Report to the
London Borough of Wandsworth

by Linda Wride  Dip TP MRTP

an Inspector appointed by the Secretary of State for Communities and Local Government

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE
LONDON BOROUGH OF WANDSWORTH CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 20 March 2009
Examination hearings held between 2 and 16 February 2010

File Ref No: LDF 000804
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAP</td>
<td>Area Action Plan</td>
</tr>
<tr>
<td>AHEVA</td>
<td>Affordable Housing Economic Viability Assessment</td>
</tr>
<tr>
<td>CIL</td>
<td>Community Infrastructure Levy</td>
</tr>
<tr>
<td>CS</td>
<td>Core Strategy</td>
</tr>
<tr>
<td>DPD</td>
<td>Development Plan Document</td>
</tr>
<tr>
<td>DMPD</td>
<td>Development Management Policy Document</td>
</tr>
<tr>
<td>GLA</td>
<td>Greater London Authority</td>
</tr>
<tr>
<td>GOL</td>
<td>Government Office for London</td>
</tr>
<tr>
<td>IC</td>
<td>Inspector’s Changes</td>
</tr>
<tr>
<td>LDF</td>
<td>Local Development Framework</td>
</tr>
<tr>
<td>LDS</td>
<td>Local Development Scheme</td>
</tr>
<tr>
<td>LSIA</td>
<td>Locally Significant Industrial Area</td>
</tr>
<tr>
<td>LSP</td>
<td>Local Strategic Partnership</td>
</tr>
<tr>
<td>MC</td>
<td>Minor Changes</td>
</tr>
<tr>
<td>MUFIA</td>
<td>Mixed Use Former Industrial Area</td>
</tr>
<tr>
<td>OA</td>
<td>Opportunity Area</td>
</tr>
<tr>
<td>PF</td>
<td>Planning Framework</td>
</tr>
<tr>
<td>PPG</td>
<td>Planning Policy Guidance</td>
</tr>
<tr>
<td>PPS</td>
<td>Planning Policy Statement</td>
</tr>
<tr>
<td>RSL</td>
<td>Registered Social Landlord</td>
</tr>
<tr>
<td>S</td>
<td>Section</td>
</tr>
<tr>
<td>SA</td>
<td>Sustainability Appraisal</td>
</tr>
<tr>
<td>SCI</td>
<td>Statement of Community Involvement</td>
</tr>
<tr>
<td>SCS</td>
<td>Sustainable Community Strategy</td>
</tr>
<tr>
<td>SHLAA</td>
<td>Strategic Housing Land Availability Assessment</td>
</tr>
<tr>
<td>SIL</td>
<td>Strategic Industrial Land</td>
</tr>
<tr>
<td>SFRA</td>
<td>Strategic Flood Risk Assessment</td>
</tr>
<tr>
<td>SMAA</td>
<td>Strategic Housing Market Assessment</td>
</tr>
<tr>
<td>SPD</td>
<td>Supplementary Planning Document</td>
</tr>
<tr>
<td>SSAD</td>
<td>Site Specific Allocations Document</td>
</tr>
<tr>
<td>UDP</td>
<td>Unitary Development Plan</td>
</tr>
<tr>
<td>VNEBOAPF</td>
<td>Vauxhall Nine Elms Battersea Opportunity Area Planning Framework</td>
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1 Introduction and Summary of Overall Conclusion

1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
(a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document
(b) whether it is sound.

1.2 This report contains my assessment of the London Borough of Wandsworth Core Strategy (CS) DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.

1.3 I am satisfied that the DPD meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted CS against the advice set out in paragraphs 4.51 – 4.52 of Planning Policy Statement 12 (PPS 12). In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan.

1.4 The changes I have specified in this report are made only where there is a clear need to amend the document in the light of the legal requirements and/or to make the document sound in accordance with PPS 12. **Annexes A and B** contain schedules of changes. I have used the Council’s suggested wording, unless stated otherwise.

1.5 The changes set out in **Annex A** (prefix IC) are those required to make the DPD sound. For the most part, these changes arose out of further work undertaken by the Council in response to concerns I raised at an Exploratory Meeting held in June 2009. They were subject to public consultation between September and November 2009, and post-submission sustainability appraisal (SA) in September 2009. A further change which came forward during the hearing sessions was subject to targeted public consultation in February 2010, after the hearing sessions finished.

1.6 **Annex B** (prefix MC) are Proposed Minor Changes. Some of these changes were put forward in the statements prepared by the Council for the hearing sessions, some in response to matters arising at the hearings themselves and the remainder were identified as part of a proof reading exercise. They add clarity to the DPD by sign-posting how and where strategic policies are being carried forward in subsequent DPDs; update the DPD where necessary; deal with minor typographical errors and improve grammar without changing the thrust of the strategy. As these minor changes are not required to address soundness issues, I have not dealt with them in detail in my report. However, I believe their inclusion is required to ensure that the CS is clear, up-to-date, coherent and easily understood.

1.7 **My overall conclusion is that the London Borough of Wandsworth Core Strategy DPD is sound, provided it is changed in the ways specified in Annex A. The principal changes required are, in summary:**
a) To amend Policies PL 5 (provision of new homes) and IS 5 (achieving a mix of housing), together with the supporting text, to require housing targets, including affordable housing targets and the tenure split between affordable rented and intermediate affordable housing, to be reviewed when the replacement London Plan is adopted.

b) To amend Policy IS 5 c (affordable housing) so that the definition accords with national guidance; to ensure the trigger for affordable housing provision is consistent with the London Plan; to specify the proportion of affordable housing required based on the findings of the Affordable Housing Economic Viability Assessment, and to clarify the circumstances in which a site specific economic viability assessment will be required; to signpost that other housing policies will be included in the Development Management Policies Document.

c) To amend Policy IS 5 g (gypsy and traveller accommodation) and the supporting text to refer to the estimated requirement for additional pitches in the plan period 2017/18 - 2021/22; clarify the role of the Site Specific Allocations Document in meeting future needs; indicate how demand for, and provision of, additional pitches will be monitored and reviewed.

d) To amend policies relating to the locations where tall buildings may be acceptable (Policies IS 3, PL 11, PL 12, PL 13, PL 14) to reflect the Council’s Stage 1 Urban Design Statement and to acknowledge the ongoing work in the Stage 2 Urban Design Statement and lower level DPDs.

e) To replace Policy IS 7 b (planning obligations) with a new section which refers to the Council’s intention to develop a Supplementary Planning Document on Planning Obligations and an associated Community Infrastructure Levy (CIL) charging schedules to support the provision of infrastructure projects.

f) To amend Policy PL 7 (waste management) and supporting text to confirm the Council’s role as waste planning authority; set out the DPDs which provide the spatial delivery tool to implement the Municipal Waste Management Strategy; refer to the movement of waste up the waste hierarchy; correct the estimate of land required to meet the London Plan waste apportionment figures; ensure this requirement is reviewed when the replacement London Plan is published.

g) To amend Policy PL 11 (Nine Elms and adjoining areas in north east Battersea) the supporting text so that targets for homes and jobs and the quantum/mix of development permissible in the Vauxhall Nine Elms Battersea Opportunity Area (VNEBOA) are reviewed when work on the VNEBOA Planning Framework is complete, and that the outcomes are fed into the Spatial Strategy for the Queenstown Road to Nine Elms area coming forward in the Site Specific Allocations Document DPD.

h) To substitute the revised Infrastructure Delivery Table.

1.8 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the
examination in terms of justification, effectiveness and consistency with national policy.

2 Legal Requirements

2.1 The London Borough of Wandsworth Core Strategy is contained in the Council’s Local Development Scheme (LDS), the most recent LDS having been approved in January 2010. The CS was submitted to the Secretary of State for examination in the timescale specified. In response to issues of significant concern identified at an Exploratory Meeting in June 2009, further work was undertaken by the Council over the summer of 2009, whilst the examination was suspended for 11 weeks. This caused some slippage in the anticipated timing of the Pre-Hearing Meeting (PHM) and the hearing sessions. However, it should be possible to adopt the DPD by September 2010, as envisaged in the LDS.

2.2 The Council’s Statement of Community Involvement (SCI) was adopted in January 2007. It is evident from the documents submitted by the Council, including the Regulation 25, 26 and 30 (e) Statements and its Legal Compliance Self-Assessment Statement that the Council has met the requirements as set out in the Regulations.

2.3 Alongside the preparation of the DPD, it is evident that the Council has carried out a parallel process of sustainability appraisal.

2.4 The screening assessment of the CS identifies two Special Areas of Conservation (SAC): Wimbledon Common (part of which lies within the borough) and Richmond Park, which lies on the borough boundary. In accordance with the Regulations contained in Articles 6(3) and (4) of the Habitats Directive, the Council carried out a Habitats Regulations Assessment. The report concludes that the policies contained in the CS are not likely to have a significant effect on either the Wimbledon Common or Richmond Park Special Areas of Conservation, and therefore an “Appropriate Assessment” is not required. Natural England agreed with the Council’s general conclusion. Accordingly I am satisfied that the Appropriate Assessment stage of the DPD is not required.

2.5 Subject to the changes in Annex A, I am satisfied that the DPD has regard to national policy.

2.6 By letter dated 22 October 2008 the Mayor of London indicated that the CS was not in general conformity with the London Plan in respect of three main matters. Firstly, the reference to “net” rather than “gross” units in Policy IS 5 relating to the trigger for affordable housing contributions. Secondly, there was no protection for the existing traveller and gypsy site; no criteria for selecting new traveller and gypsy sites, and no reference to the need to identify new sites where shortfalls make this necessary. Thirdly, the CS did not have a policy to protect the existing housing stock, including affordable housing. These matters were addressed in the submission version of the DPD and subsequent changes following the additional work undertaken in the summer of 2009.

2.7 By letter 6 November 2009, the Mayor of London confirmed that, on the whole, the changes to the submission document proposed in
response to the concerns I had identified at the Exploratory Meeting generally conform with the approved London Plan. Likewise, policies throughout the documents are, on the whole, in general conformity with the London Plan. Subject to the changes I have identified in Annex A, I am satisfied that the DPD will be in general conformity with the adopted London Plan.

2.8 It is evident that the development and content of the CS has been informed by the Sustainable Community Strategy (SCS). The key strategic priorities of the SCS are set out in Chapter 1 of the Core Strategy.

2.9 I am satisfied that the DPD complies with the specific requirements of the 2004 Regulations (as amended) including the requirements relating to the publication of prescribed documents; notification of DPD bodies, local advertisement and making documents available for inspection, together with the requirement to provide a list of superseded saved policies, as set out in CS Appendix 7.

2.10 Drawing all these matters together, and subject to changes set out below, I consider that all legal requirements have been satisfied.

3 Soundness - Whether the Core Strategy is justified; effective and consistent with national policy

Overview

3.1 I start my consideration of whether the CS is sound with a general assessment of the DPD against the requirements of PPS 12, flagging up key issues which raise soundness considerations. I then deal with these issues in more detail, including any changes which I consider necessary to make the plan sound.

Is the CS justified?

The evidence base: participation, research/fact finding

3.2 Initial consultation on issues and options took place in 2005, and continued through 2006 and 2007 on the issues and options and preferred options stages of the CS. Consultation on the proposed submission version of the CS was undertaken in 2008, feeding into the version submitted for examination in 2009. In the course of these consultations, the Council engaged key stakeholders as well as the wider community, including meetings with focus groups and the Wandsworth Community Empowerment Network. Stakeholder engagement also included “calls for sites” for those with an interest in land in Wandsworth. I am therefore satisfied that the evidential base includes the views of the local community and others with a stake in the future of the area.

3.3 For the most part, policies in the strategy are founded on an extensive, robust and credible evidence base, including an Open Space Study; Strategic Flood Risk Assessment; Retail Needs Assessment, and biennial retail surveys of the borough’s town centres, local centres and important local shopping parades.

3.4 The housing strategy is informed by a series of Housing Needs/Market Assessments, and annual housing reports, along with
work on potential housing sites which fed into the London Strategic Housing Land Availability Assessment/Housing Capacity Study (SHLAA/HCS), published whilst the examination was in progress. Housing policies are also informed by historic housing data collected as part of the Council’s comprehensive monitoring programme. This is a good indicator of housing trends over a prolonged period, both before and during the current recession. It also provides reliable information about the length of time that housing proposals are in the pipeline, i.e. between the grant of permission, implementation and completion of new residential development, and the creation of additional units by conversions.

3.5 However, my initial examination of the CS highlighted two areas where the evidence base was deficient. Firstly, in setting its affordable housing target, the Council had not assessed the economic viability of land for housing in the area, or the economic viability of any thresholds or proportions of affordable housing proposed. In response to this concern, the Council commissioned an Affordable Housing Economic Viability Assessment (AHEVA). This assessment, in turn, lead to post-submission changes to Policy IS 3 and the supporting text in respect of affordable housing requirements. I discuss the AHEVA and associated changes in more detail when considering affordable housing in Issue 2.

3.6 Secondly, there seemed to be limited evidence underpinning the Council’s approach to identifying areas of the borough where tall buildings may be appropriate. In response to this concern, the Council drew together in one document *Stage 1 Urban Design Statement* the evidence underpinning its strategic approach to the location of tall buildings. A draft *Stage 2 Urban Design Study* published during the examination further tests and refines the assessment of areas where tall buildings may be appropriate, and provides locational guidance for tall buildings within these broad areas. I refer to the additional evidence and associated CS changes proposed when considering tall buildings in Issue 6.

3.7 The evidence base has not stood still; it has been continually added to and updated in the course of the examination. For example, the Employment Land Report published in 2006 was in the process of being reviewed during the examination. I was subsequently provided with a copy of the interim report, which I refer to when dealing with the local economy in Issue 9.

3.8 Other key documents added to the evidence base in the course of the examination include the London SHLAA/HCA (as previously noted) and the draft replacement London Plan, which was subject to consultation whilst the hearings were in progress. In addition, the Greater London Authority (GLA) published the consultation draft of the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (VNEBOAPF). I discuss the implications of these documents for housing land supply (and in respect of the OA Planning Framework, also employment) in Issue 1 in respect of housing supply and Issue 7 in relation to the VNEBOA.

3.9 During the CS examination, the Council published and consulted on preferred options for the Site Specific Allocations Document (SSAD) and the Development Management Policies Document (DMPD). In some key areas, these lower level DPDs provide essential flesh on
the bones of how the CS will be delivered. In others, they carry forward in more detail the broad strategic policies in the CS.

3.10 Arising from the work carried out for these lower level DPDs, the Council suggested various changes to policies and the supporting text, in the course of the hearings. In my report, I distinguish between changes which are collectively essential to demonstrate how the CS will be delivered and therefore necessary to make the plan sound, and minor changes which helpfully signpost the role of lower level DPDs, but do not go to the heart of soundness.

Alternatives

3.11 The preferred strategy was arrived at following consideration of two alternative visions for the development of the borough up to 2010, either as a predominantly residential dormitory, reliant on central London, or as a more self-sufficient borough but with development focussing on a single town centre. These approaches were rejected following sustainability appraisal and public debate, in favour of the preferred spatial strategy.

3.12 In summary, this promotes the five existing town centres on an equal but unique footing; supports the limited release of industrial land for mixed use development whilst maintaining a strategic reservoir of land to meet the needs of industry, warehousing and waste management; promotes regeneration to tackle pockets of deprivation, and identifies the main areas of change and development as being along the Thames riverside, and within the five town centres and the Opportunity Area.

3.13 I am satisfied that the CS represents the most appropriate way forward when considered against reasonable alternatives, having regard to the sustainability of the selected strategy, and the environmental, social and economic benefits of this approach.

Is the CS effective?

Deliverability: infrastructure delivery planning and partnership working

3.14 Key infrastructure requirements are set out in a schedule appended to the CS. In response to concerns highlighted in my initial examination of the CS, prior to the Exploratory Meeting the Council produced a comprehensive Infrastructure Delivery Table which identifies the infrastructure requirements associated with each policy in the CS and the Indicators used to monitor progress on each policy. This table was updated in the course of the hearings.

3.15 At the hearings, it emerged that detailed work on infrastructure planning for development in the Opportunity Area was being undertaken as part of the VNEBOAPF. I consider matters relating to infrastructure planning in more detail under Issue 12.

3.16 The CS will be implemented and delivered through a combination of private sector investment, the Council’s own strategies and initiatives and the work of other agencies and bodies. The Wandsworth Local Strategic Partnership (LSP) will be key to implementing the CS vision. The range of plans, programmes and strategies of the public, private, voluntary and community
organisations and agencies forming the LSP are set out in Chapter 1 of the CS. LSP resources will mainly focus on regeneration to tackle pockets of deprivation in parts of the borough, and the provision of education, health and community facilities, play and open space.

3.17 Much of the investment in housing, employment and retail floorspace will be delivered by the private sector, in the case of affordable housing with funding from the Homes and Communities Agency (HCA), where appropriate. Further affordable housing will be provided by Registered Social Landlords (RSL) and the Council’s Hidden Homes programme. I consider the delivery of affordable housing in more detail in Issue 2.

3.18 Improvements to transport infrastructure, particularly public transport, are key to unlocking much of the borough’s potential, including development in the VNEBOA, Central Wandsworth and the Wandle Delta. These improvements will largely be delivered by central Government, Transport for London (TfL) and public transport operating companies. Financial contributions secured by planning obligations and the Community Infrastructure Levy (CIL) will contribute towards funding transport infrastructure and improvements and other infrastructure provision. I consider these key elements in the delivery of infrastructure in Issue 12.

Deliverability: Regulatory and policy barriers

3.19 Based on the evidence, I am satisfied that the strategy does not pose a threat to protected wildlife sites or landscapes and there are no other regulatory or policy barriers to delivery.

Coherency

3.20 The Council is working in partnership with the GLA, TfL, English Heritage and the London Borough of Lambeth on the VNEBOA, an area which straddles the Wandsworth/Lambeth border. This joint working arrangement should ensure that cross-boundary issues arising from the major change coming forward in the OA are addressed in a coherent manner. Other examples of partnership working include a joint study with the London Borough of Merton to identify areas for regeneration in the Wandle Valley, and participation in the Wandle Valley Regional Park Steering Group.

Flexibility

3.21 PPS 12 requires plans to show how contingencies will be handled; core strategies should show what alternative strategies have been prepared to handle uncertainty, and what would trigger their use. As submitted, Wandsworth CS makes no specific reference to contingency plans and triggers. However, the Council clarified its intentions in this respect at the hearing sessions, and proposed various changes which I deal with in Issue 12.

Monitoring

3.22 The Council has well established monitoring systems for a range of key planning information. As noted earlier, in response to concerns highlighted in the early stages of the examination, the Council produced a revised Infrastructure Delivery Table which includes key
indicators for each CS policy. The Annual Monitoring Report (AMR) will indicate progress, or lack of it, against these indicators.

3.23 In **Issue 12**, I consider the definition of acceptable performance range and triggers for remedial action in the event that performance falls outside this acceptable range, together with triggers for review and contingency plans.

**Is the CS consistent with national policy?**

3.24 As noted earlier, at the time it was submitted, there were a number of areas where the CS was not consistent with national policy advice. In particular, the absence of an affordable housing economic viability appraisal and the absence of a SHLAA, at both borough and London-wide level.

3.25 However, these inconsistencies have been addressed by core documents added to the evidence base in the course of the examination. Subject to the changes set out in Annex A, I am satisfied that the DPD is consistent with national policy.

3.26 **Issue 1: Housing land supply**

*Will the CS enable the continuous delivery of housing for at least 15 years in accordance with the advice in, and requirements of, Planning Policy Statement 3 Housing (PPS 3)? Will it deliver sufficient new units to meet the adopted London Plan housing targets? Does it have regard to the possibility of a significant change in housing delivery in the emerging London Plan, and the implications of such a change for the Core Strategy?*

3.27 The London Plan 2008 sets a target of providing at least 7450 additional homes in Wandsworth over the ten year period 2007/8-2016/17. This figure is rounded up to an annualised target of 750 new units a year in the CS. A joint statement issued by the Government Office for London (GOL) and the GLA in 2008 advised London Boroughs that until such time as a London-wide SHLAA could be undertaken, the annual London Plan 10 year target should be rolled forward to cover the 15 year period required by PPS 3. The CS follows the recommended approach, setting an indicative figure of 3750 additional homes for the period 2017/18-2021/22.

3.28 The five year supply of deliverable housing sites is detailed in Appendix 2 of the Annual Monitoring Report (AMR) at Tables 2.6-2.9 and Map 2.1. In summary, a total of 3816 conventional units are identified as being deliverable between 2010 and 2015; this is equivalent to 763 units per annum. This level of supply would exceed the adopted London Plan and CS annualised housing target.

3.29 The AMR 5 year deliverable supply of housing is based on new build sites currently under construction and conversions in progress which were not expected to be completed by April 2010. It also includes new build sites and conversions with planning permission at March 2009 which are expected to be deliverable by March 2015, using average pipeline delivery timescales for new build (5.8 years) and the average time taken to deliver conversions (3 years).

3.30 The Council’s 2009 Housing Capacity Assessment (HCA) identifies sites expected to come forward for development during years 6-10
as having a potential capacity for 4278 units (855 per year). These include sites with full permission discounted from the five year supply, sites with outline permission and sites with undetermined applications for housing development. The HCA also identifies a number of London SHLAA sites for Phase 3 delivery (covering the same period) which have a notional capacity of 4547 units (909 per year). Both sets of figures exceed the adopted London Plan housing target of 745 per year without relying on windfall sites, in accordance with PPS 3.

3.31 Broad locations for future growth in years 11-15 are indicated in the CS as the borough’s five town centres, the Thames Riverside and through the limited release of surplus industrial land and sites. These broad locations are areas where significant infrastructure exists or is planned; their identification as areas for future housing growth is consistent with the general thrust of other issue and place based policies in the CS.

3.32 The HCA acknowledges that the economic downturn could lead to longer delivery timescales than those assumed in the AMR’s housing trajectory. To plan for both economic recovery and prolonged economic uncertainty, the HCA assesses housing capacity using two different delivery timescales, one based on the average pipeline delivery times described above, the other with an extended delivery timescale of 9 years for new build and 6 years for conversions. In both cases, projected delivery would exceed the adopted London Plan target by a significant margin (82% above target in scenario 1 and 52% above target in scenario 2).

3.33 Based on these figures, I am satisfied that the CS will enable the continuous delivery of housing for at least 15 years sufficient to meet the adopted London Plan housing targets, even if delivery timescales are extended due to slow economic recovery.

3.34 The absence of a borough SHLAA and the methodology used in the London SHLAA/HCA (which differs from the approach set out in CLG’s good practice guidance) has lead to criticism that the Wandsworth CS approach to housing land supply is inconsistent with the advice in, and requirements of, PPS 3. In particular, doubts have been expressed about whether stakeholders were genuinely involved in identifying potential sites, and whether the deliverability of sites in the first five year supply tranche have been properly market tested.

3.35 In the case of the five year supply, the AMR includes a commentary which explains how each site has been assessed against the delivery tests in PPS 3. This assessment is informed by an annual telephone survey of agents/developers to gather up-to-date information about progress on sites with unimplemented permissions. Sites are discounted if the agent/developer cannot be contacted or is unable to provide information on progress; where the permission is close to expiry and there is no indication of activity on the site; where it is known that development has been aborted, will not be implemented, or that an alternative scheme to develop the site is being pursued.

3.36 Potential housing sites for years 6-10 have been identified as part of the work undertaken for the 2009 London SHLAA/HCA. Although
it does not follow the standard methodology set out in CLG’s practice guidance\(^1\), the SHLAA/HCA sets out clearly the approach taken, including stakeholder involvement in the Steering Group overseeing the study from inception to implementation, and the open “call for sites”. The SHLAA/HCA also highlights the unique circumstances of London’s housing market which underpin the refined methodology used to assess sites with housing potential and to arrive at a realistic phasing of development.

3.37 Many of the Wandsworth SHLAA sites were identified initially as part of the ongoing work on the borough’s SSAD, which also included a “call for sites” to engage land owners, agents and developers. These sites were subject to discussions with stakeholders as part of the SSAD process and annual phone survey.

3.38 Taking all these matters into account, I find the CS approach to housing land supply consistent with national policy advice, having particular regard to the deliverability of sites in years 1-5 and stakeholder engagement. For the reasons given, I consider that the CS will achieve the 10 year housing targets in the 2008 London Plan and the indicative target rolled forward for years 11-15.

3.39 However, I am mindful of the advice in PPS 3 that in circumstances where the RSS (including the London Plan) is in development or under review, local planning authorities should have regard to the level of housing provision in the emerging RSS. This is reflected in the advice to boroughs in the London SHLAA/HCA that where a significant change in housing land availability may occur, and where this is sufficient to have a significant impact on future policy and delivery, the borough’s LDF should have regard to this information.

3.40 In Wandsworth’s case, the London SHLAA specifies a new annual target of 1280 units per year for the period 2011/12–2020/21. This represents a percentage increase of 72% relative to the current annual target, one of the highest % increases in all the London boroughs, second only to the LB Havering. Although detailed figures are in dispute, it is common ground between the Council and the GLA that the borough’s housing targets will change significantly when the final version of the London Plan is published. This is likely to be late in 2011, less than two years into the plan period covered by Wandsworth CS.

3.41 The Council’s 2009 HCA considered the housing targets set out in the London SHLAA/HCA and identified a potential shortfall in the projected number of units delivered against the overall provisional target in the event of extended delivery time scales. Likewise, such circumstances may result in affordable housing provision falling slightly short of the numerical target currently agreed with the GLA, assuming this remains unchanged. However, given the anticipated scale of increase in the overall housing target, I think it likely that both targets will be reviewed in tandem when the replacement London Plan is published.

3.42 Although the Council has had regard to the significant increase in housing land supply likely to come forward early in the plan period, and the implications of this change for housing delivery, this is not

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\(^1\) Strategic Housing Land Availability Assessments Practice Guidance CLG July 2007
reflected in the CS, as drafted. As a result, at the hearing, the Council proposed a change to paragraph 4.36 in the text supporting Policy PL 5 which acknowledges the significant increase in housing targets in the London SHLAA/HCA. This change commits the Council, correctly in my view, to a review of the CS housing targets following publication of the replacement London Plan.

3.43 Change IC2 is a slightly amended version of the Council’s suggested wording to include a reference to the timescale of the initial review, which is important to highlight in my view, given how early this will occur in the life of the CS.

3.44 I consider it necessary to include the commitment to review housing targets within the body of Policy PL 5, as well as drawing attention to this matter in the supporting text, given the significant increase in the housing target coming forward and the early timescale for implementing this target. I have therefore added a reference to the review at the end of the policy (IC3).

3.45 In addition to dealing with the review of housing targets, the Council’s suggested change signposts the whereabouts of the borough’s base housing trajectory, which is due to be moved from the AMR (where it is to be found at present) into the SSAD, at which point it will be updated to cover the period up to 2025/26. This element of the change accords with government advice that base trajectories should be included in either the core strategy or a site allocation DPD which deals with housing, and subsequently updated as part of the AMR. I have therefore retained this element of the Council’s suggested wording in change IC2.

3.46 In order to make the CS sound, changes requiring a review of housing targets and signposting the housing trajectory as set out at IC2 and IC3 of Annex A to my report should be incorporated.

### Issue 2: Affordable housing

Does the CS affordable housing target in Policy IS 5 reflect the definition of affordable housing in PPS 3 and is it consistent with the requirements of the 2008 London Plan target; is the policy underpinned by a robust assessment of the affordable housing economic viability; will affordable housing provision meet the needs of both current and future occupiers, having regard to tenure mix, size and type of accommodation?

#### Affordable Housing Definition

3.47 As submitted, Policy IS 5 c refers to affordable housing as “a mix of intermediate (equity share) and social rented accommodation”. I understand that the reference to equity share was intended as an example to provide clarity for those unfamiliar with the term intermediate housing. However, the Council accepts that this reference could be misinterpreted as restricting the type of intermediate affordable housing sought in the borough, in conflict with the definition in Annex B of PPS 3.

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3.48 To address this concern, the Council suggested inserting “e.g.” before the words “equity share” in Policy IS 5 c. To my mind, this still gives an unintended prominence in the policy to one particular type of intermediate housing, and could be perceived as favouring shared equity over other types of intermediate housing. I therefore prefer the Council’s alternative suggestion to remove the reference to equity share entirely, thus avoiding the risk that the CS definition of intermediate affordable housing might be seen as in conflict with the definition in PPS 3. This requires changes to both the supporting text at paragraph 4.143 (IC25) and the policy (IC30).

Affordable Housing Trigger
3.49 The size of development which will trigger a requirement for affordable homes is specified as a net figure in Policy IS 5 d, whereas the London Plan threshold is given as a gross figure. In the course of the examination, the Council proposed a change to Policy IS 5 c to address this discrepancy. This change (IC32) would make the policy consistent with the 2008 London Plan in terms of circumstances where affordable housing will be required, thereby making the plan sound in this respect.

Affordable Housing Target
3.50 The 2008 London Plan sets an overall target of 50% of new dwellings from all sources to be affordable, with 70% of these to be for rent. Within this context, each Council is expected to set its own targets. PPS 3 does not specify how local targets should be expressed, or favour one type of target over another; it is for each Council to set an overall plan-wide target for the amount of affordable housing to be provided.

3.51 Wandsworth and the GLA have agreed a numerical target to provide 3725 affordable homes in the borough between 2007/8 and 2016/17. This is equivalent to 50% of Wandsworth’s overall housing target in the 2008 London Plan which, in turn, was based on the 2004 London Housing Capacity Assessment. In theory therefore, the agreed numerical target for affordable housing in Wandsworth is consistent with the London Plan and would help deliver the overall target of 50% of new dwellings in the capital be affordable.

3.52 However, based on the Council’s housing trajectory, the borough expects to deliver significantly more dwellings than assessed in the 2004 HCA. In practice therefore, the numerical affordable housing target specified in the CS now represents considerably less than 50% of the borough’s overall housing provision. It falls well short of meeting the housing needs demonstrated by the Council’s own 2009 Housing Market Assessment (HMA) update. The HMA highlights that the shortfall in affordable housing is increasing and now stands at around 1700-1800 affordable dwellings a year, a figure which exceeds the existing housing target for the borough, as well as current and projected levels of housing delivery.

3.53 Addressing affordability by increasing housing supply is a key Government priority. Given the Council’s trajectory of future housing supply and the high level of housing need identified in the borough SHMA, I would expect any numerical target for affordable housing to represent a higher proportion of overall housing supply.
The gap between the agreed numerical affordable housing target and overall level of housing supply is likely to widen when the final version of the replacement London Plan is published and new housing targets are in place. Widening this gap would undermine the CS strategic aim to meet affordable housing needs. I therefore consider that the Council’s suggested changes to review the affordable housing target when the replacement London Plan is published, in the both supporting text (IC26 and IC28) and at the end of Policy IS 5c (IC31), are necessary to make the plan sound.

Affordable Housing Economic Viability Assessment

PPS 3 requires the overall target for the amount of affordable housing to reflect an assessment of the likely economic viability of land for housing in the area, taking into account risks to delivery and drawing on informed assessments of the likely levels of finance available, including public subsidy and reasonable levels of developer contribution. It also requires local authorities to undertake an informed assessment of the economic viability of the thresholds and proportions of affordable housing proposed, including their likely impact on overall levels of housing delivery and creating mixed communities.

Following a Court of Appeal judgement in the summer of 2008, CLG drew attention to the need to demonstrate the economic viability of affordable housing targets and thresholds in line with PPS 3, and advised that testing of economic viability considerations should be undertaken as part of the evidence base for plan-making. The CLG note made it clear that it is not sufficient to say that viability will be assessed on a site-by-site basis.

At the time it was submitted in spring 2009, the CS was not supported by an affordable housing economic viability assessment (AHEVA). Rather than specifying a proportion of affordable homes, Policy IS 5 sought the maximum amount of affordable housing on individual sites, taking economic viability (amongst other things) into account on a site-by-site basis. In these respects the CS as submitted is unsound, having regard to the requirements of PPS 3.

In response to the concerns raised during my initial examination of the DPD, the Council commissioned an AHEVA. This tests three affordable housing levels, 25%, 33% and 50% (based on the UDP, CS Preferred Options and current London Plan targets respectively) against key variables including existing use, land value and a range of tenure splits, both with and without grant subsidy, taking into account other scheme requirements including s.106 obligations.

The AHEVA was added as a core document whilst the examination was suspended, thereby addressing a significant gap in the evidence base. Although the three affordable housing levels tested in the AHEVA have all been subject to consultation and SA in the past, there was a further round of public consultation on the new evidence and the Council’s proposed changes which flowed from this additional evidence. The SA has been updated in the light of changes to the affordable housing policy which flow from this new evidence, and I am satisfied that stakeholders had the opportunity

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1 Blythe Valley BC v Persimmon Homes
to consider the findings of the AHEVA and have been properly consulted on the consequential changes proposed to the CS.

3.60 In summary, the AHEVA found that in most normal conditions, 33% affordable housing is likely to be deliverable in combination with planning obligations up to £15000 per unit, especially where residential sales values are at, or above, £5500 per m$^2$. It states that such values are likely to be common place in a recovering market during the plan period. The AHEVA also found that 50% affordable housing might also be deliverable in various combinations of values and densities, although the range of viable schemes narrows when tested using the highest profit level and planning obligations variables (22.5% and £15000 respectively).

3.61 When market conditions become more favourable and sales values rise, the circumstances where achieving in excess of 33% and up to 50% affordable housing on individual sites could increase, and start to include sites with higher existing use values. Viability will also improve if build costs reduce, thereby offsetting some of the impact of falling values. However, there is some disparity between forecasters on future build cost trends.

3.62 Following the AHEVA, the Council proposed a change Policy IS 5 d to introduce a requirement that at least 33% of homes on individual sites are affordable, whilst seeking a higher level of affordable housing provision where possible. Where schemes propose less than 50% affordable housing, or a tenure split which does not accord with Policy IS 3 c (which was also proposed to be changed), applications should be supported by a site-based economic viability assessment which takes into account individual site costs, the availability of public subsidy, other scheme requirements and economic viability.

3.63 The Council accepts that that there will be occasions when it will not be possible to achieve the minimum 33% affordable housing requirement on an individual site. A change (IC26) to paragraph 4.144 explains that the policy will be applied flexibly taking into account the site-based economic viability assessment.

3.64 As submitted, the proposed changes to Policy IS 5 d gave rise to some confusion amongst representors. I believe this confusion has arisen for several reasons: references to both 33% and 50% in the policy; confusion around whether 33% is intended as a target or minimum requirement; whether the Council will apply the target/requirement flexibly, and uncertainty as to whether site specific viability statements are required to support schemes proposing less than 33% affordable housing, proposals involving 33%-50% affordable housing, or all schemes coming forward with less than 50% affordable housing.

3.65 The Council’s statement and the discussion at the hearing clarified these matters. In the light of this explanation, I have made some small amendments to the wording of the proposed change to Policy IS 5 d (IC32) and the supporting text (IC27) in the interests of clarity. However, I have not altered the thrust of the policy as proposed to be changed by the Council, or its requirements.
3.66 Before dealing with the proposed change to tenure split, I consider whether AHEVA provides robust and credible evidence to support the requirement to provide a minimum of 33% affordable housing on individual sites. In reaching my view on this issue, I have had the benefit of an independent review of the AHEVA by an expert advisor appointed by The Planning Inspectorate. Both the AHEVA and review document were on the CS website and available to view before affordable housing was discussed on 2 February 2010.

3.67 There is no government advice specifying how viability should be assessed. A number of models have been developed for viability testing, most of which work on a residual land value basis. The Council’s AHEVA methodology uses this approach. This methodology has also been used to assess the economic viability of affordable housing in other core strategies and generally (although not exclusively) found acceptable when examined independently.

3.68 However, the basic methodology was originally developed for site specific valuations; problems can arise when it is used to assess viability on a borough-wide basis, where variables such as existing and alternative use values are dynamic in time and space. In addition, because of the gearing effect, a small change in input variables can cause large changes in residual land value, reflecting market volatility. Consequently small differences in the assumptions underpinning the AHEVA can have a significant impact on the affordable housing target considered to be achievable.

3.69 In my view, to be robust, inputs used in the model need to reflect changing market values over a period of time, and the variation in values evident in different parts of the borough. In addition, wherever practicable, assumptions about variables such as density and exception costs should be based on a range of figures informed by borough-based data so as to reflect local circumstances, in preference to using an “industry standard”.

3.70 The Wandsworth AHEVA uses Land Registry house price data for sites in the borough covering the period June 2007–June 2009. This captures both the peak of the last economic boom and the fall in property value that followed. Whilst it is not possible to predict with certainty how values will move over the lifetime of the CS, in my view, this historic data provides a useful proxy for future values given the range of economic conditions during the period covered.

3.71 Existing Use Values (EUV) used in the analysis range from £13 million to £48 million per hectare. This range reflects geographic variation across borough where higher value developments in the north contrast with lower sales values in the south. I have no reason to doubt that most EUVs in the borough will fall within this range, even if the geographic gradient is not smooth.

3.72 Whilst the highest densities used in the model exceeds those specified in the London Plan Matrix, the selected range reflects the density of schemes granted permission in the borough over a number of years. A significant proportion of family housing is included in all the density ranges modelled, in line with the housing mix specified by the Council.
3.73 Affordable housing values used in the analysis reflect advice from Registered Social Landlords (RSL) active in the borough. Based on this information, the model adopts a fixed value that an RSL would expect to pay for completed units of affordable housing. It has been run on both a with/without grant basis, and tests three variations of local tenure split. In these respects, I am satisfied that the AHEVA’s approach reflects local circumstances.

3.74 Compared to some other London boroughs, historically Wandsworth has sought a relatively low level of financial contribution through planning obligations. Based on figures for 2008/9, this equates to £1335 per residential unit. Rather than use this low figure as an input, the appraisal model tests three higher levels of s106 contributions (£5000, £10000 and £15000 per unit) in recognition of the substantial amount of funding likely to be sought in future from developments. I think this is a reasonable approach.

3.75 Much, if not all, of the land coming forward in future for housing in Wandsworth is previously-developed, in industrial, storage or distribution use, in areas at risk of flooding. The AHEVA recognises that extensive decontamination could require significant expenditure which, in turn, would have a considerable impact on residual land value. Given the potential costs of remediation and provision of flood mitigation measures, I was concerned that no allowance had been made for exceptional costs in the modelling.

3.76 In response to this concern, it was pointed out that the vast majority of developments are undertaken on recycled land, and that tenders collected by the RICS Build Cost Information Service (used in the AHEVA) reflect this pattern of development and therefore the average cost of remediation and other abnormal costs. Sites with abnormally high levels of contamination or clear up requirements are relatively few (the gas works site at Riverside West being the only example of a major housing site). The Council is not aware of a large number of other sites where contamination is likely to be an issue. In relation to the provision of flood mitigation measures, it seems that such costs are likely to be relatively small, based on experience to date. I found these responses reassuring.

3.77 Taken together with the other variables used in the model (developers profit, construction costs, gross to net floorspace) the total outputs amount to 72576 individual residual evaluations. I accept that the residual land value approach has its drawbacks for a borough-wide study. However, until such time as a more refined and targeted methodology has been developed, given the large number of valuations underpinning the AHEVA results, I consider this evidence to be as robust as an assessment based on a smaller number of site specific examples, the alternative approach to viability assessment suggested at the hearing.

3.78 Nevertheless, there is one element of the AHEVA that causes me particular concern. The AHEVA acknowledges that land owners have expectations about the value of their land which exceed the value of the existing use. It is accepted that, in most cases, the likelihood that RUV will simply be greater than EUV will not be sufficient to encourage owners to bring sites forward. The Council’s hearing statement explains that this is the reason why the AHEVA
builds in a 15% premium above EUV, assuming that this level of uplift would provide sufficient incentive to induce an owner to sell.

3.79 I am concerned about the lack of transparency around this uplift assumption, which is not referred to explicitly in the AHEVA. Although unclear from the supporting text (paragraph 5.1) in the course of the examination I have been assured that a 15% uplift premium is built into the EUV used in Tables 10 and 11 of the AHEVA, which set out the assessment of viability.

3.80 There is no explanation in the document or the Council’s statement as to why a figure of 15% has been selected, or what evidence it is based upon. At the hearing, I was told that the 15% uplift is derived from broad averages, and is generally accepted as a benchmark in London. This was not disputed. The Council has since provided several appeal decisions from elsewhere in the country where the level of uplift used in viability assessments was a material consideration. The premium of 15% adopted in the Wandsworth AHEVA lies within the middle of the range of the premium applied in these cases.

3.81 Whilst these considerations go some way to addressing my concern, considered in isolation, I am not wholly persuaded that they provide up-to-date, locally-based, robust evidence sufficient to demonstrate that a 15% premium would provide the necessary incentive for owners in Wandsworth to bring forward land for development.

3.82 In response to my concerns, the Council has analysed the ownership of housing sites in the development pipeline. This indicates that almost 15 years supply of housing units (based on the current annualised housing target) are already in the ownership of developers/owners actively preparing applications. To my mind, the fact that sites with the capacity to provide this number of units have already been acquired by developers, or are owned by those actively engaged in putting them on the market, makes the uplift premium adopted (and therefore the evidence supporting it) less critical than it would be in other circumstances.

3.83 I am also mindful that the overall housing target and the affordable housing target will be reviewed, and the economic viability of any revised targets reassessed, when the replacement London Plan is published, probably by the end of 2011. All these considerations have informed my view that the existing affordable housing target (as proposed to be changed) is economically viable in the interim, and the CS sound in this respect.

3.84 The Council’s suggested change to Policy IS 5 c also relates to the tenure split between social rented and intermediate affordable housing. It proposed to change the tenure split from 70%-30% (as in the adopted London Plan) to 60%-40%, thereby reducing the proportion of social rented relative to intermediate housing. The Council justifies this change on the basis of information on housing need gathered in the 2009 HMA update, and sets it in the context of draft changes being put forward in the emerging London Plan which proposes a similar revised tenure split.

3.85 The 2009 HMA update draws attention to the increased shortfall in both forms of affordable housing. As at July 2009, the annual
shortfall in affordable rented housing was just over 1000 dwellings and that for intermediate housing around 700 dwellings. Taken at face value, these figures appear to justify a proposed tenure split to 60%-40%.

3.86 However, as noted in the HMA, it is not clear whether the recent reversal in the fall of affordable rented housing supply experienced in 2008/9 is a blip, or the beginning of a new pattern. Had applicants with a lower level of affordable housing need (mainly those looking to move from the family home) been included in the assessment, the proportion of social rented housing would have been much higher. The HMA also points out that the exclusion of low cost market housing from the definition of affordable housing inflates the apparent shortfall in intermediate affordable housing.

3.87 Perhaps most importantly, the HMA notes the significant downturn in the housing market since need assessments began in the borough. As the needs model is based on past trend data, projections may appear out of kilter with the immediate situation. It advises that the results of the 2009 assessment should be seen as a “broad indication of where we are heading, rather than a forecast of what will happen”, given the uncertainty about whether there will be a return to previous patterns following the downturn.

3.88 I am also mindful that Wandsworth is part of the much larger London housing market, where social rented accommodation represents a higher proportion of the overall need for affordable housing. As noted in the London Plan, housing need is a strategic issue, in that some boroughs cannot meet need within their own boundaries. Affordable housing targets should be sensitive to the economic and social circumstances of London. The appropriate balance between social rented and intermediate housing should have regard not only to local circumstances, but also the Mayor’s London-wide assessment of the need for a 70:30 balance.

3.89 Taking all these matters into account, I am not convinced that a robust case has been made to change the tenure split over the lifetime of the plan in favour of intermediate affordable housing based primarily on evidence in Wandsworth’s most recent HMA. In reaching this view, once again, I am mindful that the affordable housing target will be reviewed when the replacement London Plan is published in less than two years time. By then, the longer term trends in housing need and supply will be somewhat clearer, and the evidence to justify any change in tenure split more robust.

3.90 Consequently, I do not consider there to be sufficient evidence to justify changing the tenure split at present. However, it ought to be revisited as part of the review of overall and affordable housing targets following the publication of the replacement London Plan.

3.91 To draw together all these threads, I consider that the AHEVA addresses the significant gap in the evidence base and justifies the amount of affordable housing the Council now seeks to secure as a minimum proportion on individual sites. However, the affordable housing target and tenure split will need to be reviewed following the publication of the replacement London Plan and the economic viability of any revised targets reassessed. Furthermore, changes
are needed to address soundness concerns about definition of affordable housing and the trigger for its provision.

3.92 Whilst Policy IS 5 will provide the strategic direction to achieve a mix of housing in the borough, it does not cover all the matters required to be set out in Local Development Documents (LDD) by PPS 3. At the hearing, the Council advised that detailed policies on the size and type of market housing, affordable housing, specialist and supported housing will be set out in the DMPD, along with policies to retain the existing stock of family housing. This is highlighted in IC24. The DMPD will also contain a commitment to produce supplementary guidance covering the implementation of housing policies.

3.93 Taken together, the CS and DMPD will address PPS 3 requirements relating to tenure, profile of household types requiring market housing and the size and type of affordable housing required. As the emerging policies in the DMPD referred to above, supplemented by housing guidance in the proposed housing SPD, are essential to demonstrate how a mix of housing will be delivered, in order to make the plan sound I consider it necessary to emphasis the role of these documents within the policy as well as the supporting text (IC24). I have amended the Council’s suggested wording to include a reference to the housing SPD in IC34.

3.94 **In order to make CS Policy IS 5 sound, it should incorporate the changes set out in IC30, IC31, IC32 and IC34**

3.95 **In order to clarify how Policy IS 5 is intended to be applied, the supporting text should be amended in accordance with changes IC24, IC25, IC26, IC27 and IC28**

3.96 **Issue 3 Gypsies and travellers**

How will the CS ensure that the anticipated pitch requirements of gypsies and travellers will be met over the plan period?

3.97 The 2008 London Borough’s Gypsy and Travellers Accommodation Needs Assessment (GTANA) identified a need for up to 7 pitches in the borough between 2007 and 2012, and 2-3 additional pitches between 2012 and 2017. To cover the plan period beyond 2017, the 2008 London Plan advises boroughs to roll forward targets on an annualised basis until a new GTANA is prepared, taking account of Government advice that growth in gypsy and traveller households is expected to be 3% a year.

3.98 The existing gypsy and traveller site at Trewint Street currently has 12 residential pitches. However, capacity will be reduced to 10 pitches when new standards for gypsy and traveller pitches are implemented. To address the anticipated loss of two pitches and to meet future need during the plan period, the Council has already started the search for a suitable site to accommodate additional pitches, based on the criteria set out in Policy IS 5 g.

3.99 The emerging SSAD identifies land adjacent to the existing site as a potential location to accommodate additional pitches to meet future need. The area in question is larger than the existing site and
therefore has the potential capacity to meet not only the need identified in the current GTANA, but also the extra pitches anticipated during the remainder of the plan period, based on the Government’s advice on growth of gypsy and traveller households.

3.100 A minor alteration to draft Policy 3.9 of the emerging London Plan proposes to reduce the number of additional pitches required in the borough from 10 to 6. Although the final figure may differ in the published version of the replacement London Plan, I think it unlikely that the direction of travel will change. Consequently, I feel confident that the accommodation needs of the gypsy and traveller community can be met during the lifetime of the CS.

3.101 However, as the role of the SSAD is critical to the identification and delivery of sufficient and suitable land to meet the accommodation needs of gypsies and travellers during the plan period, I consider it necessary to include a reference to this in Policy IS 5 g and supporting text, as set out in IC33 and IC29 respectively. The Council’s suggested change also updates the figures to cover the whole of the plan period and indicates how provision will be monitored and reviewed. These elements are necessary to ensure that the policy will be effective, in terms of flexibility and monitoring and therefore meet the test of soundness.

3.102 In order to make CS sound, Policy IS 5 g and the supporting text should be amended to refer to the role of the SSAD in identifying a new site to meet the long term needs of gypsies and travellers, and include arrangements for monitoring and review as set out in changes IC29 and IC33.

3.103 Issue 4 Housing implementation strategy
Does the CS set out clearly a housing implementation strategy which reflects the guidance in PPS 3?

3.104 PPS 3 requires LDDs to set out a housing implementation strategy that describes the approach to managing the delivery of housing and previously-managed land targets and trajectories. As all Wandsworth housing sites are expected to be recycled, no previously-developed land target or trajectory is specified in the CS (or the other LDDs identified in the borough’s Local Development Scheme). In these circumstances, I do not regard the absence of a previously-developed land target and trajectory as undermining the soundness of the CS.

3.105 Chapter 5 of the CS describes in broad terms how the CS will be implemented and delivered. Paragraph 5.2 describes the role of various stakeholders in the delivery of new housing, including affordable housing, and highlights the role of s.106 agreements in the provision of the latter. However, the CS section on implementation and monitoring does not include a comprehensive housing implementation strategy on the lines required by PPS 3.

3.106 My examination of this issue has therefore focussed on whether the matters specified in paragraphs 62-67 of PPS 3 are dealt with elsewhere the CS. If not, whether they will be addressed in any other LDDs which are in the course of production. Failing that,
whether any shortcomings identified can be remedied by the changes suggested by the Council at the hearings, in order to make this part of the plan consistent with PPS 3 and therefore sound in this respect.

3.107 The Council is confident that sufficient housing will be delivered to meet existing housing targets. This confidence is underpinned by evidence in the HCA, including an assessment of delivery against targets based on average and extended pipeline delivery timescales. The Council has also looked ahead at the more challenging housing targets likely to come forward in the replacement London Plan and identified circumstances where delivery may fall short of targets. I am therefore satisfied that the Council has undertaken scenario planning as part of its approach to managing the delivery of housing. However, to be consistent with national policy, a reference to this should be included in the CS or other LDD, or its whereabouts signposted in the CS.

3.108 Should monitoring indicate that targets may not be met, the Council advises that the AMR will highlight the need for contingency planning and/or review of policy. It seems to me, however, that planning for circumstances which may arise but cannot be predicted with certainty is, by definition, an activity which should be undertaken in advance of those potential events arising. Housing implementation strategies include contingency plans in order to identify different delivery options which can be brought into play if housing delivery does not occur at the expected rate.

3.109 The CS does not identify different housing delivery options. No such options are coming forward in any other emerging LDD as far as I can see, or included in the Council’s proposed changes submitted at the final hearing. Given its confidence that existing housing targets will be met and exceeded, the Council may feel it unnecessary to identify different delivery options at this stage. However, the absence of such options means that the CS housing implementation strategy is inconsistent with PPS 3 in this respect.

3.110 It is not clear from the CS as submitted whether the Council has undertaken a risk assessment to identify obstacles and constraints to housing delivery, or developed management strategies to address any risks. However, it is evident from its statement and the discussion at the hearing that the Council has considered risks to housing delivery and is playing a proactive role to reduce the likelihood of the most significant risks occurring.

3.111 In particular, the Council intends to work with others to ensure that funding is secured to provide the infrastructure necessary to support development and unlock the potential of the major growth areas in the borough. The Council is also committed to undertake a wider review of targets, including those for key areas of change in the borough, following the publication of any replacement London Plan. These intentions are set out in change IC38.

3.112 It would be preferable, in my view, for the CS to incorporate a more systematic approach to identifying obstacles and constraints to housing delivery and setting out management strategies to address these risks. However, the new paragraphs on “risk” proposed in
change IC38 are consistent with PPS 3 requirements and sufficient to address my concerns about soundness in this particular respect.

3.113 I have already noted how the Council engaged stakeholders in the identification of land for housing through the open call for sites as part the SSAD and uses the annual telephone survey of agents and developers to assess deliverability of housing sites. The Council’s hearing statement draws attention to pre-application discussions and the Planning Service Agents Forum as other methods of stakeholder engagement. Furthermore, I noted earlier in my report the Council’s comprehensive approach to the monitoring and review of housing delivery against targets.

3.114 The Council’s good practice with regard to stakeholder engagement, monitoring and review of housing delivery performance is therefore acknowledged. However, PPS 3 requires the local authority’s approach to these matters to be included in the housing implementation strategy set out in LDDs. This information is not included in either the CS or the emerging DPDs. Nor is it explained in the changes proposed by the Council in response to the discussion of this issue at the hearing. This inconsistency with national policy advice adds weight to my concern about the soundness of this aspect of the CS.

3.115 Last but not least, at paragraph 63, PPS 3 requires the housing implementation strategy to indicate what range of housing delivery performance is acceptable, and what action may be taken in what circumstances so that there are clear and transparent points that will trigger management action. Once again, the CS as submitted is silent on this matter, as are the emerging DPDs.

3.116 In response to the discussion at the hearing, the Council proposed a change to specify the acceptable range of delivery against target over a specified period of time, and the circumstances which will trigger a review of policies. This change is not specific to housing delivery, but intended to apply generally when assessing performance against targets as part of the AMR.

3.117 PPS 3 is clear that where housing delivery performance falls outside an acceptable range of performance, the reason needs to be established and appropriate management actions taken. The Council’s proposed change IC39 does not indicate any management actions that may need to be taken in such circumstances, other than a review of policy. PPS 12 advises that authorities should not necessarily rely on a review of a plan as a means of handling uncertainty. Given the timescale involved in undertaking a policy review, relying on this approach might delay rather than address deliverability.

3.118 For these reasons, I find the Council’s proposed change unduly restrictive, and have amended proposed wording in change IC39 to allow for alternative strategies or management actions to be considered as appropriate, in addition to policy review. However, I have not indicated what these strategies or actions might involve, as this is a matter for the Council to determine in the light of local circumstances. The proposed change, as amended, would give the Council a wider range of options to take action if it appears that delivery might fall outside the accepted range of performance.
However, the fact that the CS does not identify any management actions to support housing delivery in such circumstances remains a cause for concern.

3.119 In summary, I consider that the Council’s suggested changes (with amendments as noted) will go a long way towards making the plan consistent with PPS 3 requirements. However, in the absence of the key elements I have identified, I am unable to find the CS approach consistent with national policy in these respects.

3.120 I have given considerable thought to whether the CS examination should be extended or suspended again, to allow the Council to produce a dedicated housing implementation strategy which covers all the requirements set out in PPS 3 paragraphs 62-67, in a comprehensive, transparent and systematic manner. However, this additional work would delay adoption. Given the considerable challenges facing the borough, I think it important to have the CS in place as soon as possible. I am mindful that the Council intends to produce a Supplementary Planning Document (SPD) on housing as a priority (along with a planning obligations SPD). If the housing implementation strategy were to part of the SPD (indeed, it may be the Council’s intention to do this), this would address my concern.

3.121 I am mindful that significantly higher housing targets are likely to be set when the replacement London Plan is published, and the Council has already identified the risk of a potential shortfall in delivery against these higher targets if the economic recession leads to extended delivery timescales. This highlights the importance of a robust housing implementation strategy.

3.122 I therefore believe the best way forward is to incorporate the changes set out in IC38 and IC39, and add a sentence to paragraph 5.2 to the effect that the Council will set out its approach to managing housing delivery in the proposed housing SPD, as set out in change IC37.

3.123 In order to make CS sound, it should incorporate the changes set out in IC37, IC38 and IC39 to make clear how the Council will implement the CS housing strategy.

3.124 Issue 5 Density

Does Policy IS 3 c provide scope for the London Plan Density Matrix to be applied flexibly in locations where major changes are proposed in the area’s character and public transport accessibility?

3.125 The London Plan Density Matrix categorises areas by “setting”—suburban, urban and central—according to location, existing built form and massing. A density range considered appropriate for each type of setting is specified according to Public Transport Accessibility Levels (PTAL). Whilst acknowledging the limitations of the London Plan Density Matrix, the text supporting Policy IS 3 c supports the general approach as a way to achieve the highest possible intensity of use compatible with the local context. This is reflected in the Policy IS 3 c.
3.126 This approach supports the Council’s aim to protect and reinforce the borough’s existing varied character and heritage. However, it could create a tension in areas where major change is proposed, such as the Opportunity Area. At present, the VNEBOA is characterised by an impoverished appearance, poor quality buildings, under-utilized land and poor permeability. Rather than protecting and reinforcing this townscape character, the CS seeks to create a new urban quarter, with high quality buildings and streetscapes. To achieve this aim, the scale and density of new development in the Opportunity Area will inevitably be considerably higher than the range specified in London Plan matrix based on the area’s existing “setting,” even if proposed improvements to public transport accessibility are taken into account.

3.127 To reconcile this potential conflict and support the delivery of regeneration objectives in the VNEBOA, the Council suggested changes to both the supporting text and Policy IS 3 c. These changes highlight the distinction between the Opportunity Area where a new urban setting will be created, and elsewhere in the borough where the effective use of land should not harm the existing character of the area. To deliver regeneration objectives in the Opportunity Area, changes IC18 and IC19 are necessary to make the plan sound.

3.128 In order to make CS sound, Policy IS 3 c should be amended in accordance with change IC19

3.129 The text supporting Policy IS 3 c should be amended in accordance with change IC18 in order to clarify the intended application of Policy IC 3 c

3.130 Issue 6 Tall buildings

Is the identification of locations where tall buildings may be considered appropriate under Policy IS 3 d justified by robust evidence relating to the local context; is it consistent with the management and protection of strategic views, including the Palace of Westminster World Heritage Site, and will it be effective?

3.131 As submitted, Policy IS 3 d indicates that tall buildings may be appropriate in locations well served by public transport, such as town centres and Nine Elms, or at other defined focal points of activity, provided they can justify themselves in terms of regeneration, townscape and public realm benefits.

3.132 Paragraph 4.132 highlights a range of potential benefits associated with tall buildings, including townscape benefits such as creating attractive landmarks and adding definition to the skyline (provided important views and skylines are not harmed). However, it was unclear from my initial examination of the evidence whether such townscape matters, or indeed other urban design considerations such as the wider historic context and the character of the immediate area, had been taken into account when identifying locations where tall buildings may be appropriate.

3.133 Some of the locations identified include sensitive historic areas and buildings, whilst the height of development in the Vauxhall area
impacts on a strategically important view of the Palace of Westminster World Heritage site from Hungerford Bridge. These considerations reinforced my concern about the apparent lack of evidence underpinning the Council’s tall buildings strategy.

3.134 Good practice guidance on tall buildings\textsuperscript{4} supports a plan-led approach to identifying appropriate locations for tall buildings and recommends that in identifying such locations, local planning authorities should, as a matter of good practice, carry out a detailed urban design study. However, whilst government endorsed, this guidance is not part of the suite of national policy and guidance documents issued by the Secretary of State to which DPDs must have regard. The urban design study approach recommended in the guidance is only one way to gather information to support a tall buildings policy, or identify areas appropriate, sensitive or not appropriate for tall buildings. Other material may contain similar information on which strategic policy decisions can be based.

3.135 In response to my question, the Council clarified that although it had not undertaken a one-off urban design study to feed into the tall buildings policy, Policy IS 3 d had nevertheless been informed by a wide range of published material covering much of the ground specified in the good practice guidance. These documents included the London View Management Framework Supplementary Planning Guidance (SPG) and the borough’s own SPG on Important Local Views. Development briefs for individual riverside sites, the Urban Design Framework for the Wandle Delta and Guidelines for Thames Riverside Development underpin the identification of existing and proposed riverside focal points of activity as areas where tall buildings may be appropriate.

3.136 The historic town centres at Wandsworth and Clapham Junction both have up-to-date Conservation Area Character Appraisals. The boundaries of the smaller town centres at Putney, Balham and Tooting adjoin or overlap neighbouring conservation areas and have been evaluated for possible designation. I agree that these studies demonstrate an understanding of the historic context.

3.137 All these documents were drawn together in the Stage 1 Urban Design Statement-Tall Buildings, added to the evidence base in September 2009. In general terms, the range of material feeding into this “high level” document indicates that the Council has understood and evaluated the key features which define the varied character and heritage of the borough, as required by PPS 1. I can establish a clear link between evidence referenced in this study and the selection of existing and proposed riverside focal points and Vauxhall as locations where tall buildings may be appropriate.

3.138 I understand why town centres are also identified as locations where tall buildings might be appropriate based on their status/function in the urban context, public transport accessibility and the need for high intensity development to fund infrastructure projects and secure regeneration objectives. However, the Stage 1 Study analysis highlights the sensitivity of town centre built heritage to tall building development. None of the documents referred to in the

\textsuperscript{4} Guidance on tall buildings July 2007 English Heritage and CABE
Stage 1 Study consider whether town centres may be appropriate locations for tall buildings having regard to local distinctiveness, historic built character and overall townscape. I have therefore looked to see whether such evidence can be found in the Stage 2 Urban Design Study: Tall Buildings, published in December 2009 and subsequently added to the evidence base.

3.139 This draft document contains detailed studies of areas identified in Policy IS 3 d as locations where tall buildings may be appropriate, including all the borough’s town centres. Each area study describes the locality, explains the policy context and discusses transport and development opportunities. A detailed urban characterisation study covers the key points identified in the tall buildings good practice guidance. Each area study culminates in a detailed assessment of the opportunities and constraints for tall buildings, setting out the form of development considered appropriate for the area in the light of the earlier characterisation. Area studies are supported by maps indicating the height at which a building will be considered “tall” in the context of its surroundings, and the height at which buildings are unlikely to be considered acceptable, other than in exceptional circumstances.

3.140 I acknowledge that the Stage 2 Urban Design Study is in draft at present, and is intended to provide the evidence base for lower level DPDs covering site allocations and development management, rather than the CS. However, in general terms, it provides the type and level of analysis I would expect to see as evidence supporting a CS policy identifying areas where tall buildings may be appropriate. Taken in conjunction with the Stage 1 Urban Design Statement, I consider this material provides a robust and creditable evidence base to support the CS tall buildings strategy.

3.141 In the light of the evidence described above, I turn now to the wording of the policy and supporting text, which was the subject of a considerable number of representations at various stages before and during the examination, and lively discussion at the hearing. Some of the concerns expressed appear to stem from a lack of clarity about the staged approach used to develop the tall buildings strategy i.e. The CS identifies “areas of search or potential” (to quote the Council’s statement) for tall buildings, based on the evidence drawn together in the Stage 1 study; these broad areas of search are to be refined using locational guidance set out in the Stage 2 study, and specific sites considered suitable for tall buildings will be identified in the SSAD.

3.142 As submitted, neither Policy IS 3 d nor the supporting text clearly convey this staged approach, or highlight that some of the broad areas identified as locations where tall buildings may be appropriate are also sensitive in terms of their built heritage. In my view, this caveat needs to be set out clearly in both the policy and supporting text in order to properly manage the expectations of those considering schemes for tall buildings in the locations identified.

3.143 Planning Policy Statement 5 Planning for the Historic Environment (PPS 5) highlights the need to integrate consideration of the historic environment into planning policies, promoting place-shaping. In the light of this advice, I consider that a requirement for tall buildings to respect the historic environment should be woven into
the qualifications embodied in Policy IS 3 d, alongside the recognition that tall buildings have potential benefits in terms of regeneration, townscape and the public realm. This will convey more clearly the Council’s balanced approach to assessing proposals for tall buildings in the areas identified.

3.144 The Stage 1 Urban Design Study states that selecting a limited number of areas where tall buildings may bring an acceptable balance of positive change, will send a clear message that tall buildings are not considered appropriate across the great majority of the borough. In my view, this needs to be spelt out in the supporting text and policy itself, rather than assuming that readers will recognise the implicit message in the policy.

3.145 In the policy as drafted, there is some ambiguity about whether tall buildings may be considered appropriate in all locations well served by public transport, not just those within a defined town centre, Vauxhall, or focal point of activity. As all the areas identified are, or will be, well served by public transport, I see no need to refer to “areas well served by public transport”. In my view, unless this reference is deleted, false hopes may be raised that tall buildings are likely to be considered appropriate on sites with a good PTAL rating but located outside the areas identified. In this context, I think it would be helpful to name the “defined focal points of activity” in the policy, rather than expect the reader to search place-based policies in order to establish their whereabouts.

3.146 Circular 07/2009 advises that it may be appropriate to protect the setting of World Heritage sites by protecting specific views and viewpoints. In the light of this advice (which was published after the CS was submitted for examination) I consider that Policy IS 3 ought to indicate how the Council will assess proposals for tall buildings on sites within the protected view of the World Heritage site, even though the site itself is outside the borough.

3.147 The final matter concerns how “tall building” is defined in the policy. There was general agreement at the hearing that the policy ought to refer to proposals which significantly change the skyline. I concur with this view. However, opinions were divided as to whether the definition should refer to proposals which are substantially taller than the prevailing height of surrounding buildings (as drafted) or neighbouring buildings (as proposed), or some other form of words. I am not persuaded that this nuance is critical, given the work on building heights for each specific area undertaken in the Stage 2 urban design study. It is more important, in my opinion, to draw attention to the area-based approach to defining a tall building, which is feeding into the SSAD.

3.148 Almost all of the points set out above are picked up in the various changes to Policy IS 3 d and the supporting text proposed by the Council before, during and after the hearings, following discussions with English Heritage and in response to representations received following the latest round of consultation. I have consolidated these changes into IC20 (which amends the supporting text at paragraph 4.132), IC21 (which replaces Policy IS 3 d in its entirety) and IC22 (which adds a new sub-section e to the policy in relation to views of the World Heritage Site).
The order of the Council’s suggested wording in change IC20 has been amended to move the reference to the SSAD’s role in defining the height at which buildings will be considered “tall” to the beginning of the paragraph where tall buildings are defined, rather than at the end. The reference to the Stage 1 Urban Design Statement has been amended and a reference to the Stage 2 Urban Design Study added so that the supporting text reflects the staged approach to identifying locations where tall buildings may be appropriate, as set out in the Council’s hearing statement.

There are consequential changes (IC13, IC14, IC15 and IC17) to place-based policies PL 11 d, PL 12 h, PL 13 b and PL 14 b which draw attention to the criteria-based policy on tall buildings to be included in the DMPD, and the qualifications set out in Policy IS 3. I have adjusted the order of wording in the Council’s suggested change to the latter (IC21) so that all qualifications about tall buildings are set out in together in one part of the policy and the potential benefits of tall buildings in another. The revised order reflects the balancing exercise the Council will undertake when assessing proposals for tall buildings, and will help readers to identify the qualifications in Policy IS 3 referred to in the changes proposed to place-based policies.

The Stage 2 Urban Design Study highlights that constructing tall buildings in the Falcon Lane area of Clapham Junction could have a potentially harmful impact on the residential enclave of Mossbury Road. I therefore agree with the Council’s suggested change (IC16) to delete the reference to tall buildings in Policy 13 e, on the basis that proposals for tall buildings would only be acceptable near the railway and would therefore considered in the context of Policy 13 b (Clapham Junction Station site redevelopment).

Because of the way the supporting text and policy are drafted, it is difficult to isolate minor changes endorsed in the interest of clarity, from major changes which go to the heart of soundness without undermining the overall sense of the paragraphs in question. I therefore consider the following consolidated changes to Policy IS 3 necessary to make the plan sound, together with changes to the place-based Policies PL 11 d, PL 12 h, PL 13 b and e and PL 14 b iv which draw attention to the qualifications set out in Policy IS 3 and the criteria based policy on tall buildings in the DMPD.

IC20 amends paragraph 4.132 to explain how tall buildings are defined; clarifies the staged approach to identifying areas where tall buildings may be appropriate; highlights that some sites within the areas identified will be sensitive to, or not appropriate for, tall buildings and that outside these areas tall buildings are likely to be considered inappropriate; names the focal points of activity.

IC21 replaces Policy IS 3 d, and incorporates the points set out in IC20.

IC22 adds a new sub-section e to the policy in relation to protected views of the Palace of Westminster World Heritage Site.
**Issue 7 The Opportunity Area**

*Does the Core Strategy provide a clear framework for delivering the regeneration of Vauxhall Nine Elms Battersea Opportunity Area (VNEBOA)??*

3.159 Policy PL 11 outlines the broad strategic approach to regeneration in the VNEBOA. It specifies targets for homes and jobs based on the indicative employment capacity and minimum number of homes stated in the adopted London Plan. The policy sets out the CS vision for different parts of the Opportunity Area: a dynamic mixed use quarter, including local shops and services, around Battersea Power Station; high density mixed use development around Vauxhall; a strategic reservoir of employment land for industry and waste management in the Stewarts Road/Silverthorne Road area; the retention, consolidation and intensification of the wholesale market and the development of a food hub within the New Covent Garden Market site, and residential-led mixed use development to the south of Nine Elms Lane.

3.160 Although broad brush in its approach, in my view Policy PL 11 is sufficiently clear in its intentions to provide a strategic framework for the regeneration of the OA, when considered in conjunction with other policies in the CS, in particular PL 5 *Provision of new homes*, PL 7 *Land for industry and waste* and PL 9 *River Thames and the riverside*. In reaching this view I have taken into account that the quantum and mix of development on individual sites within the OA, including Battersea Power Station, which is acknowledged to be a key strategic site within the area, will be taken forward in the SSAD and examined independently in due course.

3.161 As it develops, the SSAD will continue to be informed by the findings of the Planning Framework (PF) being prepared jointly by the GLA, Wandsworth and Lambeth for the VNEBOA. Work on the framework commenced in January 2008; the consultation draft was published in November 2009 and the document was added to the evidence base whilst the examination was in progress. The framework is intended to develop in more detail the broad strategic approach set out in Policy PL 11.

3.162 Paragraph 4.81 of the CS states that the VNEBOAPF will guide the comprehensive redevelopment of the Opportunity Area and ensure that adequate infrastructure is available, including new public transport infrastructure. It highlights that the quantum and mix of development may need to be reviewed in the light of the emerging framework and additional public transport that is achievable.
3.163 The VNEOAPF is not part of the development plan, nor is it a Supplementary Planning Document (SPD). However, subject to the circumstances of a particular case, PPS 12 advises that such guidance might be afforded weight commensurate to SPD if the same disciplines of consultation and sustainability appraisal are applied. Even so, PPS 12 is clear that SPDs should not be prepared with the aim of avoiding examination. I have therefore considered carefully concerns that decisions about matters on which the VNEOAPF is taking the lead, such as land use, public realm and tall buildings strategies, development capacity assessment, housing and social infrastructure, transport interventions and infrastructure funding, should be dealt with as part of the CS.

3.164 The VNEBOAPF states that its role is to clarify rather than create policy, and to identify contentious issues “at an early stage in the planning process”. In an ideal world therefore, its findings would have informed the development of CS Policy PL 11, rather than being added to the evidence base whilst the examination was in progress. As it is, the CS and emerging planning framework guidance are out of sync. This is reflected in the Council’s suggested changes to Policy PL 11 and the supporting text (IC9, IC10, IC11 and IC12).

3.165 The proposed changes highlight the significant increase in the potential number of homes and jobs coming forward in the VNEBOAPF’s preferred option. They also commit the Council to review targets for the OA and the quantum and mix of development that will be permissible on completion of the work on the VNEOAPF, and take these forward in the SSAD. This will enable regeneration objectives in the OA to be delivered and progress of delivery against target to be monitored. Consequently, I consider the changes summarised below necessary to make the plan sound.

3.166 **IC9 amends the supporting text in paragraph 4.80 to indicate the potential scale of development in the OA, provides for a review of the housing and employment targets in the OA on completion of the VNEBOAPF and the inclusion of these updated targets in the Area Spatial Strategy for Queenstown Road to Nine Elms as part of the development of the SSAD**

3.167 **IC10 amends the supporting text to indicate that the quantum and mix of development that could be permissible in the OA will be reviewed in light of the emerging OAPF and the additional public transport that is achievable, and will be taken forward in the SSAD**

3.168 **IC11 and IC12 amend Policy PL 11 h and add a new criterion to the policy to embody the matters set out in changes IC9 and IC10**

3.169 PPS 12 advises that an Action Area Plan (AAP) should be used when there is a need to provide a framework for areas where significant change is envisaged. AAPs should deliver planned growth areas, stimulate regeneration and focus the delivery of area-based
initiatives, amongst other things. AAPs can assist in producing a consensus as to the right strategy for an area and how it might be implemented, provide the basis for taking compulsory purchase action where necessary, and act as a focus and catalyst for key agencies and landowners to work together. In areas of change, AAPs should identify the distribution of uses and their inter-relationships, including specific site allocations, and set out the timetable for implementation as far as practicable.

3.170 Tensions are already evident in relation to the Battersea Power Station site. This is envisaged as a centre for local shops and services in the CS; proposed as a Central Activities Zone (CAZ) frontage in the draft replacement London Plan, and being promoted by the owners of the site as a new Major Centre in response to the draft replacement London Plan. Furthermore, infrastructure funding and further work on transport will be key to delivering regeneration in the OA. In the light of such issues and the advice in PPS 12, I am surprised that the OA is not identified as a priority for AAP preparation in the Council’s LDS.

3.171 As currently drafted, it is not easy to see how the “Area Spatial Strategy” for Queenstown Road to Nine Elms coming forward as part of the SSAD will fulfill the role of a fully fledged AAP. However, I acknowledge that this lower level DPD is still at the preferred options stage. The Council’s proposed changes indicate that the SSAD will be developed further as and when the VNEBOAPF is formally adopted and published by the Mayor as supplementary guidance for the Opportunity Area. How the Council takes this forward is not before me as part of the CS examination. The critical point is that these key matters will come forward in a DPD and will therefore be subject to independent examination.

3.172 **Issue 8 Sustainable buildings**
What are the local circumstances that warrant setting a sustainable buildings target above national targets; has the effect of this requirement on the economic viability of development proposals been assessed?

3.173 Policy IS 2 encourages all new residential development to achieve at least Code 3 of the Code for Sustainable Homes and other development to meet the equivalent BREEAM’s standard. The Council’s statement confirms that this policy will be treated as a target for new development, although it will be applied flexibly.

3.174 The Planning and Climate Change Supplement to PPS 1 (paragraphs 31-33) allows Councils to set targets above national requirements, provided there are local circumstances that warrant and allow the proposed target and the effect of the proposed target on the economic viability of development proposals has been assessed.

3.175 At the hearing, the Council explained that Wandsworth has an ecological footprint which is amongst the highest in London and higher than the UK average. Housing is one of the two largest

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5 BREEAM: Building Research Establishment Environmental Assessment Method

6 An ecological footprint is a measure of how much biologically productive land and water area an individual, population or activity requires to produce all the resources it consumes and to absorb the waste it generates.
contributors to this high footprint. Improving the sustainability of new residential buildings will be a key factor in reducing this environmental impact.

3.176 The other local circumstances which warrant setting a target above the national target is surface water flooding, which is a particular problem in the borough. Sustainable drainage and water management techniques that are promoted as part of the Code for Sustainable Homes and BREEAM can help reduce the likelihood of surface water flooding events.

3.177 Based on this information and the supporting evidence produced by the Council, I am satisfied that local circumstances warrant setting a sustainable buildings target above national targets.

3.178 The additional costs of building to a higher standard were taken into account when formulating the policy and in the calculations used in the Council’s AHEVA. The policy has been a material consideration in determining planning applications since the Preferred Options Stage of the CS was published in 2007. Almost 80% of new dwellings proposed since then would meet or exceed the target, suggesting that developers are already preparing to comply with Sustainable Homes Code level 3, and that meeting this level is viable in most cases.

3.179 Based on this information, I am satisfied that the effect of this target on the economic viability of proposals has been assessed; that the Council has a track record of making potential developers aware of the requirement and is monitoring performance against this target. I am therefore satisfied that the policy is consistent with national policy requirements set out in the Planning and Climate Change Supplement to PPS 1 and no changes are required to make the plan sound in this respect.

3.180 **Issue 9 The local economy**

*Is the evidence supporting Policy PL 6 robust and up-to-date? Is the focus on employment floorspace as opposed to jobs consistent with the Council’s aim to promote the mixed use redevelopment of sites in mixed use former industrial areas? What is the evidence underpinning, and justification for, the selection and designation of employment sites as Strategic Industrial Sites (SIAs) Locally Significant Industrial Areas (LSIAs) or Mixed Use Former Industrial Employment Areas (MUFIEAs)?*

3.181 The main evidence underpinning Policy PL6 is “The Future of Employment Land and Premises in Wandsworth” published in December 2004. At the time the CS was submitted, the employment study was less than five years old. However, I was concerned that employment circumstances might have changed significantly since the study was published, bearing in mind the subsequent recession.

3.182 In response, the Council advised that a revised employment study was in progress to provide updated evidence in support of the SSAD and DMPD. After the hearings closed, I was given a report dated March 2010 setting out the study’s emerging findings. In summary, the initial borough-wide analysis in this report indicates
that adequate employment land is allocated across the borough to meet the forecast demand over the plan period.

3.183 The interim report also highlights that employment in the industrial and warehousing based sectors appears set to decline. However, whilst scaling back such operations may result in a reduced workforce, this will not necessarily translate to a decrease in the amount of floorspace occupied. It points out that over time, the stock of industrial and warehouse units will need to be replenished periodically to ensure that supply is fit for purpose. Furthermore, the supply of industrial and warehouse units has been limited in the past, and historic take-up rates indicate a demand for new units, notwithstanding declining employment in the manufacturing sector.

3.184 In the context of a shift away from manufacturing to business use, the CS proposes to meet the needs of the local economy by allowing the limited release of former industrial land for mixed use purposes (MUFIAs), whilst retaining a strategic reservoir of land for industry and waste (SIL) including logistics, warehousing and related uses, supported by locally significant industrial areas (LSIAs). In my view, the findings of the 2004 employment study and the interim update report provide a robust and up-to-date evidence base to support this approach.

3.185 The projected increase in jobs is over the plan period, particularly in the B1 use class, means that additional employment floorspace will need to be provided in the borough to meet future demand. Meanwhile, the release of employment land and associated policy de-designations of a number of former industrial employment areas will reduce the existing stock of employment land and premises.

3.186 The CS has to find a way to compensate for the reduction in existing employment floorspace on the one hand, and to accommodate the growth in employment anticipated over the plan period on the other hand. It does this by requiring the provision of net employment floorspace equivalent to at least the existing floorspace in mixed use schemes on redevelopment sites in former industrial areas (Policy PL6 a i).

3.187 Some critics of this requirement point out that B1 business uses have a higher employee-to-floorspace ratio than the industrial, distribution and warehouse uses which currently occupy land in MUFIAs. Therefore the employment level on a particular site is bound to increase as land hungry activities change to more intensive uses, without requiring employment floorspace to be replaced on a like-for-like basis.

3.188 However, the Council argues that if the policy were based on like-for-like jobs, insufficient land would be made available in MUFIAs to maximise the locational needs of small business for the present and future, and meet the employment needs of the borough as whole. I have not read or heard any evidence of sufficient weight to persuade me otherwise. Consequently, I am satisfied that this requirement is justified and therefore no change is necessary to make this part of Policy PL 6 a i sound.

3.189 I acknowledge concerns that there may not be sufficient demand from B1 uses to make the provision of equivalent floorspace viable
in some MUFIEAs. However, the preferred options version of the DMPD sets out a wide range of employment uses encompassing classes A, B, C and D which the Council considers appropriate in MUFIEAs, depending on whether they are located in town centres, identified focal points of activity, or elsewhere. This flexibility in how the policy will be applied reinforces my view that the strategic approach in Policy PL6 a is deliverable.

3.190 The Council’s statement clarifies that designation of SILs, LSIAs and MUFIEAs is underpinned by the London Plan and advice from the GLA, as well as the Employment Land Study. The 2008 London Plan de-designated parts of the Nine Elms Preferred Industrial Location (PIL) in order to achieve the aims of the Opportunity Area. Businesses currently operating in these areas will relocate to alternative SILs in London. The remaining SILs at Summerstown and Stewarts Road have been retained as strategic industrial locations in conformity with the London Plan.

3.191 The Employment Land Study recommended that the Ram Brewery and Wandsworth Business Park sites, formerly within the Wandsworth Industrial Employment Area (IEA) as designated in the UDP, be re-designated as MUFIEAs because of their location on the edge of Wandsworth town centre and scope they offer to provide the type of small office/workshop units required to meet the needs of the borough’s growth sectors.

3.192 Although not recommended for de-designation in the Employment Study, given the identified need for flexible business floorspace, the CS proposes that other areas previously covered by IEA designation are also designated MUFIEAs. These areas were selected based on development potential and location associated other regeneration priorities in and adjacent to Wandsworth town centre and the Thames Riverside. One site at Trewint Street was de-designated because of its small size. The remaining areas covered by the IEA designation in the UDP are designated as LSIAs. These are retained in the CS as part of the strategic reserve of industrial land to compensate for the loss of industrial land at Nine Elms and to allow land in SILs to be safeguarded for waste management purposes.

3.193 I consider this to be a balanced approach which will provide adequate stock of land to meet future needs and functional requirements of different types of employment floorspace. The strategy is underpinned by robust evidence which, in my view, justifies the different types of designation and the basis on which sites were selected for these designations. I therefore find the plan sound in these respects. Having reached the view that Policy PL 6 is sound without a requirement to change the Proposals Map in a particular way, I note but take no further action on representations which seek to change the employment designations of certain sites.

3.194 **Issue 10 Transport**

*Given the strategic aim to improve the local environment (including transport) should CS Transport Policy PL3 include references to freight transport, delivery and servicing?*

3.195 One of the Community Strategy’s aims is to improve the local environment, including transport. The CS highlights that whilst road traffic congestion is a problem in all London boroughs, it is a
major issue in Wandsworth. Highways carrying heavy traffic cut across neighbourhoods, endanger pedestrians and cyclists, cause travel delays, produce air pollution, are hazardous to health and contribute to global warming.

3.196 Policy PL 3 sets out the strategic approach to all modes of public transport and related infrastructure, and to cycling and walking. It includes a cross-reference to Policy IS 1 specifically in relation to car and cycle parking. The supporting text refers to rail and water as being the preferred mode of transport for freight and advises that servicing should be off-street where possible, subject to townscape considerations. However, there is no reference to freight transport, delivery or servicing in Policy PL 3 as drafted. Furthermore, there is no cross reference to Policy PL 9 which promotes the use of the river as a means of transport for river bus services and the transhipment of freight.

3.197 At the hearing, the Council proposed to amend Policy IC 1 c to signpost that details of servicing and delivery requirements will be set out the DMPD, alongside parking standards. I consider this to be a minor change which adds clarity to the plan. More significant in my view, is the Council’s suggested change to Policy PL 3 which replaces sub section “g” with new wording to address the shortcomings identified above, and include cross-references to Policy PL 9 in relation to river bus services and Policy IS 1 in respect of the movement of bulk freight by rail and water (IC1).

3.198 I have considered carefully whether to treat IC1 as a minor change. However, the means by which freight is transported and the use of the Thames as a transport route for both freight and passengers are key parts of any transport policy, especially in Wandsworth given the problems associated with heavily congested highways. They are also matters whose significance extends beyond the borough boundary. This leads me to the view that this change is necessary to make the plan sound.

3.199 In order to make CS sound, Policy PL 3 g should be deleted and replaced by the words set out in change IC1

3.200 Issue 11 Sustainable waste management

Does the CS set out the key elements of the waste planning framework for the area; is it clear how strategic objectives for the area and key planning objectives in PPS 10 will be delivered, including the movement of waste up the waste hierarchy?

3.201 Although unclear from the CS as submitted and the evidence available at that time, at the hearing the Council confirmed that the London Borough of Wandsworth is the waste planning authority for the area. The borough has a Municipal Waste Management Strategy which was produced jointly with other local authorities (Hammersmith and Fulham, Kensington and Chelsea, and Lambeth) and the Western Riverside Waste Authority, collectively known as the Riverside Partnership. The Municipal Waste Management Strategy was added to the evidence base during the examination.
3.202 As there is no intention to produce a separate waste DPD alone or in conjunction with the Riverside Partnership, the CS therefore provides the waste planning framework for the borough (there being no mineral deposits in Wandsworth).

3.203 Whilst the supporting text focuses on the land required to meet the waste apportionment figure set by the GLA, nevertheless, the spatial vision for the future pattern of waste management is evident in Policy PL 7. In summary, this safeguards all existing waste management and other waste sites in the borough, including wharves, until such time as compensatory provision is made in appropriate locations. Safeguarded wharves are shown on the Proposals Map, as required by the EU Waste Directive Framework7.

3.204 The SSAD will identify appropriately located sites for waste management and related facilities to provide the capacity to meet the borough’s waste apportionment figure, as set out in the London Plan. The policy identifies general size requirements and broad areas of search for such sites, as well as the borough-based criteria to be taken into account in site selection and a reference to the locational criteria set out in Annex E of Planning Policy Statement 10 Planning for Sustainable Waste Management (PPS 10). I consider these requirements sufficient to assess whether a particular site/proposal is consistent with the waste strategy, in accordance with the Waste Framework Directive.

3.205 There is a statutory requirement for waste planning authorities to have regard to the waste hierarchy as part of the plan-making process. This includes the prevention or reduction of waste production, the recovery of waste and its use as an energy source. The text supporting PL 7 clarifies that waste management includes energy recovery and gives examples of various types of recovery processes. However, there is no mention of how the prevention or reduction of waste will be addressed in the either the CS or other DPD, or as part of the Municipal Waste Management Strategy.

3.206 In response to my questions and the discussion at the hearing, the Council proposed various changes to Policy PL 7 and the supporting text. IC4 clarifies that the London Plan apportionment figure will be used to estimate the approximate land capacity needed to provide waste management facilities. IC5 states the Council’s preference to move waste up the waste hierarchy. IC6 clarifies that the Council is the waste planning authority; refers to the Municipal Waste Management Strategy and confirms that the CS, SSAD and DMPD are the spatial delivery tool to implement the Municipal Waste Management Strategy.

3.207 IC7 corrects figures in the supporting text relating to the amount of land available at existing waste sites in SILs which could be re-orientated to provide waste management, and the notional waste capacity that this amount of land could process. It also states that a review of land to meet the apportionment figure will be undertaken following the publication of any replacement London Plan. IC8 signals that the DMPD will include policies relating to the provision of on-site waste and recycling facilities.

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7 European Community (EC) Directive 2006/12/EC
3.208 The revised Infrastructure Delivery Table (Appendix 1 to Annex A) sets out a monitoring and implementation framework for sustainable waste management, with targets and indicators to monitor the implementation of the waste strategy and the performance of waste policies. The Council’s statement drew my attention to Core Output Indicator W2 *Amount of municipal waste arising and managed by management type*. I have added this as an Indicator for Policy PL7.

3.209 Taken together, these changes will make the plan consistent with national guidance on sustainable waste management as set out in PPS 10, and are therefore necessary to make the plan sound.

3.210 **In order to make CS sound, amend Policy PL 7 b in accordance with IC8**

3.211 **Amend paragraphs 4.56 and 4.57 in the supporting text in accordance with IC4, IC5, IC6 and IC7 order to better clarify the application of Policy PL 7 b in respect of sustainable waste management**

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**Issue 12 Infrastructure planning, delivery and monitoring**

*Does the core strategy have a clear delivery strategy which identifies physical, social and green infrastructure requirements (including the infrastructure requirements for strategic sites), along with responsibility for, and the timing of, the provision of such infrastructure? Is it clear about which elements of infrastructure are critical to the strategy, and whether there is a reasonable prospect of this being provided in the timescale required, having regard to funding? Does the delivery strategy contain clear targets and/or measurable outcomes to assist monitoring of progress on individual policies and are the triggers for contingency plans clearly identified?*

3.212 Physical, social and green infrastructure requirements are identified as an integral part of the CS, in both the text supporting policies and within policies themselves, where appropriate. It is evident that these requirements have been identified in discussion with key infrastructure providers such as Transport for London (TfL), Network Rail and the Train Operating Companies, Thames Water, the Environment Agency, Port of London Authority, the Primary Care Trust and Metropolitan Police.

3.213 The revised Infrastructure Delivery Table (Appendix 1 to Annex A) sets out the key infrastructure requirements associated with each policy; details the works envisaged; the costs of these works (where known); the timescale for delivery and the agency/agencies responsible, together with arrangements for funding. Where the delivery of infrastructure projects is related to planning obligations and/or CIL contributions, this is made clear under “Funding Arrangements.” Ongoing work underpinning infrastructure delivery and other information relevant to progress is set out in a separate comments column.

3.214 Infrastructure projects which are fundamental to the delivery of the strategy are identified in the CS policies for the areas of greatest
change. Improvements to the transport network, and public transport in particular, will be critical to accommodate growth in these areas. Another critical issue is the provision of schools and social infrastructure particularly in Nine Elms and the adjoining area in north east Battersea.

3.215 Measures are already in place to improve the capacity of rail services serving the town centres at Clapham Junction, Wandsworth and Putney. As noted in Issue 7, a detailed Infrastructure Funding Study is currently in progress as part of the OAPF and a separate funding feasibility work is currently being undertaken by TfL and major developers. The borough has already been allocated a significant level of funding for school place provision through the Building Schools for the Future programme.

3.216 The CS acknowledges that much of the new development, including transport and infrastructure provision in areas of major change, will be funded by the private sector. Policy IS 7 states that planning obligations will be used on a site-by-site basis to secure affordable housing and ensure that development proposals provide or fund local improvements to mitigate the impact of development and/or provide additional facilities made necessary by the development, subject to the tests in Circular 05/2005 Planning Obligations.

3.217 Policy IS 7 also signals the intention to develop a charging schedule to support the implementation of infrastructure projects once the Community Infrastructure Levy (CIL) regulations come into effect. These regulations were laid before Parliament whilst the hearings were in progress and came into effect on 6 April 2010.

3.218 At present the Council has no adopted guidance setting out its approach to planning obligations. As drafted, there is no reference in Policy IS 7 or the text to the production of a supplementary planning document (SPD) to support this policy. The Council’s statement explains that this was due to uncertainty at the time the CS was submitted around what the CIL regulations and associated changes to planning obligations would allow.

3.219 At the hearing, the Council confirmed its intention to proceed with a joint Planning Obligations SPD/CIL charging schedule as a priority, and this is signalled in changes IC35 and IC36. I am advised that the SPD will set out the need for infrastructure in different areas and the likelihood of a contribution being required. It will also include guidance on the impacts likely to be created by developments and the nature and scale of measures which may be required to address these impacts, as well as factors to be taken into account when considering the scale and form of contributions.

3.220 The SSAD will set out infrastructure requirements for individual sites. Where relevant, the Council intends to tie the implementation of major schemes, such as those at Battersea Power Station and the Ram Brewery, to the provision of infrastructure by using Grampian planning conditions.

3.221 Taking these matters into account, I think there is a reasonable prospect that funding will be secured and key infrastructure will be put in place in the timescales identified.
3.222 As proposed to be changed in IC40, the Infrastructure Delivery Table identifies the AMR Indicators which will be used to assess the effectiveness of each policy and to measure progress of delivery against targets. As noted in Issue 1, change IC39 sets out the acceptable range of performance against target over a specified time. This approach will give clear and transparent points to trigger a policy review, consideration of alternative strategies and/or other management actions.

3.223 Given the key role of planning obligations and CIL to secure funding for the delivery of infrastructure and the need for an up-to-date, comprehensive Infrastructure Delivery Table to identify infrastructure requirements and enable delivery to be monitored, the following changes are necessary to make the plan sound:

3.224 IC35 and IC36 replace paragraph 4.161 in the supporting text and sub-section b of Policy IS 7 to refer to the production of an SPD on Planning Obligations and associated CIL charging schedule to support the provision of infrastructure projects.

3.225 IC39 defines the limits of an acceptable range of performance against target.

3.226 IC40 replaces the Infrastructure Delivery Table in Appendix 1 to the CS with the Infrastructure Delivery Table in Appendix 1 to Annex A.

Minor Changes

3.227 In the introduction to this report I referred to minor changes proposed by the Council. As noted at paragraph 3.10 and at other points in the report, I have reached the view that some of these changes are necessary to make the plan sound and have moved them to Annex A to recognise that fact. The remaining changes set out in Annex B are proposed in order to clarify, correct and update various parts of the text. They also incorporate changes agreed between the Council, NHS Wandsworth and NHS Healthy Urban Development Unit as set out in the Statement of Common Ground tabled during the examination. Although these changes do not address key aspects of soundness, I endorse them on a general basis in the interests of clarity and accuracy.

4 Overall Conclusions

4.1 I conclude that, with the amendments I recommend, the Wandsworth Core Planning Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the tests of soundness in PPS12.

Linda Wride
INSPECTOR
Annex A

SCHEDULE 1 - SIGNIFICANT CHANGES

The changes contained in this schedule are considered to be significant; either necessary to make the plan sound or of a nature that has required public consultation.

The changes below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the change in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text.

<table>
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<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
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| IC1       | 31   | PL 3 g           | *Delete policy and replace with:*  
|           |      |                  | Sustainable development, as referred to in Policy IS 1, will be supported through the management of freight, servicing and parking, and the use of Transport Assessments, travel plans and the use of the river (see also Policy PL9). |
| IC2       | 38   | 4.36             | *At the end of paragraph 4.36 insert:*  
|           |      |                  | Work on the SHLAA 2009 has indicated that the revision of the London Plan will lead to a significant increase in the housing targets for the borough. The implications of higher targets for the delivery and implementation of the Core Strategy were explored in the review of the Housing Capacity Assessment undertaken in August 2009. Changes to the formally published borough level targets will be reflected in the Housing Trajectory to be included in the Site Specific Allocations Document and progress in meeting the targets will be reviewed in future Annual Monitoring Reports. A review of the housing targets in the Core Strategy will be undertaken following the publication of the replacement London Plan, which is expected by the end of 2011. |
| IC3       | 39   | PL 5             | *Add the end of the Policy add*  
|           |      |                  | A review of the Core Strategy housing targets will be undertaken following the publication of any replacement London Plan which sets significantly higher housing targets during the plan period. |
| IC4       | 45-46| 4.56             | *First sentence:*  
|           |      |                  | ...waste apportionment figure within the London Plan for waste to be managed...  
|           |      |                  | *Add a new sentence after third sentence:*  
|           |      |                  | This apportionment figure will be used as the basis of our evidence in estimating the approximate land capacity needed to provide waste management facilities to meet the apportionment figure.  
| IC5       | 46   | 4.56             | *Insert at the end of the paragraph:*  
|           |      |                  | In accordance with PPS 10 – Planning for Sustainable Waste Management, there will be a preference for reducing the impact of waste management by promoting the waste... |
hierarchy. More sustainable waste management moves the management of waste up the waste hierarchy of reduction, reuse, recycling and composting, using waste as a source of energy, with disposal of waste as a last resort.

IC6 46 4.57

Add new paragraph after 4.57 (new 4.58):
The Council is the waste planning authority for the borough and supports the Municipal Waste Management Strategy developed in partnership with the Western Riverside Waste Authority and its constituent boroughs. The Core Strategy, the Site Specific Allocations Document and the Development Management Policies Document provide the spatial delivery tools to implement the Municipal Waste Management Strategy; a key element of which is the safeguarding of the existing wharves to allow for the transfer of waste as identified in Policy PL 7.

IC7 46 4.57

Sites dealing in waste services currently occupy over 8 ha of land in the borough, with the majority of this land located in the Strategic Industrial Locations, but Of this area only 0.8 ha of this is currently used for waste management purposes, and this land is assumed to process 64,000 tonnes under the GLA’s advisory figure. The proposed Materials Recycling Facility (MRF) at Western Riverside Waste Transfer Station will occupy a further 0.65 ha of land and process over 84,000 tonnes of recyclable material. On the basis of this figure it is likely that the amount of land required to meet the apportionment figure will reduce as further efficiencies in the processing of waste are introduced. Nevertheless, at present land to process a further 341,000 tonnes is currently required to meet the apportionment figure, which at the GLA’s ratio of 80,000 tonnes per ha equates to 4.26 ha. Safeguarding for future waste management purposes the Western Riverside Waste Transfer Station at Wandsworth, already a safeguarded wharf, will provide a further 1.83 ha (excluding the MRF), which together with safeguarding other existing sites dealing with waste services but which could be re-oriented to provide waste management capacity within the SILs gives a total of 3.79-2.51 ha, sufficient to process 303,200-200,800 tonnes under the GLA’s figure. This would indicate a shortfall of 0.47-1.75 ha or 37,800-140,200 tonnes to meet the overall apportionment figure. However there is sufficient land to make up this shortfall within the SILs, which cover approximately 53 ha of land, based on a historical analysis of the availability of sites. Over the period 2002 to 2008, 11 sites over 0.3 ha totalling over 17 ha have come on the market, changed hands or been subject to development proposals within these areas. In particular surveys show that over the period 2004 to 2006 there has been around 30% turnover of units within the north-east Battersea SIL. Continuation of these trends will ensure that enough suitable sites are potentially available within the employment land reservoir. Within these areas appropriate developments for manufacturing related to recycled waste will be supported, and the Site Specific Allocations Document will identify the sites needed to meet
the current shortfall. A review of the land required to meet the apportionment figure will be undertaken following the publication of any replacement London Plan.

Add part (iv) as follows:

The Development Management Policies Document will include policy on the requirement to provide waste and recycling facilities on individual sites.

IC9 60 4.80 ...

... The London Plan identifies the area as part of the Vauxhall/Nine Elms/Battersea (VNEB) Opportunity Area (including part of Vauxhall in Lambeth) within the Central Activities Zone (CAZ), with scope for intensification and the potential capacity to provide at least 8,000 jobs and 3,500 homes by 2026, with potential for 20,000 jobs and 10,000 homes or more dependent on the provision of related infrastructure. The targets for the area will be reviewed following the completion of the work on the VNEB Opportunity Area Planning Framework (OAPF), including the Development Infrastructure Funding Study (DIFS), with updated targets being included in the Area Spatial Strategy for Queenstown Road to Nine Elms as part of the development of the Site Specific Allocations Document...

IC10 60 4.81 This area will be the focus for considerable new development in the medium to long term. The key will be provision of adequate access both to and within the area. The Core Strategy outlines the broad strategic approach to how this will be achieved. This will be developed in more detail by an Opportunity Area Planning Framework (in the VNEB OAPF) being prepared jointly by Wandsworth, the GLA and Lambeth, which aims to guide the comprehensive redevelopment of the whole area and to ensure that adequate infrastructure is available, including new public transport infrastructure. The quantum and mix of development that could be permissible will need to be reviewed in light of the emerging OAPF and the additional public transport that is achievable, and will be taken forward in the Site Specific Allocations Document. Development in the Vauxhall/Nine Elms/Battersea Opportunity Area (including part of Vauxhall in Lambeth) within the Central Activities Zone (CAZ) should aim to meet targets in the London Plan of at least 8,000 jobs and 3,500 homes by 2026. At least 1,500 homes should be provided in the Wandsworth part of the Opportunity Area by 2016/17, with the potential for a further 8,500 homes or more in the longer term dependent on the provision of any necessary infrastructure. The future targets for the Opportunity Area will be reviewed as part of the work on the Opportunity Area Planning Framework and will be taken into account in the Site Specific Allocations Document.

Add new criterion i:

Further details on the quantum and mix of development in the Nine Elms area, recognising the potential of the area within the CAZ, and the associated infrastructure requirements, will be provided in the Site Specific Allocations Document including the Area Spatial Strategy...
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<th>Policy/Paragraph</th>
<th>Suggested Change</th>
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<tr>
<td>IC13</td>
<td>63</td>
<td>PL 11 d</td>
<td>High density mixed use development will be promoted around Vauxhall to help create a sense of place and improve the centre including improving local shops and services. Improvements to public transport will be sought. Tall buildings may be appropriate in this area in line with subject to the qualifications set out in Policy IS 3 and the criteria based policy on tall buildings to be included in the Development Management Policies Document.</td>
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<tr>
<td>IC14</td>
<td>69</td>
<td>PL 12 h</td>
<td>The heritage core of the town centre will be safeguarded, protecting the Conservation Area from any possible harmful development, by ensuring that new development at the Ram Brewery, Southside Centre and within the Hardwicks Square quarter will be set away from listed and other sensitive High Street buildings. A new library is to be provided in the heart of the town centre at the Old Court House. Higher buildings reflecting the status of the town centre while respecting existing landmark buildings may be appropriate on some sites, such as at the northern end of the Ram Brewery Site subject to qualifications set out in Policy IS 3 and the criteria based policy on tall buildings to be included in the Development Management Policies Document.</td>
</tr>
<tr>
<td>IC15</td>
<td>73</td>
<td>PL 13 b</td>
<td>A comprehensive retail and residential led mixed-use redevelopment of the station approach shopping centre and the adjoining land bounded by St John’s Hill and Falcon Road could enable substantial improvements to take place to the station and access to it, which are a priority for planning gain objectives. Public realm improvements will also need to be provided. The provision of new retail floorspace will help integrate the area better into the town centre and strengthen its retail function. New residential accommodation will help meet housing targets in a highly accessible location. Development at Clapham Junction and other sites in and around the town centre should aim to meet targets of at least 500 homes in the medium term rising to 1,500 with the development of all identified sites by 2023, with up to 30,000 sq ms of employment space. Other appropriate uses in this highly accessible location include offices, hotel, cultural, leisure and entertainment. A high quality street frontage can be created around the existing station entrance in St John’s Hill, building upon the established urban grain of the town centre. Taller buildings could not only help deliver significant regeneration benefits but also give a visual focus to the town centre, subject to qualifications set out in Policy IS 3 and the criteria based policy on tall buildings to be included in the Development Management Policies Document.</td>
</tr>
<tr>
<td>IC16</td>
<td>73</td>
<td>PL 13 e</td>
<td>The area around Falcon Lane should be restructured to secure an extension to the town centre in a compact and sustainable form consistent with the distinctiveness of Clapham Junction. This should take the form of a mixed-use development with good quality streets. Additional new housing can be provided in higher density mixed use</td>
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<tr>
<td>IC17</td>
<td>78</td>
<td>PL 14 b iv.</td>
<td>Suggested Change redeveloped of low density retail facilities on the north side of the town centre on or close to Lavender Hill, to include enhanced retail provision where appropriate. Taller buildings in this location could be justified due to the proximity of Clapham Junction station and its accessibility to high frequency public transport. New public space should be provided within any redevelopment.</td>
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<tr>
<td>IC18</td>
<td>88</td>
<td>4.131</td>
<td>Insert following text before last sentence: Proposals for Tall buildings would need to demonstrate how they would bring significant benefits to the quality of the townscap and the quality of the public realm, in line with the criteria for high buildings set out at may be appropriate in the town centre subject to the qualifications set out in Policy IS 3 and the criteria based policy on tall buildings to be included in the Development Management Policies Document.</td>
</tr>
<tr>
<td>IC19</td>
<td>89</td>
<td>IS 3 c</td>
<td>Throughout the borough, with the exception of the major development sites within the VNEB Opportunity Area, subject to the provision of the necessary infrastructure to support the redevelopment of the area, there is scope to create a new community in a high quality urban setting. Within this area there will be scope to build at the highest densities paying regard to the London Plan density matrix, subject to individual site constraints.</td>
</tr>
<tr>
<td>IC20</td>
<td>89</td>
<td>4.132</td>
<td>Delete paragraph and replace with the following renumbering subsequent paragraphs as necessary: Tall buildings are those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline. The height at which buildings will be considered ‘tall’ on individual sites, together with detailed criteria for assessing the design and impact of tall buildings and consideration of the appropriateness of tall buildings on individual sites will be set out in the Development Management Policies Document (DMPD) and Site Specific Allocations Document (SSAD), having regard to the Council’s Stage 2 Urban Design Study (S2UDS). The DMPD, SSAD and S2UDS will take account of the criteria in Policy 4B.10 of currently adopted and emerging London Plan and the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework.</td>
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Tall buildings can, if well designed, create attractive landmarks underlining aspects of the borough’s character and act as a catalyst for regeneration. They can be an efficient way of using land in line with sustainability objectives, and add definition to the borough’s skyline. However, it is important that they are sited in appropriate locations, respect local context and the historic environment, are acceptable in terms of design and impact on their surroundings and do not harm existing important views and skylines.

Based on the Council’s Stage 1 Urban Design Statement – Tall Buildings, the Core Strategy identifies areas of search or potential where tall buildings may be appropriate. Within the borough’s town centres, Nine Elms near Vauxhall and at focal points of activity (Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock and Battersea Power Station) tall buildings may be appropriate (see policies PL 8, PL 9, PL 11, PL 12, PL 13, PL 14). However some sites within these broad areas will be sensitive to, or inappropriate for, tall buildings. These broad areas of search will be refined using locational guidance set out in the Stage 2 Urban Design Study, and specific sites considered suitable for tall buildings will be identified in the Site Specific Allocations Document. Outside these areas the borough is largely characterised by low-to medium-rise housing and tall buildings are likely to be considered inappropriate. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered ‘tall’ on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.

### Change

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<tr>
<td>IC21</td>
<td>89</td>
<td>IS 3 d</td>
<td>Replace IS 3 d with the following: Tall buildings, that is those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline, may be appropriate in the borough’s town centres, Nine Elms near Vauxhall or at Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, and Battersea Power Station focal points of activity (as illustrated on Map 15). Some locations within these areas will be sensitive to, or inappropriate for, tall buildings. Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment. Tall buildings are likely to be inappropriate in other areas. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and the height at which buildings will be considered ‘tall’ on individual sites will be contained in the Development Management Policies Document and Site Specific Allocations Document.</td>
</tr>
<tr>
<td>IC22</td>
<td>89</td>
<td>IS 3</td>
<td>Insert new policy IS 3 e as follows: Views of the Westminster World Heritage Site will be protected in accordance with the London Plan and the London View Management Framework.</td>
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<tr>
<td>IC23</td>
<td>89</td>
<td>After IS 3</td>
<td><strong>Insert Map 15 'Broad locations where tall buildings may be appropriate'</strong> (see Appendix A)</td>
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<tr>
<td>IC24</td>
<td>92</td>
<td>4.139</td>
<td><strong>At the end insert:</strong> To meet the requirements of PPS3 Housing, the Council is developing policies covering the proportion, size and type of affordable housing required, and to meet the needs of the borough's household profile for market housing. The policies in the Core Strategy will be supplemented by more detailed policies in the Development Management Policies Document, including policies on the protection of housing and housing land; the protection of family sized housing from conversion; housing mix in new developments; implementation of the Core Strategy affordable housing policy; and a policy covering specialised forms of housing, including student and supported housing. These policies will address the housing needs of the borough identified in the Council’s Housing Market Assessments.</td>
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<tr>
<td>IC25</td>
<td>93</td>
<td>4.143</td>
<td>The Council’s annual Housing Needs Assessments (known as an Annual Housing Market Assessment for 2008) review information on the supply of, and demand for, affordable housing. Wandsworth is the second highest provider of social housing in the South West London sector, but the increasing levels of affordable housing are not keeping pace with need. The Housing Needs Assessments have indicated substantial requirements both for social rented dwellings and for equity share (intermediate) homes.</td>
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<tr>
<td>IC26</td>
<td>94</td>
<td>4.144</td>
<td><strong>Insert new paragraph after 4.144 and subsequently renumber paragraphs throughout the document:</strong> The Mayor of London is reviewing targets for the delivery of new housing, including affordable housing as part of the preparation of the replacement London Plan. A review of the affordable housing targets in the Core Strategy will be undertaken following the publication of any replacement London Plan.</td>
</tr>
<tr>
<td>IC27</td>
<td>94</td>
<td>4.144</td>
<td><strong>Insert new paragraph after 4.144 and new paragraph referred to in change IC25</strong> The Council’s affordable housing economic viability assessment (AHEVA), commissioned in the summer of 2009, indicated that on individual sites a proportion of at least 33% of homes should be affordable, taking into account individual site costs, the availability of public subsidy, other scheme requirements, and economic viability. In seeking the maximum reasonable amount of affordable housing on individual sites, the policy will be applied sensitively. This means that a proportion of less than 33% of affordable housing may be acceptable where it can be justified by a site based economic viability assessment which takes into account site costs, the availability of public subsidy, other scheme requirements and economic viability. In other circumstances the Council will require a level of affordable housing provision higher than 33%, subject to the same considerations.</td>
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The Council's AHEVA indicates that only a small minority of sites are likely to be viable when providing 50% or more affordable housing. Given this fact and the costs involved in providing statements, the Council only requires site based affordable housing economic viability assessments for applications proposing less than 50% affordable housing and/or where the proportion of social rented and intermediate housing is not in accordance with Policy IS 5 C.

Evidence compiled in the Housing Market Assessment 2008 indicates that a split of 70% social rented and 30% intermediate accommodation within overall affordable housing provision would reflect the balance of demand between the different affordable housing types, a proportion which also reflects the 2008 London Plan targets. This split equates to a target of 2,607 social rented and 1,118 intermediate homes within the Council's current overall target of 3,725 affordable housing units to be provided in the ten years to 2016/17. However, the split achievable on individual sites will depend on the nature of the scheme and its location, the characteristics of other nearby housing and the need to maintain mixed and balanced communities, as well as scheme economics.

Insert new paragraph after 4.146 and renumber subsequent paragraphs

The 2009 Housing Market Assessment Update indicated a shift in the proportion of those requiring social rented and intermediate affordable housing which may justify adjusting the 70:30 tenure split in future. A review of the Core Strategy's overall affordable housing target and tenure split between social rented and intermediate affordable homes will be undertaken following the publication of the replacement London Plan, which is expected in 2011.

Penultimate sentence:

A 3% annual increase in demand, as identified in Government advice\(^1\) would give rise to a need for a further 3-4 pitches by 2021/22. The Council will continue to protect the existing Gypsy and Traveller site. A preferred site(s) to meet any future need in the plan period will be identified and protected in the Site Specific Allocations Document (SSAD), sought by the Council in conjunction with the Gypsy and Traveller community. The location of the site(s) and will be subject to public consultation as part of the preparation of the SSAD. The demand for and provision of additional pitches will be reviewed through the annual monitoring report process and through any relevant London Plan review. It is intended that the new site(s) will be implemented in order to meet future demand.

Add footnote to bottom of the page:

\(^{1}\) CLG, Preparing Regional Spatial Strategy reviews on
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<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
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<tr>
<td>IC30</td>
<td>96</td>
<td>IS 5 c</td>
<td>The Council will seek the maximum provision of affordable housing with a target of at least 3,725 affordable homes to be provided in the Borough between 2007/08 and 2016/17 from all sources. The Council will also seek to achieve a further 1,863 gross net additional affordable homes between 2017/18 and 2021/22. A mix of intermediate (equity share) (30%) and social rented (70%) accommodation will be sought. This tenure split will be reviewed when the London Plan is replaced, taking into account the findings of the borough’s future Housing Market Assessments and the Mayor’s London wide assessment. Significant levels of family accommodation will be sought in appropriate locations. These targets have been drawn up taking account of the potential provision of affordable housing from all sources including provision by the Council's hidden homes initiative and by Registered Social Landlords and affordable housing secured through planning agreements or conditions on private residential or mixed use development.</td>
</tr>
<tr>
<td>IC31</td>
<td>96</td>
<td>IS 5 c</td>
<td>Add to the end of Policy IS 5 c A review of the Core Strategy affordable housing numerical target and proportion of affordable rented and intermediate housing will be undertaken following the publication of any replacement London Plan which sets significantly higher housing targets during the plan period</td>
</tr>
<tr>
<td>IC32</td>
<td>96</td>
<td>IS 5 d</td>
<td>The Council will seek the maximum reasonable amount of affordable housing on individual private residential and mixed-use schemes of ten or more units (net-gross), having regard to the above targets, the need to encourage rather than restrain residential development and the individual circumstances of the site. The targets will be applied flexibly. On individual sites a proportion of at least 33% of homes should be affordable, however, higher provision will be sought where viable. The Council requires economic viability assessments which take into account individual site costs, the availability of public subsidy, and other scheme requirements and economic viability, to be submitted with all relevant planning applications where less than 50% affordable housing is proposed or where the proportion of social rented and intermediate housing is not in accordance with Policy IS5 c. Where re-development involving the loss of housing is proposed, the Council will seek to ensure replacement housing provision at existing or higher densities where appropriate.</td>
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<tr>
<td>IC33</td>
<td>96</td>
<td>IS 5 g</td>
<td>“The Council will continue to protect... The existing Gypsy and Traveller site at Trewint Street will be protected and The Council will seek to identify a new site for additional permanent facilities within the borough to meet the long term-needs of Gypsies and Travellers in the Site Specific Allocations Document having regard to: .....”</td>
</tr>
<tr>
<td>IC34</td>
<td>97</td>
<td>IS 5</td>
<td>At the end of the policy add: To support this policy, detailed policies on the protection of housing and housing land; the protection of family sized</td>
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<tr>
<td>IC35</td>
<td>102</td>
<td>4.161</td>
<td>The Planning Act 2008 sets out provisions for a Community Infrastructure Levy (CIL). CIL is a mechanism that councils can use to obtain a developer contribution towards the provision of infrastructure to support development in their areas. In order to support the provision of infrastructure projects necessary to deliver the Core Strategy, the Council will develop a joint Planning Obligations SPD/charging schedule, which is expected to be adopted during 2012. The SPD/infrastructure charging schedule will set out what will be funded by the CIL/tariff and what will be included in planning obligations in the future (e.g. local mitigation measures and affordable housing) and will set out the tariff(s) which are applicable in different parts of the borough where appropriate.</td>
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<tr>
<td>IC36</td>
<td>103</td>
<td>IS 7 b</td>
<td>The Council will develop a Supplementary Planning Document on Planning Obligations and an associated Charging Schedule(s) to support the provision of infrastructure projects necessary to deliver the Core Strategy, which it is expected to be adopted during 2012.</td>
</tr>
<tr>
<td>IC37</td>
<td>105</td>
<td>5.2</td>
<td>The Council’s approach to managing housing delivery, including stakeholder engagement, monitoring and review of housing delivery against a range of acceptable performance, and management actions/delivery options in the event that housing delivery does not occur at the expected rate will be included in a Housing Supplementary Planning Document.</td>
</tr>
</tbody>
</table>
| IC38      | 106  | 5.11             | After paragraph 5.11 add new section: **Risks**  

The major risks in relation to the successful implementation of the Council’s strategy relate to the provision of the major infrastructure requirements necessary for the development of the Opportunity Area in Nine Elms and the adjoining area in north-east Battersea and the extent of the current economic downturn.  

In relation to the development of Nine Elms/north-east Battersea, the Council is working proactively to help minimise the risks. The Council will set up a governance body for the area, led by the Council and including all of the major stakeholders vital to the development of the area. The joint GLA/Council led VNEB Opportunity Area Development Infrastructure Funding Study (DIFS) will be...
key to determining the level of funding required and the mechanisms to be employed to ensure its delivery. The Council will also be part of the Northern Line Extension Group to be led by London Underground Limited, part of Transport for London. In relation to the Northern Line Extension, the Council will also work with Transport for London to investigate alternative funding mechanisms such as the use of tax incremental financing (TIF) as means of financing major infrastructure requirements. If the current economic downturn extends significantly into the plan period, it is expected that this will lead to a need to revise the housing targets set in the London Plan. In addition to the annual review of targets undertaken as part of the AMR process it is intended to undertake a wider review of targets, including those for key areas of change in the borough, following the publication of any replacement London Plan.

Where it would appear through monitoring that targets are not being met it may be necessary to for the Council to review the policies within the Core Strategy to see if they need to be amended in order to secure delivery of the spatial vision, consider alternative strategies or take appropriate management action to remedy the cause of underperformance. For borough level targets, e.g. housing targets, any performance below 80% of minimum targets two years in a row will trigger a review of policy. The need to review policies relating to specific areas of the borough or take appropriate management action, will also account of information on likely future delivery, e.g. information on the granting of planning permissions and feedback from developers on the prospects for the implementation of schemes. The need to review policies, consider alternative strategies or take other appropriate management action will be identified in the Annual Monitoring Reports.

Replace with new Infrastructure Delivery table contained in Appendix A of this schedule.
### Appendix 1 – Infrastructure Delivery Table (Page 107 – 125)

**Policy PL1 - Attractive and distinctive neighbourhoods and regeneration initiatives. Protect distinctive
neighbourhoods, promote regeneration in specified areas.**

**Infrastructure: n/a**

**AMR Indicators:**

<table>
<thead>
<tr>
<th>Key</th>
<th>Significant Effects Indicator 15 'Indices of deprivation in Wandsworth and Regeneration Areas'</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Significant Effects Indicator 16 'Unemployed residents in Super Output Areas with high ranking indices of deprivation'</td>
</tr>
<tr>
<td><strong>KEY</strong></td>
<td>Local Output Indicator 1 'Amount of employment floorspace completed by type in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 17 'Life Expectancy at Birth in Wandsworth and Regeneration areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 18 'Standardised Mortality Ratio in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 19 'Standardised Mortality Ratio: Cancer, in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 20 'Standardised Mortality Ratio: CHD, in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 21 'Standardised Mortality Ratio: Circulatory Disease, in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 22 'Infant Mortality Rate per 1000 Live Births (3 year average) in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 23 'Self assessment of health (% of residents) in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 24 'Self assessment of LLTI (% of people living in households) in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 25 'Number of domestic burglaries per 1,000 households in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 26 'Violent crimes (against the person, sexual offences and robbery) in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 27 'Number of vehicle crimes per 1,000 population in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 28 'Robberies (personal and commercial) in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 29 'The percentage of pupils in local authority schools achieving 5 or more A* – C grade GCSEs or equivalent in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 30 'The percentage of Key Stage 2 (KS2) pupils achieving level 4 or better in tests: in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 31 'The percentage of residents (aged 16-74) who attained level 4/5 qualifications in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 32 'Proportion of young people (16-18 year olds) not in full time education employment or training (NEET) in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Local Output Indicator 2 'Employment by employment category in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Local Output Indicator 3 'Size of Businesses in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 33 'Claimant Count (Unemployment) Rate in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 34 'Percentage change in the number of VAT registered businesses in Wandsworth and Regeneration Areas'</td>
</tr>
<tr>
<td></td>
<td>Significant Effects Indicator 35 'Number and percentage of vacant business premises in Employment Areas'</td>
</tr>
<tr>
<td></td>
<td>Local Output Indicator 4 'Dwelling completions in Wandsworth and Regeneration Areas'</td>
</tr>
</tbody>
</table>

**Policy PL2 – Flood Risk. Allowing in-principle development of appropriate sites within Flood zones 2 and 3 in terms of
the Sequential Test of PPS25, with proposals for individual sites being subject to the exceptions test of PPS25.**

**Infrastructure: n/a**

**AMR Indicators:**

<table>
<thead>
<tr>
<th>Key</th>
<th>Significant Effects Indicator 36 'Percentage of new dwellings permitted within 1 in 100 year flood risk zone'</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>KEY</strong></td>
<td>Local Output Indicator 5 'Number of planning permissions incorporating flood risk measures'</td>
</tr>
</tbody>
</table>
Core Output Indicator E1 ‘Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds’

Policy PL3 - Transport. Improve public transport and promote sustainable modes of travel

### Infrastructure:

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
<th>Delivery Agency</th>
<th>Delivery Timescale</th>
<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Enhanced National Rail services</strong></td>
<td>Provision of 10 carriage train services with associated lengthening of platforms, to be followed by 12 carriage trains.</td>
<td>Unknown</td>
<td>Network Rail and train operating companies</td>
<td>10 carriage by 2014 12 carriage by 2020</td>
<td>Government, train operators and limited planning agreement contributions.</td>
<td></td>
</tr>
<tr>
<td><strong>Improvements to stations</strong></td>
<td>Enhancements to provide greater station capacity, improved access and higher quality station environment. Improvement required to address future and predicted capacity issues at Clapham Junction, Putney, Wandsworth Town, Balham, Battersea Park and Earlsfield.</td>
<td>Unknown</td>
<td>Network Rail, Transport for London (TfL) and train operating companies</td>
<td>Ongoing to 2020</td>
<td>Government, TfL, train operators and planning agreement contributions</td>
<td>Currently issues with Network Rail and rail operators through National Station Improvement Regime to progress schemes where developer contributions have been obtained</td>
</tr>
<tr>
<td><strong>Crossrail 2 (Chelsea Hackney Line)</strong></td>
<td>Provision of a new underground line linking south-west London and north and east London. Provides direct links to central London and should have a station at Clapham Junction to enable interchange away from the central rail termini.</td>
<td>Unknown</td>
<td>Department for Transport (DfT) / TfL</td>
<td>2024</td>
<td>DfT, TfL, businesses, planning agreements and /or Community Infrastructure Levy.</td>
<td>Forms part of proposed amendments to GLA London Plan for funding after Crossrail 1.</td>
</tr>
<tr>
<td><strong>East London Line Extension</strong></td>
<td>Provision of an extension of the East London Line from Surrey Quays to Clapham Junction. Powers already exist and the extension to West Croydon is currently under construction.</td>
<td>+£30m</td>
<td>TfL</td>
<td>May 2012</td>
<td>Funding arrangement now agreed between TfL and DfT.</td>
<td></td>
</tr>
<tr>
<td><strong>Tramlink Extensions</strong></td>
<td>Possible extension of Croydon Tramlink network to Tooting Area or Cross River Tram or London Tram into Battersea / Nine Elms area.</td>
<td>Unknown</td>
<td>TfL</td>
<td>2026</td>
<td>DfT, TfL, businesses, planning agreements and /or Community Infrastructure Levy.</td>
<td>Tram schemes currently stalled in TfL business plan.</td>
</tr>
<tr>
<td><strong>Improved walking and cycling routes</strong></td>
<td>Improvements to local sustainable transport routes to promote greater levels of walking and cycling. Includes</td>
<td>Ongoing.</td>
<td>Wandsworth Borough Council (WBC), Wandle</td>
<td>Ongoing to 2020</td>
<td>TfL funding both direct and through Local Implementation Plan (LIP) grant</td>
<td></td>
</tr>
<tr>
<td>Project</td>
<td>Description</td>
<td>Budget or Cost</td>
<td>Timing</td>
<td>Funding Sources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------------------</td>
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<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Riverside Path</td>
<td>Provision of path along both the River Thames and River Wandle</td>
<td>Unknown</td>
<td>Ongoing</td>
<td>Funded as integral part of planning applications.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nine Elms Lane – public transport enhancements</td>
<td>Provision of enhanced public transport. Provision to be identified through the Opportunity Area Planning Framework (OAPF) which is expected to be adopted by the end of 2009. Should include improvements to Battersea Park, Queenstown Road and Vauxhall stations. Provision of extension of Northern Line to Battersea Power Station, trams or enhanced bus services.</td>
<td>Range of schemes with costs up to £1billion</td>
<td>Variable</td>
<td>Contributions through planning agreements. Potential through standard development charge from emerging Opportunity Area Planning Framework or Community Infrastructure Levy. Significant work ongoing as part of the OAPF. Separate funding feasibility work also underway by TfL and major developers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wandsworth Town Station</td>
<td>A range of improvements including new entrance and ticket office, new canopy to Platform 4 etc.</td>
<td>£4.8m</td>
<td>2012</td>
<td>Contributions through planning agreements. DfT Rail, Network Rail and Train operator.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interchange improvements</td>
<td>Improved bus / rail interchange, including improved stopping facilities on street and standing arrangements. Longer term option for a bus station.</td>
<td>Unknown</td>
<td>Ongoing</td>
<td>Contributions through planning agreements. DfT and TfL grant.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improved access at Putney mainline and East Putney Underground stations</td>
<td>Improved entrance to Putney station from Putney High Street with lift access and larger ticket hall. Potential eastern entrance from Oxford Road to Putney station, improving interchange with East Putney station.</td>
<td>£3m</td>
<td>Putney High Street 2012 Oxford Road 2018</td>
<td>Contributions through planning agreements. DfT and TfL grant.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improved access to Barnes main line station</td>
<td>Improved access between the “Heart of Roehampton” and Barnes station, the nearest point of access to the rail network. Provision of enhanced bus services and facilities to improve walking and cycling.</td>
<td>£1m</td>
<td>3-5 years</td>
<td>TfL grant and limited opportunity from planning agreements.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improved Improved walking and</td>
<td>£1m WBC</td>
<td>1-5 years</td>
<td>TfL Grant and Work on site</td>
<td>contribitions through planning agreements. DfT and TfL grant.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
access within Roehampton, cycling access between the “Heart of Roehampton”, the rest of the estates, Queen Mary’s Hospital, Roehampton University and Richmond Park. Includes public realm works to improve environment and create a safer environment. limited opportunity from planning agreements. commenced 2008-09. Ongoing work depends on public consultation and grant availability

AMR Indicators:

KEY Significant Effects Indicator 37 'Percentage of borough (by geographical area) in each PTAL band'

KEY Significant Effects Indicator 38 'Length of cycle routes in the borough'

KEY Significant Effects Indicator 39 'Length (m) of pedestrian links and/or (m2) of pedestrian space on completed developments'

Significant Effects Indicator 40 'Access to public transport for disabled people'

Local Output Indicator 6 'Percentage of completed development complying with the car-parking standards set out in the local development framework'

Significant Effects Indicator 41 'Percentage of journeys by public transport.'

Significant Effects Indicator 42 'Number of schools and companies with approved travel plans'

Significant Effects Indicator 43 'Enhanced capacity on rail and underground lines'

Significant Effects Indicator 44 'Provision of new transport links'

PL4 - Open space and the natural environment. Protect and enhance; the open space network; sports opportunities and biodiversity.

Infrastructure:

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
<th>Delivery Agency</th>
<th>Delivery Timescale</th>
<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Open Space</td>
<td>To create additional public open space as part of new developments, with particular emphasis on areas identified as deficient in open space. An example of where a new public open space is being created as part of a planning permission is Battersea Reach, York Road, SW18 (under construction).</td>
<td>Unknown</td>
<td>Provision through inclusion in planning application</td>
<td>Ongoing.</td>
<td>Funded as integral part of planning applications.</td>
<td></td>
</tr>
<tr>
<td>Wandle Valley Regional Park</td>
<td>To provide a linear park and secure regeneration, including environmental improvements and better transport links to, and along the Wandle Valley</td>
<td>Unknown</td>
<td>Wandle Valley Regional Park Steering Group</td>
<td>TBC</td>
<td>TBC</td>
<td></td>
</tr>
<tr>
<td>Vauxhall/Nine Elms Opportunity Area</td>
<td>To provide a green corridor/linear park through the Opportunity Area</td>
<td>Unknown</td>
<td>Provision through planning application and legal agreements.</td>
<td>2026</td>
<td>Provided through planning applications</td>
<td>Key element of emerging public realm strategy for the OAPF.</td>
</tr>
</tbody>
</table>
**PL5 - Provision of new homes - 750 p.a. target. Limited release of surplus industrial land, development in line with London Plan densities.**

**Infrastructure:** n/a

**Phasing:** (Housing Capacity Assessment)

<table>
<thead>
<tr>
<th>Year</th>
<th>Identified Housing Capacity</th>
<th>Compared with target of</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007/08 – 2011/12</td>
<td>4866 – 7129</td>
<td></td>
</tr>
<tr>
<td>2007/08 – 2016/17</td>
<td>11506 – 14613</td>
<td>Compared with target of</td>
</tr>
<tr>
<td>2007/08 – 2021/22</td>
<td>17156 – 20918</td>
<td>compared with target of</td>
</tr>
</tbody>
</table>

**AMR Indicators:**

- Core Output Indicator H1 'Plan period and housing targets'
- KEY Core Output Indicator H2 'Net additional dwellings'
- KEY Local Output Indicator 11 'Net additional homes'
- Core Output Indicator H3 'New and converted dwellings on previously developed land'
- Core Output Indicator H4 'Net additional pitches (Gypsy and Traveller)'
- Local Output Indicator 12 'Conversion and change of use schemes granted planning permission and in the planning pipeline'
- Local Output Indicator 13 'Number of applications granted and refused planning permission where a loss (and no gain) of residential units is proposed'
- Significant Effects Indicator 48 'Dwellings failing to meet decent home standards'

**PL6 - Meeting the needs of the local economy. Meeting the needs of the local economy by securing a strategic reservoir for industry and waste; enabling mixed use development on appropriate employment sites, encouraging office development in Putney and supporting regeneration initiatives in areas lacking employment opportunities.**

**Infrastructure:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
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<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flexible business units</td>
<td>Provision of flexible business units of up to 2000 sq ms. Examples of where this has already been achieved is Battersea Studios, 80 Silverthorne Rd, SW8 (2007/1306) and 102-104 Stewarts Rd, SW8 (2006/4701).</td>
<td>Unknown</td>
<td>Provision through inclusion in planning application</td>
<td>Ongoing</td>
<td>Funded as integral part of planning applications.</td>
<td></td>
</tr>
</tbody>
</table>

**AMR Indicators:**

- KEY Local Output Indicator 14 'Amount of employment floorspace completed by type in SILs, LSIAs, TCs and the TPA'
- KEY Local Output Indicator 15 'Loss of employment floorspace to residential use in SILs, LSIAs, TCs and the TPA'
- Local Output Indicator 16 'Floorspace of proposed flexible business space.'
PL7 - Land for industry and waste. Existing IEAs to continue to be strategic reservoir of land for industry and potential for waste management. Mixed use developments acceptable subject to criteria. Appropriate sites for waste management to be allocated.

**Infrastructure:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
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<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste management facilities</td>
<td>Completion of the Western Riverside Transfer Station MRF. Provision of additional waste management sites of at least 0.3 ha in size, to meet future predicted needs and to enable the borough to become 85% self sufficient by 2020.</td>
<td>Unknown.</td>
<td>Waste Authority</td>
<td>Ongoing to 2020</td>
<td>Unknown</td>
<td>Alternative methods of waste management are also being trialled. Includes pilot pyrolysis facilities.</td>
</tr>
</tbody>
</table>

**AMR indicators:**

**KEY** Local Output Indicator 17 'Amount of land in waste management use (ha)'

Local Output Indicator 18 'Location of sites for waste management'

Local Output Indicator 19 'Loss of existing waste management facilities'

**KEY** Local Output Indicator 20 'Amount and percentage of employment floorspace (gains and losses) completed in SILs and LSIAs'

Core Output Indicator BD1 'Total amount of additional employment floorspace by type'

Core Output Indicator BD2 'Total amount of floorspace on previously developed land by type'

Core Output Indicator BD3 'Employment land available - by type'

Core Output Indicator W2 Amount of municipal waste arising and managed by management type

Local Output Indicator 21 'Employment floorspace completions and pipeline'

PL8 - Town and local centres - the 5 town centres, together with local centres, to be the focus for shopping and complementary activity.

**Infrastructure:**

**AMR Indicators:**

**KEY** Local Output Indicator 22 'Amount and percentage of completed retail development in town centres and local centres by type'

Local Output Indicator 23 'Retail schemes granted planning permission and in the planning pipeline. Proportion of schemes and floorspace located in Town Centres'

Local Output Indicator 24 'Proportion of A1 retail units in Town and Local Centre Core Frontages'

Local Output Indicator 25 'Proportion of A1 retail units in Town and Local Centre Secondary Frontages'

Local Output Indicator 26 'Proportion of A1 retail units in Important Local Parades'

**KEY** Local Output Indicator 27 'Percentage of vacant units within Town Centres'

**KEY** Local Output Indicator 28 'Number and proportion of dwelling completions in Town Centres'

Core Output Indicator BD4 'Total amount of floorspace for 'town centre' uses'

Local Output Indicator 29 'Size / vacancies in street markets'

Local Output Indicator 30 'Amount of completed office development (gains and losses) in Town Centres'

Local Output Indicator 31 'Relation of density to the London Plan matrix in Town Centres'

PL9 - River Thames and the riverside. Focus for large mixed developments with improved use of the river and ecology.

**Infrastructure:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
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<th>Any other comments</th>
</tr>
</thead>
</table>

**Riverside Path**
Provision of path along both the River Thames and River Wandle
Unknown
Developer / WBC
Ongoing
Funded as integral part of planning applications.

**River infrastructure**
New and enhanced facilities, including piers, jetties, slipways etc. To include piers for riverbus services.
Unknown
TfL River Services, Port of London Authority, WBC.
Ongoing to 2020
Contributions through planning agreements.

**Improved walking and cycling routes**
Improvements to local sustainable transport routes to promote greater levels of walking and cycling. Includes both strategic routes such as Thames Path, Capital Ring and Wandle Trail and more local networks and improved permeability throughout the borough.
Ongoing
Wandsworth Borough Council (WBC), SUSTRANS, Port of London Authority, Environment Agency.
Ongoing to 2020
TfL funding both direct and through LIP grant allocations, Contributions through planning agreements.

**AMR indicators:**

**KEY Local Output Indicator 32 'Dwelling completions in the Thames Policy Area (TPA)'**

**KEY Local Output Indicator 33 'Length of riverside walk along the River Thames (m)'**

Local Output Indicator 34 'Amount of employment floorspace completed in the Thames Policy Area'

Local Output Indicator 35 'Amount of public open space provided on completed new developments at focal points along the riverside'

Local Output Indicator 36 'Gain /loss of moorings and jetties and associated facilities on the River Thames'

Significant Effects Indicator 49 'Number of Protected Wharves'

Significant Effects Indicator 50 'Loss and gain of facilities related to the use of the river at Putney Embankment'

**PL 10 - The Wandle Valley - strategic reservoir for employment land and waste management facilities and Regional Park.**

**Infrastructure:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Improved walking and cycling routes</td>
<td>Improvements to local sustainable transport routes to promote greater levels of walking and cycling. Includes both strategic routes such as Thames Path, Capital Ring and Wandle Trail and more local networks and improved permeability throughout the borough.</td>
<td>Ongoing</td>
<td>Wandsworth Borough Council (WBC), Wandle Valley Regional Park Steering Group</td>
<td>Ongoing to 2020</td>
<td>TfL funding both direct and through LIP grant allocations, Contributions through planning agreements.</td>
<td></td>
</tr>
<tr>
<td>Riverside Path</td>
<td>Provision of path along both the River Thames and River Wandle</td>
<td>Unknown</td>
<td>Developer / WBC</td>
<td>Ongoing</td>
<td>Funded as integral part of planning applications.</td>
<td></td>
</tr>
</tbody>
</table>
New public open space and environmental enhancement within the town centre and Wandle Delta.

Unknown
TfL, WBC and developers.
2015
Contributions through planning agreements. TfL grant.


**AMR Indicators:**

**KEY**
Local Output Indicator 37 'Length of riverside walk along the Wandle (m)'
Local Output Indicator 38 'Amount of employment floorspace completed by type in the Wandle Valley'
Local Output Indicator 39 'Dwelling completions in the Wandle Valley'

<table>
<thead>
<tr>
<th>AMR Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Output Indicator 37 'Length of riverside walk along the Wandle (m)'</td>
</tr>
<tr>
<td>Local Output Indicator 38 'Amount of employment floorspace completed by type in the Wandle Valley'</td>
</tr>
<tr>
<td>Local Output Indicator 39 'Dwelling completions in the Wandle Valley'</td>
</tr>
</tbody>
</table>

**PL11 - Nine Elms and the adjoining area in north east Battersea. High density development on the riverside, retention, consolidation and intensification of New Covent Garden Market.**

**Infrastructure:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
<th>Delivery Agency</th>
<th>Delivery Timescale</th>
<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nine Elms Lane – public transport enhancements</td>
<td>Provision of enhanced public transport. Provision to be identified through the Opportunity Area Planning Framework which is expected to be adopted by the end of 2009. Should include improvements to Battersea Park, Queenstown Road and Vauxhall stations. Provision of extension of Northern Line to Battersea Power Station, trams or enhanced bus services.</td>
<td>Range up to £1billion.</td>
<td>TfL, Network Rail.</td>
<td>Variable</td>
<td>Contributions through planning agreements. Potential through standard development charge from Planning Framework or Community Infrastructure Levy.</td>
<td>Significant work ongoing as part of the OAPF. Separate funding feasibility work also underway by TfL and major developers.</td>
</tr>
<tr>
<td>Stewarts Road / Silverthorne Road – access improvements</td>
<td>Access improvements to the industrial area.</td>
<td>Unknown</td>
<td>WBC</td>
<td>2014</td>
<td>Contributions through planning agreements. TfL grant.</td>
<td>Already have some funding agreed for urban design but London Development Agency to look at public realm and access.</td>
</tr>
<tr>
<td>Improved social and community infrastructure</td>
<td>There is a need to safeguard existing community facilities, but to also ensure that enhancements to existing facilities and new facilities are provided to meet the needs of the growing population.</td>
<td>Unknown</td>
<td>WBC and other agencies and charities providing these services.</td>
<td>Ongoing</td>
<td>WBC and other agency funding and through planning agreements where appropriate.</td>
<td>The Council is undertaking a review of the social infrastructure requirements of Nine Elms/north east Battersea and part of the work has included engaging Wandsworth Teaching Primary Care Trust and Children’s Services</td>
</tr>
<tr>
<td>Category</td>
<td>Description</td>
<td>Department</td>
<td>Budget</td>
<td>Year</td>
<td>Notes</td>
<td></td>
</tr>
<tr>
<td>--------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------</td>
<td>---------</td>
<td>---------</td>
<td>----------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Further &amp; Higher Education</td>
<td>New and extended further and higher educational facilities. Permission granted for a new educational centre for the Royal College of Art in Howie Street/Battersea Bridge Road, SW11.</td>
<td>Unknown</td>
<td>Royal College of Art</td>
<td>Ongoing</td>
<td>TBC</td>
<td></td>
</tr>
<tr>
<td>Secondary Schools</td>
<td>Rebuild or renewal of 16 school premises through Building Schools for the Future. Includes new 7 form entry Roman Catholic (RC) school on the former Salesian College site, replacing the outdated facilities at Elliott School, new teaching blocks and new or enlarged 6 form facilities at a range of schools. Construction phase to begin in autumn 2010 (Burntwood and Southfields Schools). Work on new RC school and Elliott school due to begin summer 2011.</td>
<td>£250m</td>
<td>WBC</td>
<td>2016</td>
<td>National Building Schools for the Future, from Department for Children, Schools and Families (DCSF).</td>
<td></td>
</tr>
<tr>
<td>Primary Schools</td>
<td>Provision of new and enhanced facilities at primary schools to meet identified and forecast increase in demand for school places. Short term programme contained in the primary strategy for Change, which identifies work at 6 schools in Tooting, Balham, Southfields and West Putney. Further enhancements are expected within the life of this plan.</td>
<td>£21.6m short term</td>
<td>WBC</td>
<td>2011 onwards</td>
<td>Primary Capital Programme (DCSF), WBC Capital Programme, Locally Controlled Voluntary Aided Programme and other minor sources. Longer Term it is expected that contributions will be provided through development. Current proposals at Springfield Hospital and Battersea Power Station both propose new primary school provision.</td>
<td></td>
</tr>
<tr>
<td>Integrated children’s centres</td>
<td>Completion of the borough’s network of integrated children’s centres. Under construction: a new Children’s Centre at Hillbrook Primary School, SW17; refurbishment and extensions to Roehampton Children’s Centre.</td>
<td>Unknown</td>
<td>WBC</td>
<td>2010</td>
<td>Sure Start Programme</td>
<td></td>
</tr>
</tbody>
</table>

**AMR Indicators:**
PL.12 - Central Wandsworth and the Wandle Delta. Seek mixed use development on land set aside for employment, strengthen links between the town centre and the riverside and station.

### Infrastructure:

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
<th>Delivery Agency</th>
<th>Delivery Timescale</th>
<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wandsworth one way system</td>
<td>Rearrangement of one way system, allowing two way traffic on Armoury Way and local access and buses only in Wandsworth High Street.</td>
<td>£35m to £45m</td>
<td>TfL, and WBC.</td>
<td>2015</td>
<td>Planning agreement contribution. TfL</td>
<td>£38m contribution agreed with Ram Brewery. SoS call in – public inquiry expected in November 2009.</td>
</tr>
<tr>
<td>Wandsworth Town Station</td>
<td>A range of improvements including new entrance and ticket office, new canopy to Platform 4 etc.</td>
<td>£4.8m</td>
<td>Network Rail, SW Trains, WBC</td>
<td>2012</td>
<td>Contributions through planning agreements. DfT Rail, Network Rail and Train operator.</td>
<td>(see above)</td>
</tr>
<tr>
<td>Public open space</td>
<td>New public open space and environmental enhancement within the town centre and Wandle Delta.</td>
<td>Unknown</td>
<td>TIL, WBC and developers.</td>
<td>2015</td>
<td>Contributions through planning agreements. TIL grant.</td>
<td></td>
</tr>
<tr>
<td>New Pedestrian and cycle access</td>
<td>Improved pedestrian and cycle access both within and between the town centre, Wandsworth Town Station and the Wandle Delta.</td>
<td>£500K</td>
<td>TIL, WBC and developers.</td>
<td>2015</td>
<td>Contributions through planning agreements. TIL grant.</td>
<td></td>
</tr>
<tr>
<td>Neville Gill Close</td>
<td>Provision of a new park side promenade, providing a pedestrian priority access between King George’s park and the Southside shopping centre.</td>
<td>£400K</td>
<td>TIL, WBC and developers.</td>
<td>2015</td>
<td>Contributions through planning agreements. TIL grant.</td>
<td></td>
</tr>
<tr>
<td>Further &amp; Higher Education</td>
<td>New and extended further and higher educational facilities.</td>
<td>Unknown</td>
<td>South Thames College</td>
<td>Ongoing</td>
<td>TBC</td>
<td></td>
</tr>
<tr>
<td>Policing</td>
<td>Provision of a custody centre, patrol base appropriate to an employment location and a range of ‘front counters’ in accessible locations, e.g. town and local centres, to</td>
<td>Unknown</td>
<td>Metropolitan Police and WBC</td>
<td>Ongoing</td>
<td>Metropolitan Police with developer contributions in respect to accommodation within development.</td>
<td></td>
</tr>
</tbody>
</table>
**AMR Indicators:**

**KEY Local Output Indicator 44** 'Dwelling completions in Central Wandsworth and the Wandle Delta'

**KEY Local Output Indicator 45** 'Amount of employment floorspace completed by type in Central Wandsworth and the Wandle Delta'

**KEY Local Output Indicator 46** 'Length of new pedestrian links between Town Centre and Thames, including links along Wandle and to Wandsworth town station'

**Local Output Indicator 47** 'Percentage of vacant units within Southside Shopping Centre'

**Local Output Indicator 48** 'A1 / A2 completions in Wandsworth Town Centre & in Southside specifically'

**Local Output Indicator 49** 'Density of traffic / Level of traffic in Wandsworth High Street'

**PL13 - Clapham Junction and the adjoining area. Improve the station, support comprehensive redevelopment of station and adjacent sites, extend centre around Falcon Lane.**

**Infrastructure:**

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
<th>Delivery Agency</th>
<th>Delivery Timescale</th>
<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>New station infrastructure</td>
<td>Improved station entrances and capacity within the station. Longer platforms with improved passenger facilities.</td>
<td>Unknown</td>
<td>Network Rail, train operators, TfL, WBC.</td>
<td>2018</td>
<td>Contributions through planning agreements. DfT and TfL grant.</td>
<td>Major planning application withdrawn. Revised proposals to be agreed with rail industry and TfL.</td>
</tr>
<tr>
<td>Interchange improvements</td>
<td>Improved bus / rail interchange, including improved stopping facilities on street and standing arrangements. Longer term option for a bus station.</td>
<td>Unknown</td>
<td>WBC and TfL.</td>
<td>Ongoing</td>
<td>Contributions through planning agreements. DfT and TfL grant.</td>
<td></td>
</tr>
<tr>
<td>Improved access to the north of the station</td>
<td>Links to Falcon Road and Winstanley Road, with improved public realm in the Grant Road area.</td>
<td>Unknown</td>
<td>WBC, TfL.</td>
<td>2015</td>
<td>Contributions through planning agreements. TfL grant.</td>
<td></td>
</tr>
<tr>
<td>Clapham Junction Exemplar</td>
<td>Improvements to St John’s Road, Falcon Road, Lavender Hill and St John’s Road</td>
<td>£6.7m</td>
<td>WBC</td>
<td>2012</td>
<td>Contributions through planning agreements. TfL grant.</td>
<td>Work due to commence 2009/10. Scheme approved at detailed design stage.</td>
</tr>
</tbody>
</table>

**AMR Indicators:**

**KEY Local Output Indicator 50** 'Dwelling completions in Clapham Junction'

**KEY Local Output Indicator 51** 'Amount of employment floorspace completed by type in Clapham Junction'

**KEY Local Output Indicator 52** 'Length of street pedestrian enhancements'

**Local Output Indicator 53** 'Clapham Junction station improvements'

**Local Output Indicator 54** 'Amount of new mixed use development in the Grant Road Area, Falcon Road and Peabody Estate'

**Local Output Indicator 55** 'Relation of density to the London Plan matrix'

**PL14 - East Putney and Upper Richmond Road. Redevelopment and refurbishment of offices to deliver modern office space, new housing, new shops/restaurants and improved public realm.**

**Infrastructure:**
### Improved access at Putney mainline and East Putney Underground stations
- Description: Improved entrance to Putney High Street with lift access and larger ticket hall. Potential eastern entrance from Oxford Road to Putney Station, improving interchange with east Putney Station.
- Cost: £3m
- Delivery Agency: Network rail, train Operators, TFL and WBC
- Delivery Timescale: Putney High Street 2012, Oxford Road 2018
- Funding Arrangements: Contributions through planning agreements. DfT and TFL grant.

### Other transport improvements including improved streetscape and public realm
- Description: Improvements to Putney High Street to provide an enhanced public realm and reduce street clutter. Provision of SCOOT traffic signal operation.
- Cost: £1m
- Delivery Agency: WBC and TFL.
- Delivery Timescale: 2010
- Funding Arrangements: TFL grant.

#### AMR Indicators:
- KEY Local Output Indicator 56 'Dwelling completions in East Putney and Upper Richmond Road'
- KEY Local Output Indicator 57 'Amount of office floorspace (gains and losses) completed in East Putney and Upper Richmond Road'
- Local Output Indicator 58 'Amount of completed employment floorspace by type in East Putney and Upper Richmond Road'
- Local Output Indicator 59 'Relation of density to the London Plan matrix'

### Improved access within Roehampton
- Description: Improved walking and cycling access between the “Heart of Roehampton”, the rest of the estates, Queen Mary’s Hospital, Roehampton University and Richmond Park. Includes public realm works to improve environment and create a safer environment.
- Cost: £1m
- Delivery Agency: WBC
- Delivery Timescale: 1-5 years
- Funding Arrangements: TFL Grant and limited opportunity from planning agreements.

#### Work on site commenced 2008-09. Ongoing work depends on public consultation and grant availability.

### Comprehensive regeneration of Roehampton
- Description: Improved housing, new business floorspace, new and improved shops, new library, new community facilities and environmental improvements. Currently at the outline application stage.
- Cost: Unknown
- Delivery Agency: WBC and public and private sector partners
- Delivery Timescale: 2015
- Funding Arrangements: WBC, public and private sector partners.

### Improved access to Barnes mainline Station
- Description: Improved access between the “Heart of Roehampton” and Barnes station, the nearest point of access to the rail network. Provision of enhanced bus services and facilities to improve walking and cycling.
- Cost: £1m
- Delivery Timescale: 3-5 years
- Funding Arrangements: TFL grant and limited opportunity from planning agreements.

### Policing
- Description: Police front counter
- Cost: Unknown
- Delivery Agency: Metropolitan
- Delivery Timescale: Ongoing
- Funding Arrangements: Metropolitan

### PL15 – Roehampton. Support regeneration to create a new heart for Roehampton.

#### Infrastructure:

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Comprehensive regeneration of Roehampton</td>
<td>Improved housing, new business floorspace, new and improved shops, new library, new community facilities and environmental improvements. Currently at the outline application stage.</td>
<td>Unknown</td>
<td>WBC and public and private sector partners</td>
<td>2015</td>
<td>WBC, public and private sector partners.</td>
<td></td>
</tr>
<tr>
<td>Improved access to Barnes mainline Station</td>
<td>Improved access between the “Heart of Roehampton” and Barnes station, the nearest point of access to the rail network. Provision of enhanced bus services and facilities to improve walking and cycling.</td>
<td>£1m</td>
<td>TFL, Wandsworth Borough Council and Richmond-Upon-Thames Borough Council.</td>
<td>3-5 years</td>
<td>TFL grant and limited opportunity from planning agreements.</td>
<td>Work on site commenced 2008-09. Ongoing work depends on public consultation and grant availability.</td>
</tr>
<tr>
<td>Improved access within Roehampton</td>
<td>Improved walking and cycling access between the “Heart of Roehampton”, the rest of the estates, Queen Mary’s Hospital, Roehampton University and Richmond Park. Includes public realm works to improve environment and create a safer environment.</td>
<td>£1m</td>
<td>WBC</td>
<td>1-5 years</td>
<td>TFL Grant and limited opportunity from planning agreements.</td>
<td></td>
</tr>
<tr>
<td>Policing</td>
<td>Police front counter</td>
<td>Unknown</td>
<td>Metropolitan</td>
<td>Ongoing</td>
<td>Metropolitan</td>
<td></td>
</tr>
</tbody>
</table>
included in outline application for the “Heart of Roehampton” (2008/4552).

Police and WBC

Police with developer contributions in respect to accommodation within development.

AMR Indicator:

KEY Local Output Indicator 60 'Dwelling completions in Roehampton'

KEY Local Output Indicator 61 'Amount of employment floorspace completed by type in Roehampton'

KEY Local Output Indicator 62 'Public transport improvements from heart of Roehampton to Barnes station, Queen Mary's Hospital and Roehampton University'

IS1 – Sustainable Development. Reduce use of resources, optimise use of land, support provision of business space promote travel plans and adopt maximum parking standards.
Infrastructure: n/a

AMR Indicator:

KEY Local Output Indicator 63 'Percentage of new build developments completed on Brownfield land'

KEY Local Output Indicator 64 'New build residential dwelling completions by PTAL score'

KEY Local Output Indicator 65 'Number of cycle parking spaces on completed large residential developments'

Local Output Indicator 66 'Number of new build residential car free developments completed in areas of good PTAL'

IS2 - Sustainable design, low carbon development and renewable energy. Encourage measures to improve energy conservation and reduce carbon emissions.
Infrastructure: n/a

AMR Indicator:

Core Output Indicator E3 'Renewable energy generation'

KEY Local Output Indicator 67 'Developments completed with renewable energy installations'

Local Output Indicator 68 'Code for Sustainable Homes rating for all new dwellings'

Local Output Indicator 69 'BREEAM rating for all new non-residential development'

Local Output Indicator 70 '% reduction in carbon emissions achieved through on-site renewable energy generation'

IS3 - Good quality design and townscape. Encourage good design. Density making most effective use of land. Tall buildings in areas of high accessibility or at focal points of activity.
Infrastructure: n/a

AMR Indicator:

Core Output Indicator H6 ‘Housing quality – building for life assessments’

KEY Local Output Indicator 71 'Relation of density to London Plan matrix'

KEY Local Output Indicator 72 'Number of tall buildings built outside town centres, Nine Elms and focal points’

Significant Effects Indicator 51 ‘Conservation areas with up to date character appraisals’

Local Output Indicator 73 'Number of grants for Conservation Area Improvements'

Significant Effects Indicator 52 ‘Percentage of Listed Buildings “at risk”’

Significant Effects Indicator 53 ‘Number of listed buildings lost’

IS4 – Protecting and enhancing environmental quality. Supports measures to protect and enhance the environmental quality of the borough and work with partner agencies to help deliver this.
IS5 – Achieving a mix of housing including affordable housing. Existing small-sized houses and flats with gardens to be protected from conversion. Council will seek the maximum reasonable amount of affordable housing on residential schemes of ten or more units having regard to London Plan targets.

Infrastructure: n/a

Phasing: (Housing Capacity Assessment)

<table>
<thead>
<tr>
<th>Year</th>
<th>Identified Housing Capacity</th>
<th>Compared with target of</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007/08 – 2011/12</td>
<td>1460 – 1964</td>
<td>1865</td>
</tr>
<tr>
<td>2007/08 – 2016/17</td>
<td>3093 – 4341</td>
<td>3725</td>
</tr>
<tr>
<td>2007/08 – 2021/22</td>
<td>4523 – 6459</td>
<td>5588</td>
</tr>
</tbody>
</table>

AMR Indicator:

KEY Core Output Indicator H5 ‘Gross affordable housing completions’

Local Output Indicator 75 ‘For schemes including intermediate (shared equity) dwellings, the number of dwellings for households with a gross income of less than £38,000’

Local Output Indicator 76 ‘No of under-occupied social rented homes “freed up” by new social rented units’

KEY Local Output Indicator 77 ‘Type and size of dwelling completions by tenure (market/intermediate/social rented) and type.’

KEY Local Output Indicator 78 ‘Number of family sized units lost through conversion to smaller units’

KEY Local Output Indicator 79 ‘Number of dwellings that meet Lifetime Homes standard’

IS6 – Community services and infrastructure. Community services and the provision of infrastructure. Support the provision and/or improvement of facilities for community services, promote the provision of infrastructure.

Infrastructure:

<table>
<thead>
<tr>
<th>Title</th>
<th>Description</th>
<th>Cost (if known)</th>
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<th>Delivery Timescale</th>
<th>Funding Arrangements</th>
<th>Any other comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improved social and community infrastructure</td>
<td>There is a need to safeguard existing community facilities, but to also ensure that enhancements to existing facilities and new facilities are provided to meet the needs of the growing population. Schemes under construction include: new library, Garratt Lane, SW18; extensions and alterations at Roehampton Recreation Centre, SW15; a new adventure play building, Kimber Road Activity Centre, SW18;</td>
<td>Unknown</td>
<td>WBC and other agencies and charities providing these services.</td>
<td>Ongoing</td>
<td>WBC and other agency funding and through planning agreements where appropriate.</td>
<td></td>
</tr>
</tbody>
</table>
refurbishment of former Granada Cinema, St John’s Hill, SW11 as a church; and a new Scout hall at Jack Skillen Hall, Balham High Road, SW12. Permission has been granted for: refurbishment and extensions to Tooting Library, SW17; a new community hall at 648 Garratt Lane, SW17; a replacement community hall at Lebanon Road, SW18; and a community resource centre at 220-222 Upper Tooting Rd, SW17. Space for a new Wandsworth Museum has been negotiated as part of the Ram Brewery planning permission subject to legal agreement.

Improved health provision

Provision of improved healthcare facilities will include: a new health centre serving North Battersea; a primary care centre at Putney Hospital; enhancements to St Georges Hospital in Tooting; the rebuilding of the mental health care facilities at Springfield Hospital; and improvements to localised healthcare (doctors’ surgeries) including facilities to be provided in major developments. The PCT is working with WBC to produce a Joint Strategic Needs Assessment.

Schemes currently under construction include: a residential mental health rehabilitation unit at Randall Close, SW11; and an adult acute unit and psychiatric intensive care unit at Springfield Hospital, SW17. Permission has been granted for a new treatment centre at St George’s Hospital Chest and Breast Clinic, SW17 and permission subject to a legal agreement has been granted for a primary care centre at Putney Hospital, SW15.

Further & New and extended further

Unknown

Primary Care Trust and other health care providers.

Ongoing

Primary Care Trust and through planning agreements. Use of HUDU is proposed.
| Higher Education | and higher educational facilities. | College and Royal College of Art | | |
|------------------|-----------------------------------|---------------------------------| | |
| Major extension to South Thames College, Wandsworth High Street, SW18 under construction. | | | | |
| Permission granted for a new educational centre for the Royal College of Art in Howie Street/Battersea Bridge Road, SW11 | | | | |

| Secondary Schools | Rebuild or renewal of 16 school premises through Building Schools for the Future. Includes: new 7-form entry Roman Catholic (RC) school on the former Salesian College site; replacing the outdated facilities at Elliott School; new teaching blocks and new or enlarged 6-form facilities at a range of schools. Construction phase to begin in autumn 2010 (Burntwood and Southfields Schools). Work on new RC school and Elliott school due to begin summer 2011. | £250m | WBC | 2016 | National Building Schools for the Future, from Department for Children, Schools and Families (DCSF). |

| Primary Schools | Provision of new and enhanced facilities at primary schools to meet identified and forecast increase in demand for school places. Short term programme contained in the Primary Strategy for Change, which identifies work at 6 schools in Tooting, Balham, Southfields and West Putney. Further enhancements are expected within the life of this plan. | £21.6m short term. Unknown longer term. | WBC | 2011 onwards | Primary Capital Programme (DCSF), WBC Capital Programme, Locally Controlled Voluntary Aided Programme and other minor sources. Longer term it is expected that contributions will be provided through development. Current proposals at Springfield Hospital and Battersea Power Station both propose new primary school provision. |

| Integrated children’s centres | Completion of the borough’s network of integrated children’s centres. Under construction: a new Children’s Centre at Hillbrook Primary School, SW17; refurbishment and extensions to Roehampton Children’s Centre. | Unknown | WBC | 2010 | Sure Start Programme |

| Policing | Provision of a custody centre, patrol base | Unknown | Metropolitan Police and | Ongoing | Metropolitan Police with developer contributions |
appropriate to an employment location and a range of ‘front counters’ in accessible locations, e.g. town and local centres, to support effective policing of the borough.

Police front counter included in outline application for the “Heart of Roehampton” (2008/4552).

<table>
<thead>
<tr>
<th>Thames Tideway Sewer Tunnel Scheme</th>
<th>Implementation of the Thames Tideway Sewer Tunnel Scheme including connection of the combined sewer overflows in the borough.</th>
<th>Total cost of Thames and Lee Tunnels £2.2b</th>
<th>Thames Water, WBC locally.</th>
<th>By 2020</th>
<th>Thames Water are in discussions with Ofwat to find an appropriate financing mechanism.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comprehensive regeneration of Roehampton</td>
<td>Improved housing, new business floorspace, new and improved shops, new library, new community facilities and environmental improvements. Currently at the outline application stage.</td>
<td>Unknown</td>
<td>WBC and public and private sector partners</td>
<td>2015</td>
<td>WBC, public and private sector partners.</td>
</tr>
</tbody>
</table>

**AMR Indicator:**

- Core Output Indicator W1 ‘Capacity of new waste management facilities’
- Core Output Indicator W2 ‘Amount of municipal waste arising and managed by management type’

**KEY Local Output Indicator 81 ‘Amount of community premises floorspace completed’**

**KEY Local Output Indicator 82 ‘Amount of hospital and healthcare floorspace completed’**

**Local Output Indicator 83 ‘Amount of D1 and D2 floorspace completed and in the development pipeline community premises, hospital and healthcare, education and childcare, visitor attraction, arts cultural and entertainment facilities’**

**Significant Effects Indicator 57 ‘Number of visitors to leisure centres (including swimming pools, bowling, cinemas etc.)’**

**IS7 – Planning Obligations. Planning obligations will be sought to ensure that development proposals provide or fund local improvements.**

**Infrastructure: n/a**

**AMR Indicators:**

- Local Output Indicator 84 ‘Number of affordable dwellings delivered through S106 contributions’

**KEY Local Output Indicator 85 ‘Local improvements funded by planning obligations’**
Annex B

SCHEDULE 2 - MINOR CHANGES

The changes below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the change in words in italics.

The page numbers and paragraph numbering below refer to the submission DPD, and do not take account of the deletion or addition of text unless otherwise specified.

<table>
<thead>
<tr>
<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>MC1</td>
<td>10</td>
<td>2.4</td>
<td>Planning Policy Guidance 17, “Planning for Open Space, Sport and Recreation”...&lt;br&gt;<a href="http://www.wandsworth.gov.uk/planning/evidence">http://www.wandsworth.gov.uk/planning/evidence</a></td>
</tr>
<tr>
<td>MC2</td>
<td>11</td>
<td>2.9</td>
<td>Replace:</td>
</tr>
<tr>
<td>MC3</td>
<td>12</td>
<td>2.10</td>
<td>South East of England with south-east England</td>
</tr>
<tr>
<td>MC4</td>
<td>14</td>
<td>2.17</td>
<td>document with Document</td>
</tr>
<tr>
<td>MC5</td>
<td>16</td>
<td>3.1</td>
<td>North Battersea with north-east Battersea</td>
</tr>
<tr>
<td>MC6</td>
<td>17</td>
<td>3.3</td>
<td>Social Objectives, fourth bullet point: Create safer, healthier and more secure communities. In first sentence replace:</td>
</tr>
<tr>
<td>MC7</td>
<td>19</td>
<td>4.3</td>
<td>space with floorspace</td>
</tr>
<tr>
<td>MC8</td>
<td>19</td>
<td>4.4</td>
<td>70s with 1970s</td>
</tr>
<tr>
<td>MC9</td>
<td>23</td>
<td>PL1</td>
<td>Insert Map 2 ‘Priority Area Overview’ in Appendix A and subsequently renumber Maps throughout the document.</td>
</tr>
<tr>
<td>MC10</td>
<td>26</td>
<td>4.17</td>
<td>The Regional Flood Risk Assessment (RFRA) carried out on behalf of the GLA to assess the London Plan demonstrated that 40% of land within the area of the Opportunity Areas, including all the part of the Vauxhall/Nine Elms/Battersea Opportunity Area within Wandsworth, are within the medium to high risk flood zones.</td>
</tr>
<tr>
<td>MC11</td>
<td>27</td>
<td>PL2a</td>
<td>The development of appropriate sites within Flood Zone 2, 3a and 3b in the Wandle Valley and the Thames Riverside will be permitted in principle in terms of the Sequential Test. However, proposals for individual sites within these Flood Zones must comply with the Exceptions Test of PPS25...</td>
</tr>
<tr>
<td>MC12</td>
<td>28</td>
<td>Map 3</td>
<td>Indicative Flood zones and development sites</td>
</tr>
<tr>
<td>MC13</td>
<td>30</td>
<td>4.27</td>
<td>The promotion of cycling through the provision of cycle route and better conditions on routes used by cyclists plays an important part of in a balanced</td>
</tr>
</tbody>
</table>
MC14 31 PL3d  Land will be safeguarded for future transport functions where necessary. Specific sites will be identified in the Site Specific Allocations Document.

MC15 31 PL3f  ...(the Thames pPath, Capital RIng...)

MC16 36 PL4a  The Council will protect and improve public and private open space and improve the open space network in the borough, including Metropolitan Open Land, such as the major commons, parks, allotments and playing fields as well as the smaller spaces, including play spaces, as identified in the Open Space Study and Play Strategy.

MC17 36 PL4d  The Council will require contributions towards new or improved facilities, or to secure public access to private facilities in appropriate developments, and as a priority in areas identified as deficient in open space, play space or sport and recreation facilities and/or to meet priorities identified in the Council’s Play Strategy and Sports Strategy.  

**Replace:**

MC18 38 4.36  twenty year and ten year with 20-year and 10-year

MC19 39 4.39  After last sentence add:  

The Annual Monitoring Report will continue to provide updated information on the housing land trajectory and in identifying sites for housing development.

MC20 40 4.40  ... Latest forecasts from the GLA predict that by 2021 the number of jobs in the borough could increase by up to 23,000 to a total of over 150,000 jobs (2007).

MC21 40 4.41  Replace:

70s with 1970s

**Last sentence:**

Wandsworth is largely a small firm economy, with 90% of firms employing fewer than ten people. New employment space should be designed to meet the likely future needs of Wandsworth’s businesses, most of which tend to be...

MC22 40 4.41  Replace double quotation marks with single quotation marks.

MC23 40 4.42  In eCentral Wandsworth and the Wandle Delta...

MC24 40 4.44  Replace double quotation marks with single quotation marks.

MC25 41 4.45  In eCentral Wandsworth and the Wandle Delta...

MC26 42 4.49  Replace double quotation marks with single quotation marks.

MC27 42 4.50  Replace double quotation marks with single quotation marks.

MC28 42 4.51  However, given the emphasis of on promoting employment in accessible locations...
<table>
<thead>
<tr>
<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
</tr>
</thead>
</table>
| MC29      | 42   | 4.52             | *Penultimate sentence:* The units should incorporate communal facilities for users and customers and ensure disabled access throughout.  

*Sixth sentence:* The evidence base, including the Employment Land Study, also indicates that many of the smaller industrial areas still fulfill an essential function... *(See section ‘Meeting the needs of the local economy’ and Policy PL6).*  

| MC30      | 45   | 4.54             | The Council’s Business Improvement Scheme, a loan and grant scheme helping improve the business environment and promoting business growth and private sector investment, is targeting the Stewarts Road area in the Queenstown Road SIL Battersea and Garratt Business Park in the Summerstown SIL, two key areas of the strategic employment reservoir.  

*Second sentence:* These sites, which generally need to be 0.3 ha...  

*Add at the end:*  

> Additionally they will need to be considered against the locational criteria set out in Annex E of PPS10, Planning for Sustainable Waste Management.  

| MC33      | 47   | PL7b(ii)         | *Remove first sentence.*  

| MC34      | 48   | 4.59             | *Last sentence:* They are backed up by nine local centres and twenty-four Important Local...  

| MC35      | 51   | 4.65             | Balham – ...including independent shops, daily street market, and a weekly farmer’s market.  

| MC36      | 51   | 4.66             | *Last sentence:* In line with National Guidance (PPS6), the London Plan and the Council’s Cultural Strategy, the town centres...  

| MC37      | 52   | 4.68             | *Replace:*  

| MC38      | 52   | 4.68             | *Fifth sentence:*  

| MC39      | 53   | PL8d             | *70s with 1970s*  

> ...together with the twenty-four ILPs...  

The town centres, particularly Putney, will remain the focus for office activity. Where it can be demonstrated that existing office space is unsuitable and incapable of being adapted to modern business use and that the building has been appropriately marketed for office use, then a...
<table>
<thead>
<tr>
<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>MC40</td>
<td>55</td>
<td>4.70</td>
<td>variety of town centre uses, including retail, leisure, health and other services, and residential within mixed developments, will be acceptable, subject to the requirements of Policy PL14 in East Putney. Further detail regarding appropriate marketing evidence will be included within the Development Management Policies Document. The provision of suitable space for small and medium sized enterprises will be encouraged. The borough has 8 kilometres of Thames riverside stretching from Putney in the west downstream to Nine Elms in the east...Development has also secured the provision of a riverside path for pedestrians and cyclists and it is now possible to walk or ride along 6.4 kms of the 8 kms or the riverside in the borough, with a further 1.3 kms in the pipeline.</td>
</tr>
<tr>
<td>MC41</td>
<td>55</td>
<td>4.72</td>
<td>Fifth sentence: It provides a unique opportunity to link this off-Thames...</td>
</tr>
<tr>
<td>MC42</td>
<td>57</td>
<td>PL9b</td>
<td>Insert after first sentence: The efficient operation of the wharves will be supported through the protection of routes to the main road network serving protected wharves.</td>
</tr>
<tr>
<td>MC43</td>
<td>57</td>
<td>PL9c</td>
<td>Insert at the end: (see also Policies PL3 and IS1).</td>
</tr>
<tr>
<td>MC44</td>
<td>59</td>
<td>4.77</td>
<td>Penultimate sentence: ...key stakeholders including Merton, Sutton and Croydon Councils...</td>
</tr>
<tr>
<td>MC45</td>
<td>59</td>
<td>4.78</td>
<td>Second sentence: As part of the AFI Framework, the Council is working with Merton Council...</td>
</tr>
<tr>
<td>MC46</td>
<td>60</td>
<td>4.79</td>
<td>First sentence: ...and includes Battersea Power Station...</td>
</tr>
<tr>
<td>MC47</td>
<td>60</td>
<td>4.82</td>
<td>Second sentence: ...around Battersea Park Station...</td>
</tr>
<tr>
<td>MC48</td>
<td>61</td>
<td>4.82</td>
<td>Eighth sentence: ...infrastructure including bus, rail, riverbus...</td>
</tr>
<tr>
<td>MC49</td>
<td>61</td>
<td>4.82</td>
<td>Tenth sentence: ...extending the Charing Cross branch of the Northern Line...</td>
</tr>
<tr>
<td>MC50</td>
<td>61</td>
<td>4.83</td>
<td>Third sentence: The issue of the “Sequential Test”...</td>
</tr>
</tbody>
</table>
**Change No** | **Page** | **Policy/Paragraph** | **Suggested Change**
--- | --- | --- | ---
MC51 | 61 | 4.84 | In brackets:

MC52 | 62 | 4.86 | ...(60,000-sq ms)...

**Fifth sentence:**

MC53 | 62 | 4.88 | ...seeking fresh fruit and vegetables,...

**First sentence:**

MC54 | 63 | PL11a | The Stewarts Road area is identified as a forms part of the Queenstown Road Strategic Industrial Location (SIL) identified in the London Plan and will continue to provide a reservoir of sites for industrial, business and logistical uses, and will also be a preferred location for the siting of further waste management activities.

MC55 | 63 | PL11d | High density mixed use development will be promoted around Battersea Power Station and nearby sites to help create a "sense of place" and a dynamic mixed use quarter, including local shops and services forming a potential CAZ frontage, with improved public transport links.

**Second sentence:**

MC56 | 63 | PL11e | Improvements to public transport will be sought, as well as new public open spaces in line with Policy PL4.

MC57 | 62 | PL11g | The Stewarts Road/Silverthorne Road area, which forms part of the Queenstown Road SIL, will continue to provide a reservoir of employment land for industry, logistics and waste management and enhancements will be sought to the environment and access to the industrial area.

MC58 | 65 | 4.90 | Funding will be sought from planning obligations linked to developments on sites within the eOpportunity eArea.

**Second sentence:**

MC59 | 67 | 4.94 | ...with 4 four high-rise residential blocks...

**Top of page:**

MC60 | 67 | 4.97 | Achieving this vision could lead to the provision of over 2,000 new homes by 2016/17 and 40,000 sq ms of new employment floorspace in the area in the longer term by 2020.

MC61 | 67 | 4.97 | ...improving the Wandsworth eOne-wWay system...

**Last sentence:**

MC62 | 69 | PL12b | ...and Wandsworth Town eStation will also...

MC63 | 69 | PL12f | Development in central Wandsworth and the Wandle Delta should aim to meet targets of at least 2,000 new homes by 2016/17 and 40,000 sq ms of employment floorspace in the longer term.

**First sentence:**

MC64 | 71 | 4.99 | The station remains almost unchanged from its
<table>
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<tr>
<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>MC64</td>
<td>72</td>
<td>4.102</td>
<td>nineteenth 19th century appearance. Third sentence: ...station fit for the twenty-first 21st century.</td>
</tr>
<tr>
<td>MC65</td>
<td>73</td>
<td>PL13c</td>
<td>Enhanced linkages to the north of the Station and town centre, notably to Falcon Road and Winstanley Road, and re-structuring of the area to the north of the station can be achieved through new mixed-use development with quality street frontages, particularly to Grant Road, and enhanced public realm.</td>
</tr>
<tr>
<td>MC66</td>
<td>73</td>
<td>PL13b</td>
<td>Fifth sentence: Development at Clapham Junction and other sites in and around the town centre should aim to meet targets of at least 500 homes in the medium term rising to 1,500 with the development of all identified sites by 2023/24, with up to 30,000 sq ms of employment space.</td>
</tr>
<tr>
<td>MC67</td>
<td>76</td>
<td>4.107</td>
<td>Last sentence: The Upper Richmond Road frontage fulfills...</td>
</tr>
<tr>
<td>MC68</td>
<td>76</td>
<td>4.109</td>
<td>Third sentence: The Retail Needs Study 2008 Retail and Town Centre Needs Assessment, 2008 projected...</td>
</tr>
<tr>
<td>MC69</td>
<td>77</td>
<td>4.110</td>
<td>Last sentence: ...no harm to the amenities amenity of adjoining properties...</td>
</tr>
<tr>
<td>MC70</td>
<td>77</td>
<td>4.111</td>
<td>Second sentence: ...while East Putney has a tube an Underground station...</td>
</tr>
<tr>
<td>MC71</td>
<td>80</td>
<td>4.115</td>
<td>Last sentence: ...Clapham Junction and Victoria stations.</td>
</tr>
<tr>
<td>MC72</td>
<td>83</td>
<td>4.118</td>
<td>Insert following paragraph after 4.118 and subsequently renumber paragraphs throughout the document: A Health Impact Assessment should consider the potential impacts of development on health and should identify changes and actions to enhance the positive effects and mitigate, or eliminate the negative effects of development. Health Impact Assessments may be integrated with the Environmental Impact Assessment and sustainability appraisal process. More details will be set out in the Development Management Policies Document.</td>
</tr>
<tr>
<td>MC73</td>
<td>83</td>
<td>4.122</td>
<td>Fifth sentence: Increased levels of walking and cycling can have beneficial health impacts, such as encouraging...</td>
</tr>
<tr>
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<td>Policy/Paragraph</td>
<td>Suggested Change</td>
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<tr>
<td>-----------</td>
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<td>------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>MC74</td>
<td>84</td>
<td>4.125</td>
<td>physical activity and improving air quality, as well as wider sustainability benefits. Replace: document with Document</td>
</tr>
<tr>
<td>MC75</td>
<td>85</td>
<td>IS1b</td>
<td>Second sentence: ... TfL’s best practice guidance, and construction management and servicing and delivery plans where appropriate.</td>
</tr>
<tr>
<td>MC76</td>
<td>85</td>
<td>IS1c</td>
<td>Last sentence: Detailed parking standards, and servicing and delivery requirements, in line with the London Plan, will be set out in the Development Management Control Policies Document. Third sentence:</td>
</tr>
<tr>
<td>MC77</td>
<td>88</td>
<td>4.130</td>
<td>Good design is also key to creating a sense of place, well-being and a healthy and safe environments, by as well as reducing crime, the fear of crime and anti-social behaviour, encouraging physical activity and active travel and making developments accessible and inclusive, including facilities for people with disabilities. Last sentence:</td>
</tr>
<tr>
<td>MC78</td>
<td>90</td>
<td>4.134</td>
<td>...increase in the number of one- and two-person households. Include new point e as follows:</td>
</tr>
<tr>
<td>MC79</td>
<td>91</td>
<td>IS4</td>
<td>Ensure efficient water management to reduce the impact of water take on the Wandle Catchment. Last sentence:</td>
</tr>
<tr>
<td>MC80</td>
<td>92</td>
<td>4.139</td>
<td>...one- and two-person households. Second sentence:</td>
</tr>
<tr>
<td>MC81</td>
<td>92</td>
<td>4.140</td>
<td>...one- and two-bedroom flats. Remove penultimate sentence. Second sentence:</td>
</tr>
<tr>
<td>MC82</td>
<td>92</td>
<td>4.140</td>
<td>...including the Council’s ‘Hidden Homes’...</td>
</tr>
<tr>
<td>MC83</td>
<td>93</td>
<td>4.144</td>
<td>Fourth sentence:...such relevant Government or other...</td>
</tr>
<tr>
<td>MC84</td>
<td>94</td>
<td>4.145</td>
<td>First sentence: The “Lifetime Homes” ‘Lifetime Homes’ standard...</td>
</tr>
<tr>
<td>MC85</td>
<td>95</td>
<td>4.148</td>
<td>First sentence: The Council has a long-established Gypsy and Traveller site at Trewint Street with 10 currently with 12 residential pitches. Capacity will be reduced to 10 pitches to meet new standards.</td>
</tr>
</tbody>
</table>
Life expectancy is a good overall indicator of health in Wandsworth and evidence suggests that health inequalities are correlated with deprivation. For men, the average age of life expectancy differs from 73 years in Latchmere, the most deprived ward, to 81 years in Thamesfield, which is one of the most affluent wards. The pattern is similar for women: 79 years in Latchmere and 83 years in Balham.

The future health challenges facing the borough are:

- A greater disparity in health and life chances between residents of different parts of the borough.
- A youthful population making poor lifestyle choices affecting their health
- The extent of mental health illness amongst the adult population
- Specific ethnic groups having higher risk factors for long term conditions, such as diabetes, cardio vascular disease (CVD), chronic obstructive pulmonary disease (COPD) and coronary heart disease (CHD).
- Higher levels of obesity in deprived wards, particularly among children.

Some of the factors that influence health and wellbeing are poor diet, inadequate levels of exercise, transport, housing and financial constraints and spatial planning has a key role to influence these determinants.
strategy to establish polysystems across the borough. A polysystem is an integrated network of services delivered from a central hub (polyclinic) and a range of other sites (spokes) within a local community. A polysystem will provide patients with greater access to services closer to home and avoid unnecessary hospital visits. The Council will work closely with the PCT to identify the detailed infrastructure requirements arising from the polysystem strategy and will revise the Infrastructure Delivery Schedule, at Appendix 1, accordingly.

Penultimate sentence:

...in the last five years.

Penultimate sentence:

...skills and child-care childcare provision...

Penultimate sentence:

Additionally, government agencies...

Last sentence:

...in the Council’s ‘Play Strategy’ and ‘Parks Management Strategy’...

Second sentence:

Policy IS6 and supporting text sets out the programmes of some agencies including NHS Wandsworth, the Wandsworth PCT, who are developing a strategy to establish polysystems in the borough, consulting on the location of new local hospital/improved GP facilities in Battersea/north Wandsworth, the London Strategic Health Authority who are consulting on the options for the development of polyclinics, and the South West London and St George’s Mental Health NHS Trust which is preparing a masterplan for mixed health facilities and other development on the Springfield University Hospital site.

Indices of deprivation in Wandsworth and regeneration areas.

...Roehampton to Barnes Station...

Under Government Legislation...

Appendix 1 – Infrastructure Delivery Table

PL3: Interchange improvements at Clapham Junction

Add additional row to the Infrastructure Delivery Table at the end of the section under PL11 to include following information:
Table  
**Title:** Public open space  
**Description:** New public open spaces to serve the area in the form of a series of linked urban squares or linear park  
**Cost (if known):** To be determined  
**Delivery Agency:** Developers/WBC  
**Delivery Timescale:** Ongoing to 2020  
**Funding Arrangements:** Funded/delivered as an integral part of planning obligations  
**Any other comments:** Further details to be provided in the SSAD

**MC102 16 Appendix 1 – Infrastructure Delivery Table**

**PL13:**  
Interchange improvements at Clapham Junction

**MC103 21 Appendix 1 – Infrastructure Delivery Table**

**IS6 Infrastructure**  
**Funding Arrangements:** Primary Care Trust and through planning agreements. Use of HUDU model is proposed as one method to help calculate financial contributions towards health facilities and services.  
**Any other comments:** NHS Wandsworth is developing a borough wide strategy to establish polysystems in the borough. The Council will work closely with the PCT to identify the detailed infrastructure requirements arising from this strategy through the Site Specific Allocations Document, the Vauxhall/Nine Elms/Battersea Opportunity Area Planning Framework and the Annual Monitoring Report Process.

**Throughout document**

*Replace:*  
Development Control Management  
 Policies Document

**Throughout document**

*Replace:*  
Century with century

**Throughout document**

*Hyphenate the following terms:*  
high-risk, high-rise, low-rise, under-15s,  
10-year, 20-year, 100-year, year-olds,  
self-contained, one-way, large-scale,  
smaller-scale, small-firm, self-sufficient,  
social-housing, family-housing, north-east Battersea, south-west, well-being,  
employment-led, employment-generating, longer-term, small- and medium-sized, cargo-handling, freight-related, tariff-based, financial-contributions, food-related, residential-led, north-south, river-related, trip-generating, post-war, night-time,
<table>
<thead>
<tr>
<th>Change No</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Suggested Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Throughout document</td>
<td>Remove the hyphens in the following terms:</td>
<td>site specific, ongoing, mixed use.</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>sub-region with subregion</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>web-site and web-site with website</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Where reference is made to Wandsworth as the Borough, replace:</td>
<td>Borough with borough</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Where reference is made to the council, replace:</td>
<td>“council” with Council</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Where reference is made to a policy number, replace:</td>
<td>policy with Policy</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>Autumn with autumn</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>central Government and national Government with central government and national government</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>Flood zone and flood zone with Flood Zone</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>Wandle delta with Wandle Delta</td>
<td></td>
</tr>
<tr>
<td>Throughout document</td>
<td>Replace:</td>
<td>river Wandle with River Wandle</td>
<td></td>
</tr>
</tbody>
</table>
Appendix A

Policy PL1 (Page 22)  
'Map 2 – Priority Area Overview'
Policy IS3 (Page 89)
'Map 15 - Broad locations where tall buildings may be appropriate'