p>The Council considers that requiring a more consistent approach to affordable workspace policy across London risks being ineffective as it could fail to consider local circumstances and undermine adopted and/or emerging policy approaches in specific boroughs that are supported by evidence. For example, the rate of discount required for workspace to be genuinely affordable can vary significantly both within and between boroughs and a London-wide approach could therefore disadvantage those Councils who can demonstrate a higher rate of discount is achievable within their own Borough. However, there is scope for greater consistency of approach and sharing of best practice to ensure a more streamlined approach whilst respecting local characteristics. The Council is already reviewing affordable workspace policies in other boroughs in this regard and would welcome a collaborative approach between boroughs and the GLA with regards to the London Plan policies in this area.</p>
London’s capacity for growth and design quality	
4.1 Building height and scale	<p>The Council recognises that, in order to address his ambition to significantly increase the amount of housing delivered, the Mayor will be looking to review appropriate building heights and scale across London as part of the new London Plan. It is agreed that the density in London is generally low compared to many European cities, largely due to the development process following the construction of railways.</p> <p>The Council supports the principle of small site development and has developed mid-rise zones within their Local Plans which support this and allow gentle densification of certain areas.</p> <p>The Council would express some reservation over the Mayor’s suggestion that minimum building heights could be set across London, given London’s neighbourhoods, character and capacity to accommodate height, vary significantly both within Boroughs but particularly across different parts of London. A minimum height threshold that applies across London, even with an exemption for conservation areas, risks being a very blunt tool with unforeseen consequences at a neighbourhood-scale. The Council would therefore encourage the Mayor to consider ways in which this principle could be captured within a more precise mechanism, for example by expressing a general indication within the London Plan, with responsibility for identifying minimum height thresholds set within Borough Local Plans on the basis of detailed urban design and heritage analysis. Whilst this could also be captured within the Mayor’s suggested London-wide small site design code, the Council would again be concerned over the ability for a London-wide design code to address London’s diversity of character without requiring that code to be substantially vague or open-ended, or else risk a proliferation of development which meets the requirements of the code but is out of keeping with local character. This would similarly be an area where the Mayor may wish to consider establishing broad principles and a general direction at the London Plan scale, with responsibility for localisation deferred to Borough Local Plans, on the basis of detailed urban design and heritage analysis.</p>

4.2 Tall Buildings	<p>In relation to tall buildings, the Council notes that the current London Plan requires boroughs to identify areas that may be suitable for tall buildings. The Council's Local Plan therefore contains a number of 'tall building zones' which were informed by a detailed Urban Design Study.</p> <p>The Council wishes to express concern over the prospect of designating tall building zones becoming the responsibility of the London Plan. It is considered that tall building clusters should only be identified in the London Plan where they relate to Opportunity Areas. Other clusters and tall building locations should be identified in Local Plans, based on robust evidence base as set out in comments in 4.1.</p> <p>As included in comments elsewhere in this section, the Council would have concern over the ability for a London-wide assessment of urban design capacity to meaningfully address local character and sensitivity. A London-wide approach, unless informed by an incredibly detailed and involved study, would inevitably require some degree of broad brush analysis, which would increase the prospect of tall buildings being identified in areas which individual Boroughs would not consider suitable. The Council would instead encourage the Mayor to strengthen the expectations within the London Plan around the role of individual Boroughs in identifying tall building zones and to positively advocate for approaches, such as that taken by the Borough, whereby a detailed but local Urban Design Study has directly informed the development of relevant tall building policies within a Local Plan.</p> <p>It is also considered that the current benchmark for defining a tall building at 7 storeys/21 metres is appropriate and there are concerns that changes to this could impact on the local plans already drafted and adopted which take this into account. This could require re-drafting of relatively newly adopted local plans when the benchmark appears sound. Instead, the London Plan could introduce the concept of mid-rise buildings as per the Wandsworth Local Plan.</p> <p>The Council would encourage the Mayor to provide greater clarity over the proposal that the London Plan could be clearer about how planning applications for tall buildings should be assessed outside of tall building zones. In particular, the Council would be keen to avoid a scenario whereby the London Plan creates a clear route for developments to circumvent the requirements of evidence-based tall building zones identified in Local Plans.</p> <p>The Council would be cautious over any proposal to remove direction from the London Plan over individual Boroughs identifying tall building zones. The Council considers that, on balance, the identification of tall building zones within Local Plans creates a stronger plan-led approach to strategic development across London and establishes clear expectations for communities, developers and infrastructure providers. This would continue to allow for Local Plan policies to set out the relevant justifications needed to allow for height / densities in appropriate locations locally, to optimise the use of land to respond to the delivery of much needed housing and affordable housing.</p>
4.3 Supporting a denser London linked to transport connectivity	<p>The Council supports the broad principle of locations with higher public transport accessibility being more sustainable locations for development, subject to wider comments made throughout this response.</p> <p>In relation to the reference to Crossrail 2, the Council would support greater clarity from the Mayor over the role of Crossrail 2 within the new London Plan window. In particular, the Council would highlight inconsistencies between the diminished role that Crossrail 2 is expected to play in support growth within the Opportunity Area section with the continued role it is identified as playing in supporting a 'denser London linked to transport connectivity in this section'. The emerging London Plan appears less to give less weight to Crossrail 2 as a priority for unlocking growth and homes than the recently published London Growth Plan – the London Plan should be aligned with this ambition.</p>

4.4 London's heritage	<p>The Council agrees that London is world-renowned for its heritage and built environment. Its historic buildings and landscapes are of cherished importance and are part of what contributes to a strong sense of place and community pride.</p> <p>We welcome the opportunity for the London Plan to provide clarity on the role that heritage assets can play in meeting net zero and improving resilience to climate change. There is a misunderstanding that historic buildings cannot be sensitively retrofitted and adapted, and we would welcome evidence to help inform this approach. Within the Borough, we have some successful examples of retrofitting historic buildings which can be shared to feed into the evidence base.</p>
4.5 Designing the homes we need	<p>Please see wider comments in this section.</p>
4.6 Heat risk, ventilation and overheating	<p>The Council declared a climate change emergency in 2019, has a climate change action plan, and has made commitments to become a carbon neutral organisation by the year 2030 and a zero carbon borough by the year 2043.</p> <p>The Council supports the approach of the new London Plan to be more rigorous on passive design and ventilation measures, but to go with national standards for active design. For the active measures it would be helpful if there was some flexibility should Local Plans want to pursue a more detailed approach. It would be useful for this to be informed by detailed modelling and designing which incorporates the prospect of warmer conditions.</p> <p>It would be beneficial for the GLA to provide guidance on best practice on passive design and ventilation measures and to understand the cost and viability impact versus powered heating, ventilation and cooling solutions. Whilst the Council supports the prioritisation of passive design, it is important to understand the impact on construction costs and whole plan viability</p> <p>There needs to be flexibility to reflect national standards as they change, however, as above, it is important that individual Boroughs are able to introduce policies which go beyond national standards to ensure, in the Council's case, it achieves its net zero target by 2043, , and for the Mayor to achieve his pledge to make London a net zero carbon city by 2030.</p>
4.7 Homes for families	<p>The Council agrees with the approach of leaving family housing requirements to be determined by individual boroughs. We consider that what constitutes a family-sized home (e.g. according to bedroom numbers) should be able to vary by borough, as the demographics of boroughs (such as the average size of families) are different - as we see the case being between Richmond and Wandsworth. A pan-London strategic approach could prevent the Council from taking the localised approach it currently does which, for example, is more accepting of site optimisation in town centres but more strongly seeks to protect existing family accommodation outside these areas. It is far better for boroughs to set this approach based on their own local circumstances.</p> <p>A strategic approach to the loss of family sized housing is likewise not recommended, as demographics can vary substantially between boroughs. For example, parts of London have much higher rates of multigenerational living, whilst other areas can see higher numbers of individual parents. It is therefore important that boroughs are able to identify what they consider to be the most appropriate forms of family sized housing to protect in their borough.</p> <p>In relation to making areas more child friendly, a London wide approach would be difficult to achieve. Whilst we consider it may be possible to identify design principles which seek to achieve this, we would recommend that specific measures to achieve this should instead be left to local authorities to set out based on their local demographics.</p>
4.8 Accessible housing	<p>The Council notes that the current London Plan requires 10 per cent of new homes to be wheelchair accessible or adaptable in line Part M4(3) of the Building Regulations. It only requires full wheelchair accessible homes within low-cost rented housing, including social rented housing.</p> <p>The Council notes the Mayor is considering whether wheelchair accessibility standards should be sought from a proportion of non-affordable housing, e.g. market housing. The Council supports the broad principle of this but would suggest a consistent London-wide approach to wheelchair housing</p>

	<p>from non-affordable housing may be difficult to implement, especially as different Boroughs will have different levels of need in relation to wheelchair accessible housing. It may therefore be more appropriate for this decision to be deferred to Local Plans where an appropriate percentage could then be informed by a local understanding of need. However, the Council would agree with the option for there to be a greater emphasis for providing wheelchair accessible housing from intermediate affordable housing tenures, on the proviso that it is defined in close collaboration with Registered Providers. Whilst the principle of delivering more wheelchair accessible housing is, of course, supported, it is important that the percentage sought is set at a level to meet likely need, rather than a level that would significantly exceed need, given that adhering to the M4(3)(b) standards does have financial and density implications on development. If, for example, a minimum mandatory London-wide percentage was introduced at say 5%, but the need in a particular area was only for 2%, this additional requirement may then unnecessarily reduce the overall amount of affordable housing that can be achieved, especially within larger schemes. In this respect, the Council would encourage the Mayor to consider whether the appropriate percentage of fully wheelchair accessible homes to be sought from non-affordable housing is an issue that is consistent enough across London to be addressed through a London Plan policy, or whether it should instead be set through Local Plans, informed by local needs assessments.</p>
4.9 Space standards and other requirements	<p>The Council supports the principle that the London Plan should continue to opt in to the Nationally Described Space Standard (NDSS) as a minimum expectation, exceeding these (and allowing Local Plans to exceed these) where justified.</p> <p>In addition to the NDSS for new self-contained homes, the Council considers it would be beneficial for the Mayor to consider expanding the use of space standards and facility standards for forms of non-self contained housing which are not currently well-covered by the NDSS, including, for example, larger Housing of Multiple Occupation (HMOs). London Plan Policy H16, which addresses large-scale purpose built shared living, includes a list of communal facilities envisaged to be included (at part 6). As a result, proposals for large HMOs may be argued to not fall under London Plan policy H16, and therefore within the scope of the quality criteria within it (at point 7), because as a form of housing they were either not purpose built or do not provide many of the facilities seen to characterise large-scale purpose-built shared living as a housing product, such as a concierge or a bedding and linen changing and/or room cleaning services. This, as just one example, creates a potential policy vacuum which can, in the worst cases, be exploited to provide homes which fall below the standards that the Mayor and/or the Council aspire to achieve.</p>
4.10 Designing for everyone	<p>Please see wider comments in this section.</p>
London’s infrastructure, climate change and resilience	
5.1 Energy efficiency standards	<p>The Council encourage the Mayor to take an ambitious and positive approach to addressing climate change through the new London Plan. As stated elsewhere in its response, the Council declared a climate emergency in 2019 and has developed a Climate Change Action Plan which sets out the ways in which the Council will achieve its ambitions to become a Carbon Neutral Council by 2030 and a Net Zero Borough by 2043.</p> <p>To support these ambitions, the Council supports the Mayor’s intention explore setting “different energy standards for buildings” as it presents an opportunity to align London policy with leading industry practice. The Council encourages the GLA to consider adopting the approach of Energy Use Intensity (EUI), as used in frameworks like LETI. These provide a more accurate measure of building performance and help ensure energy efficiency improvements.</p> <p>The Council appreciates the need to review the role of carbon offset, as well as the targets and metrics employed, to ensure their effectiveness in achieving genuine carbon reductions. In this regard, the council urges the Mayor to consider implementing a new London wide minimum carbon offset</p>

	<p>price, which aligns with the actual cost of carbon and addresses local climate action requirements. This proposal accounts for a truer reflection of the impact of carbon emissions</p> <p>The Council would encourage the Mayor to incorporate Energy Use Intensity (EUI) as a fundamental metric within planning policy and building performance standards, in accordance with Policy Option 2 from the Haringey report <i>Delivering Net Zero</i> (May 2023). Compared to existing compliance based approaches such as SAP, EUI provides a transparent and performance focused method by focusing on actual energy consumption, both in predicted models and measured post occupancy. Adopting EUI would enhance accountability by enabling post occupancy verification of building performance using real metered data, helping to close the performance gap between design and operation. It also allows for more meaningful comparisons across building types and developments through a common, measurable metric. Furthermore, this approach aligns with emerging best practices, with organisations such as LETI and the UK Green Building Council (UKGBC) increasingly advocating for EUI based standards, and it complements the GLA's carbon performance monitoring objectives.</p>
5.2 Heat networks	<p>The Council recognises that heat networks will play an increasingly important role in decarbonising heat supply, avoiding excessive reliance on the UK electricity grid supporting the transition away from gas boilers. The Council's Local Plan provides active support to district heat networks in Heat Network Priority Areas and heat networks have been established within the Nine Elms Opportunity Area. To support exploration of heat network opportunities, the Council refers to the Mayor of London's Heat Map. The Council has itself not commissioned research to identify the opportunity for future heat networks but would be interested to work alongside the Mayor to consider how this policy approach could make it easier for individual Boroughs to offer guidance and evidence to support implementation. The new London Plan could potentially provide clear technical and legal frameworks for how such waste heat should be captured and transferred, and outline the roles and responsibilities of network developers and waste heat providers.</p>
5.3 Whole life-cycle carbon (WLC) and Circular Economy (CE)	<p>The Council would encourage the Mayor to ensure the new London Plan requires Whole Life-Cycle Carbon (WLC) assessments and Circular Economy (CE) statements for all major developments. London must address embodied carbon in materials and construction. The new London Plan should set clear carbon benchmarks and minimum quotas for reused and recycled materials. The Council supports piloting materials passporting and seeks guidance on local reuse hubs to manage construction waste.</p> <p>In particular, the Council would encourage the Mayor to consider:</p> <ul style="list-style-type: none"> • Setting benchmark targets or thresholds for embodied and whole life-cycle carbon that developments must meet or justify against. As councils often lack in-house expertise to verify WLCAs and CE statements. • Extending WLCA requirements to include major refurbishments and all demolition applications over a certain threshold. Reinforces the commitment to retrofitting. <p>Currently, the lack of enforceable Whole Life-Cycle Carbon (WLC) and Circular Economy (CE) targets creates uncertainty and inconsistency across London boroughs, particularly for Retrofits. To address this, the London Plan should introduce clear, phased targets for embodied carbon emissions, aligned with the LETI Climate Emergency Design Guide, which recommends benchmarks of less than 600 kgCO₂e/m² for non-domestic new builds and less than 500 kgCO₂e/m² for domestic new builds. A robust benchmarking framework should be embedded into planning policy, similar to the Greater London Authority's 'Be Seen' energy monitoring approach. This would allow applicants to demonstrate performance against set carbon thresholds</p> <p>Wandsworth Local Plan (2023) policy LP13 Circular Economy, Recycling and Waste Management expects developers to reuse, recycle, or recover 95% of construction and demolition waste and find beneficial uses for 95% of excavation waste.</p> <p>The Council strongly supports the ambition to embed circular economy principles more deeply into the Mayor's strategic planning framework. As part of this circular economy requires not only strong policy direction but also the proactive provision of enabling infrastructure. To realise the full benefits</p>

	<p>of a circular economy, the London Plan must move beyond policy commitments and actively identify, support, and safeguard the physical infrastructure necessary for CE practices. The Council would encourage the Mayor to explore inclusion of a dedicated policy or strengthened sub-policy within the London Plan to identify and allocate land for key circular economy premises, including sites for the repair, refurbishment, and resale of materials and goods or permanent facilities that allow the storage, processing, and redistribution of surplus construction materials within boroughs if feasible.</p>
5.4 Waste	<p>The Council supports the GLA's approach to committing to reducing waste and using resources more efficiently and the need to retain existing waste sites in waste use. The Council promotes the circular economy principles and recognise that implementing the waste hierarchy is fundamental in reducing the amount of waste produced and ensuring that materials are reused, repaired and recycled. The Council supports the approach of using the Extended Producer Responsibility (EPR) scheme and the Deposit Return Scheme (DRS) are approaches in delivering this.</p> <p>Recognising that there are competing land uses within the Borough, the Council considers there is a need to prioritise ensuring existing waste sites are retained and optimised to ensure the Council's wastes responsibilities can be delivered for current and emerging waste streams. In order to achieve this, the Council considers that the definition of existing waste sites within the London Plan is reviewed to ensure that sites that have historic waste uses that may have benefited from Certificates of Lawful Use are included and can continue to be used to support managing waste streams. The Council considers waste sites should only be released to other land-uses where waste processing capacity is re-provided at or above the same level as that lost elsewhere within London, to ensure that London achieves net self-sufficiency and future waste streams can be appropriately managed.</p> <p>With regard to recycling of waste in residential properties, evidence shows that outer London boroughs e.g. Richmond-upon-Thames (41% in 2023/2024) achieve greater recycling rates than inner city boroughs e.g. Wandsworth (23% in 2023/2024), this is to some degree a reflection of the building typologies and space i.e. houses vs flats. Different targets and initiatives could target address specific challenges e.g. aimed at increasing recycling rates in flats / large developments and increased recycling of commercial waste.</p> <p>The first stage of the Waste Hierarchy is 'prevention', the second stage is 'preparing for re-use'. The Council would encourage the Mayor to consider whether there is a role for the London Plan to provide guidance, targets and initiatives for reuse to work alongside the government's Extended Producer Responsibility (EPR) scheme and the Deposit Return Scheme (DRS) for packaging..</p> <p>Further guidance would be useful on the promotion of circular economy hubs.</p>
5.5 Green and open spaces	<p>The Council supports the emergence of the Local Nature Recovery Strategy (LNRS) and London Green Infrastructure Framework as useful tools for understanding the strategic role of London's green and open spaces, and for providing a range of useful data and maps which aid implementation at the local level. The Council encourages this strategic approach to allow boroughs to prioritise where greening should be protected or enhanced and/or connected based on a local understanding of needs and opportunities. In this respect, the Council welcomes the strategic direction of exploring opportunities for rewilding and nature restoration but would encourage the Mayor to ensure the new London Plan is not overly prescriptive in a way that prevents locally responsive measures and strategies to be embedded into Local Plans.</p> <p>The Council notes there is no reference in this section to play spaces and wider play provision in this section. The Council would encourage the Mayor to acknowledge the importance of delivering play spaces and wider play provision for securing positive spaces and outcomes for children and young people, and to explore ways in which the new London Plan can drive improvements to standards in this area, beyond the requirements of current Policy S4. This could include stronger articulation of the circumstances in which developments should deliver high-quality and accessible playspace, supported by a review of the Supplementary Planning Guidance in place for Play and Informal Recreation, which the Council notes is now some 13 years old.</p>
5.6 London's open spaces	<p>The Council notes that the current London Plan only takes designated parks and larger open spaces into account when considering open space deficiencies at a strategic level. The Council supports the general principle of giving additional recognition to smaller green areas and linear spaces as part of understanding London's overall green infrastructure network, not least because these areas can provide valuable access to open spaces in</p>

	<p>areas where large green areas are limited, but also to enhance connectivity between sites. However, the Council would encourage the Mayor to ensure that any additional recognition given to smaller green areas is captured in a sufficiently strategic way by the London Plan and that detailed measures to plan for, manage and enhance these spaces, many of which will have a Borough or neighbourhood-level catchment, remains sufficiently localised and is predominantly addressed through Local Plans and wider Council strategies.</p> <p>Please see wider comments by the Council in relation to MOL and Green Belt in other parts of this response.</p>
5.7 Green infrastructure and biodiversity	<p>In relation to Biodiversity Net Gain, the Council would encourage the Mayor to support a London-wide decisive policy shift from “no net loss” to a mandatory BNG requirement above the 10% national requirements set out in schedule 14 of the Environment Act 2021 on developments. Several London councils have declared both climate and ecological emergencies, recognising the intertwined nature of these crises. Specifically, London Borough of Hammersmith & Fulham (H&F), Westminster City Council, Waltham Forest Council, Ealing Council, Tower Hamlets, and Camden Council have taken these steps. Hounslow Council and Barnet Council also declared a climate emergency, which is a crucial first step towards addressing the ecological crisis.</p> <p>BNG offers a more rigorous and measurable approach than the Urban Greening Factor (UGF), as it quantifies the ecological value of habitats and ensures actual biodiversity improvements.). While UGF has helped incorporate greenery into urban design, it often prioritises aesthetic interventions over genuine ecological function. However there is significant merit in UGF and combined with BNG has the potential for vast improvements to London’s Green Infrastructure. While the UGF has supported positive integration of greenery into urban design, it often lacks the ecological rigour necessary to halt or reverse biodiversity decline. When implemented together, UGF and BNG can deliver complementary benefits: UGF enhances immediate environmental quality and urban character, while BNG delivers long-term habitat value and ecological connectivity. The London Plan should therefore require robust biodiversity reporting, the use of BNG metrics from the earliest design stages, and a strategic focus on habitat creation and connectivity.</p> <p>The Council supports the UGF target set rather than a recommended target as set in the current adopted London Plan.</p>
5.8 Water	<p>The Council supports the Mayor’s statement that London’s waterways are vital assets, and to acknowledge the essential social, environment and economic benefits they bring.</p>
5.9 The strategic importance of London’s waterways	<p>The Council broadly supports the direction of the London Plan in looking to increasing the emphasis on Local Plans improving water quality, as opposed to just considering it, and assessing ways in which the new London Plan could incorporate practical actions for enhancing water quality across London’s waterways. The Council looks forward to working with the Mayor to consider the nature of such policies and to help inform how they can be implemented at development level.</p>
5.10 Flood risk management	<p>The Council supports the principle of the new London taking a more stringent approach to achieving Greenfield Runoff Rates (GRR), and welcome the principle of mandating an off site provision where GRR would not be met on site. The Council also support the use permeable materials where planning permission is required but are aware that much householder development, including for example the conversions of front gardens into a paved surfaces or other hard surfaces associated with houses can be legally undertaken under the Permitted Development Rights (PDR) (Class F of Part 1 of the Town and Country Planning (General Permitted Development) (England) Order 2015) and do not require planning permission, and that therefore local planning authorities lack the oversight necessary to mandate use of permeable materials in these cases.</p>
5.11 Water management	

	<p>The Council notes that the current London Plan promotes a catchment-based approach to water policy. The Council broadly supports the principle of a more strategic approach to water management in light of emerging and growing concerns about London’s water availability and quality. Int his context, the Council would welcome a renewed focus on water quality and catchment based approach from the new London Plan, and practical measures for Local Plans to take to incorporate this effectively</p>
5.12 Transport’s role in London’s growth	<p>Effective management of traffic and providing good public transport connectivity is a critical component for the success of a place and for local growth. The Local Implementation Plan encourages a move towards the use of sustainable transport modes (active travel and public transport) through reducing car and vehicle dependency, which in turn, will reduce problems for other road users. Busy roads are recognised to have a severance effect, reducing connectivity and adversely impacting on amenity. The Council, therefore, require developments coming forward to be of a scale that is related to the area’s infrastructure and environmental capacity including the provision of public transportation and active travel infrastructure. Development proposals will be supported if they contribute to a safe, green, accessible and integrated transport systems that contribute to the efficient operation of London’s overall transport system, with improved access by foot, bicycle or public transport to and from surrounding areas (including Central London).</p> <p>The adopted Local Plan supports the emerging London Plan approach with the provision of Area Strategies which direct development towards the most accessible and well-connected places, in order to make the most effective use of existing public transport infrastructure and potential future enhancements, and walking and cycling networks. The Council will support policies which seek to minimise car use and address existing and new development impact on local transport issues.</p> <p>The Council has a longstanding position opposing any expansion of Heathrow, including a third runway, due to the negative impact on the quality of life of Borough residents. There are also questions around whether plans for a third runway previously developed by Heathrow would deliver growth for London and the rest of the UK. We would request that the new London Plan reflects these concerns and rules out Heathrow expansion. The Council supports a better not bigger Heathrow, and on this basis would request that a reference to supporting the delivery of a Southern Rail Access link to Heathrow which would support growth along this corridor. We would also request that the London Plan include a reference to supporting more Gatwick-bound rail services stopping at Balham, to take advantage of the tube interchange and providing improved connectivity</p>
5.13 Sustainable transport networks to support growth	<p>The Wandsworth adopted Local Plan recognises the link between housing and transport and encourages developments to be accessible for all within a 15 minute walking distance. The Local Plan also outlines Area Strategies to ensure strategic areas of the borough are developed in a cohesive manner, are well connected and support healthy streets approach whilst addressing local needs and opportunities. The Council therefore supports the approach of strengthening the link between transport and housing at borough level where local needs and opportunities can be explored, and consider that this link can be addressed within individual Local Plans as well as supportive documents such as the Local Implementation Plans and planning obligations/CIL charges.</p> <p>The Council has adopted a Walking and Cycling Strategy that includes focused development on improved walking and cycling networks across the borough, and have integrated the Healthy Streets Approach into the design of highway schemes. The Council supports the link between growth and the development of local walking and cycling networks.</p> <p>The Council consider that key to supporting this work is ensuring that neighbouring boroughs fulfil their duty to cooperate for strategic cross-boundary issues relating to housing and transport.</p> <p>The Council would appreciate further clarity from the Mayor in relation to future growth in eVTOLs, noting the impact our residents already face from helicopter movements along the river and in/out of the London Heliport. The Council would encourage the Mayor to consider whether a more considered and balanced</p>

	<p>approach could be taken to meeting London’s needs in this respect which more evenly spread and mitigate impacts, such as identifying new heliport locations, and to consider the role that the new London Plan could play in managing the impacts of increased movements, including to manage harmful noise impacts.</p>
5.14 Car parking, cycle parking and deliveries	<p>The Council have adopted the Walking and Cycling Strategy (2022-2030) in 2022 which supports the Future Streets Strategy that aims to create a cleaner, greener and safe environment for walking and cycling, supporting the adopted Local Implementation Plan. The Council, therefore, strongly supports approaches within the London Plan that align with these strategies and encourage the adoption of sustainable transport options, and enhance walking and cycling networks across London.</p> <p>The Council also supports works to explore new opportunities to understand and measure connectivity for Londoners and look at opportunities to reduce the level of vehicle movements into sites. Where appropriate, the Council support the removal of on-site car parking provision except for that necessary to support the proper functioning of the uses on the sites and for those with disabilities.</p> <p>The Council recognise that provision of cycle parking is a crucial factor in encouraging more sustainable travel around the borough and within London. Whilst there is a balance to be achieved with what developers can afford within a development scheme and changes in the National Use Class Order for business uses, the Council consider that minimum cycle parking standards should be defined within the emerging new London Plan that ensure that sufficient cycle parking is provided to cater for demand in the current forecasts as well as for encouraging further use over time. Appropriate reference to the London Cycle Design Standards is recommended to ensure that cycle parking is designed and located in accordance with best practice.</p> <p>The provision of new Electric Vehicle charging infrastructure, and parking for e-scooters, e-bikes, dockless cycle hire and cargo cycle is encouraged provided it is sympathetic to the public realm and does not hinder pedestrian movement or obstruct visually impaired people or those using wheelchairs or buggies.</p>
5.15 Responding to transport trends and new technologies	<p>Through its Future Streets Strategy, the Council are committed to implementing a comprehensive approach to promoting sustainable, low carbon and active travel options, this has included exploring options for e-scooter, e-bike, and e-cargo trials and assess the viability and integration into the existing borough’s transport network. The Council therefore recognises the role that technology can play in enhancing transport offerings within the borough and support policy approaches within the London Plan that allow for new and emerging technology to be supported and trialled.</p> <p>The Council would also support regional approaches at exploring opportunities in delivering a network of infrastructure that supports the use of hydrogen buses as a sustainable mode of public transport.</p> <p>The Council recognise that ‘advanced air mobility’ is emerging technology that could align with the sustainability goals of improved air quality, and less congestion on the roads within the borough, however the Council are clear this should not come at the expense of impacts to local residents in terms of noise, safety and privacy. The Council considers further evidence is required to demonstrate if advanced air mobility is a safe and viable transport approach within London and the borough and that it would not conflict with existing land-uses, land designations, the local environment, and strategic infrastructure (for example local airports).</p>
5.16 Fire safety	<p>The Council notes that since the current London Plan was published, there have been changes to Building Regulations on fire safety, including in relation to higher-risk buildings over 18 metres or seven storeys.</p> <p>The Council supports the Mayor’s suggested approach to remove overlapping, confusing and duplicative planning policy and building regulations. This would ensure that fire safety is appropriately considered by those qualified to assess compliance with the relevant regulations and avoid the implication that the local planning authority should be involved in assessing fire safety where the relevant specialism actually lies within the Building Regulations industry. The Council also welcomes any approach to make it clearer when fire safety policies are to be applied and support the Mayor’s suggestion that it ought to primarily relate to major developments where people sleep on the premises.</p>

5.17 Air quality	<p>The London Plan is vital to the Air Quality agenda as it helps set standards and goals for development and enables officers to have meaningful and productive conversations and set standards to promote cleaner air both during construction and throughout occupancy and use, as well as protecting sensitive receptors and helping drive down pollution in key areas.</p> <p>The Council welcomes the commitment to the World Health Organizations objectives for air pollution; however the Council suggests this commitment needs to determine firm objective levels. Many London Borough's new Air Quality Action Plans are making firm commitments, and to support those boroughs, the Mayor should ensure the London Plan is in alignment.</p> <p>The Council understands the benefits of cleaner air, but as pollution does not respect boundaries and London has a complex air quality picture, it is important that the same degree of commitment is set across London.</p> <p>The proposals for the new London Plan signal growing expectations on air quality in development however it will need to offer clearer guidance and incentives to help developers deliver responsibly.</p> <p>The construction fleet in London is already the world's cleanest thanks to the Mayor's Low Emission Zone for Construction (NRMM). However, the Industry wishes to go further and decarbonise, since battery alternatives to diesel are often not feasible. Construction will often require off-grid supply. Power management considerations need to form part of the planning process, there are current case studies that show carbon, toxic emissions and fossil use can be significantly reduced, alongside cost savings, which can all be made if careful consideration is given early on and conditioned in the planning process.</p>
5.18 Heat risk	<p>The Council supports the principle of the London Plan taking a positive approach to reducing overheating risk in buildings. The Council agrees with the London Plan approach to promoting design measures, such as canopy cover and use of appropriate materials, and strengthening the requirements for development proposals relating to overheating of buildings.</p> <p>Wandsworth Local Plan Policy LP4 Tall buildings states 'Building materials should be capable of ensuring that the proposals would not contribute to the urban heat island effect as a result of thermal radiation or the release of anthropogenic (waste) heat. Regard should be had to Policy LP10 (Responding to the Climate Crisis)' It would be useful for the Mayor to consider whether further direction or policy regarding those building materials would be useful for Boroughs.</p>
5.19 Healthy communities	<p>The Council reflects the London Plan Policy E9 within its Local Plan. The Council would encourage the Mayor to ensure the new London Plan takes an ambitious and clear approach to how development must respond to the need to deliver healthy and safe communities and to ensure that any drive to streamline the London Plan or reflect challenging market conditions does not result in a loss of ambition in this area.</p> <p>As a specific concern, the Council notes that the NPPF deviates from the London Plan by stating that local planning authorities should refuse applications for hot food takeaways and fast-food outlets that are near where children congregate <u>unless in a designated town centre</u>. In built up urban areas such as London, it is quite possible and even probable that applications for new takeaways within 400 metres of a school are located in a town centre and thus the additional text within the NPPF has the potential to weaken an important policy tool for combatting childhood obesity. The Council would encourage the Mayor to maintain the stricter approach within the London Plan and clearly set out why direct application of the NPPF clause is inappropriate within London.</p> <p>Likewise, the Council would encourage the Mayor to consider ways in which the London Plan could seek to restrict other uses which may be harmful to children, such as vape shops, within a prescribed distance of where children congregate.</p>