

Submission in response to the consultation on Wandsworth Draft local Plan – November 2020

17th March 2021

Preliminary comment

Formal consultation on Local Plan must be held in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 which sets out what Local Planning Authorities are required to do in relation to the preparation of a Local Plan. Although there is no specific duration for such consultation, the common practice is to allow a 12-week period (sometimes more). For example, the draft new London Plan (525 pages) was published in December 2017 and was followed by a three-month consultation; the draft Local Plan for the London borough of Haringey was initially set to last for 11 weeks, however they notified of an extension of the consultation period for an additional 4 weeks (for a total of 15 weeks) explaining:

“We note that it has been a particularly challenging time to respond to a consultation so we have left our dedicated engagement website open for comment until 1 March 2021.”¹

We fail to understand why Wandsworth has refused to consider the constrained expressed by CJAG and seconded by the Battersea Society at the Forum meeting on 20 January 2021, clearly stating that even with the pandemic and lockdown affecting the country, only 8 weeks were allowed for unpaid volunteers in community groups to scrutinize the dense 416 pages of the Local Plan, the 163 pages of the new Sustainability appraisal and the 26 policies maps. And not even considering the 152 pages of the dense Issues Document Consultation Statement that need to be compared to seek responses from the planners to previous comments.

In addition, the poor consideration given by Wandsworth Council to previous consultations does not encourage the consequent amount of effort necessary to provide a detailed response. Just as a reminder:

- CJAG's proposal for planning reforms² published in May 2018: **No response** from the Council, despite repeated promises from Cllr Guy Humphries³, current chair of the Planning Application Committee for Wandsworth.

¹ <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/new-local-plan-first-steps-engagement>

² <https://cjag.org/2018/05/03/our-aspirations-to-reform-planning-decisions-in-the-borough-of-wandsworth/>

³ <https://cjag.org/2019/07/16/planning-forum-meeting-3rd-july-2019/>

- Consultation on Community involvement in January 2019⁴: **No response/No output.**
- Consultation on draft Local Plan in March 2019⁵: **No response or information a year later/output → only available 21 months later, in November 2020**
- Workshop to discuss the future Local Plan on 17 January 2020 + written contribution from CJAG⁶: **Output ?**

For the past 10 years, our comments were systematically dismissed. Societies and community group in Wandsworth teamed together to publish an open letter, which said: "Wandsworth Borough Council is falling far short in putting localism into practice in its planning procedures. It has failed to listen to its residents and the groups that represent them, on numerous occasions." The Putney Society, an amenity society founded in 1959, refused to take part to the local plan consultation in 2015 for those reasons.

The only proper consideration received for our submissions was during the government inspector's examinations. As a reminder, it led the inspector to write in July 2015 that the "[policy] documents as a whole are ineffective", which is exactly what we said and was ignored by the Council.

Time is our most valuable asset, it can never be recovered, recycled or otherwise returned to us once spent. Why is this important, you ask? Because the process involved in attempting to exercise our democratic rights through due process seems to have been a great waste of time in the past. Time that could have been spent in more fruitful attempts at enhancing the comfort and value of our lovely borough.

However, we have great faith and aspiration and once again, we have dedicated much time in preparing this submission, in the hope that it will receive proper consideration and result in substantive changes in the Council policies.

General Comment

A majority of section 2 Strategic Context, Vision and Objectives appears to be a mix of political agenda and wishful thinking.

In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we expressed concerns that "The vision is a list of generic principals that could easily be applied to Birmingham or Liverpool." No comment was received from the Planners⁷.

⁴ <https://cjag.org/2019/01/10/consultation-on-community-involvement-great-principles-but-in-practice-no-improvement/>

⁵ <https://cjag.org/2019/03/05/consultation-on-draft-local-plan-response-from-societies-and-cjag/>

⁶ <https://cjag.org/2020/02/06/wandsworth-runs-a-workshop-to-discuss-the-future-local-plan/>

⁷ Page 11 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

We were puzzle by the structure of the plan, choosing to start with what we consider a long political pledge, and immediately after moving to specific area strategies. Global policies such as Housing, Transport and Economy are addressed later in the document.

Suggest: Move from general to specific

Comments on the draft local plan

1. Introduction

1.1 page 4

| placemaking principles to guide change and support **smart growth** over the next 15 years.

There is a lack of immediate definition of what the planners mean by "smart growth". According to Wikipedia, it means "an urban planning and transportation theory that concentrates growth in compact walkable urban centers to avoid sprawl." It also explains that the term is particularly used in North America while in Europe and particularly the UK, the terms "compact city", "urban densification" or "urban intensification" have often been used to describe similar concepts.

However, it seems obvious that for the general public, urban intensification and urban densification are not popular, especially in the current aspiration for a greener more ecologically friendly living environment (and actually, Wandsworth Council has set itself the target of becoming the greenest borough in inner London⁸, isn't it?).

"Smart growth" is later (par. 1.9) defined as the ideal place to live (using all superlatives such as "greenest" and "best place"). As it seems obvious that nobody would promote a dystopian vision where it would deliver a bad start of life, in polluted and unsustainable areas, where business is dying. Therefore, instead of twisting an American expression⁹, we strongly encourage to define more accurately the "vision" expressed for the borough of Wandsworth.

Par 1.1. We consider that planners should refrain using American jargon to mislead the UK public and either replace by British English equivalent (i.e. urban densification or maybe instead "new urbanism"). We suggest to use the wording "urban development" as in "to guide change and support ~~smart growth~~ urban development over the next 15 years".

| Whilst facilitating development

⁸ <https://www.wandsworth.gov.uk/news/july-2019/wandsworth-sets-out-green-ambition/>

⁹ <https://smarthrowthamerica.org/our-vision/what-is-smart-growth/>

The Local Plan Review 2018 - Issues Document states, on page 2, that its goal is “to manage change”. This is a more neutral wording that is supported, while the current version means that the local plan first and foremost ambition is to “make easier” planning permission grant, implying that it would be currently more difficult.

Life has not been difficult for developers in Wandsworth for the last 10 years, rather the opposite. A striking example is the current changes in York Road and the Winstanley/York Regeneration Project where the local plan in 2010 was mentioning 5 storeys for places where the Council granted permission for a 20-storey tower in 2018¹⁰. We could make exactly the same comments for many other major sites: B&Q, Smugglers Way - SW18, max 8 storeys in 2010¹¹, granted for 10 to 18 storeys; Homebase, Swandon Way - SW18, max 8 storeys in 2010¹², granted for up to 17 storeys; South Thames College/Welbeck House/17-27 Garratt Lane¹³, sensitive for tall buildings above 4 storey, currently developed with towers up to 26 storeys; Homebase - York Road¹⁴ labelled as “likely to be inappropriate” for buildings above 8 storeys, and currently under-construction with 6, 7, 9, 11 and 21 storeys; 12-14 Lombard Road¹⁵ labelled as “likely to be inappropriate” for buildings above 8 storeys and now with a tower of 28 storeys (granted less than 5 years after the local plan was accepted)... and we could cover several pages with similar cases.

Par 1.1. We consider that using the wording “facilitating” is inappropriate and would like the planners to revert with original wording of “manage change” while highlighting the importance to protect the character of the borough, as in “~~whilst facilitating~~ managing development, the new Local Plan will ~~also~~ primarily protect and enhance what is good and special about Wandsworth...”

1.9 page 5

| Smart Growth.

Where is the justification for using this American jargon, which translate in British English as “intensive development”¹⁶ does seem to bring confusion to the paragraph? As we said earlier, “Smart growth” seems **re**defined by the planners as the ideal place to live (using all superlatives such as “greenest” and “best place”). As it seems obvious that nobody would promote a dystopian vision where it would

¹⁰ Site Specific Allocations Document - Proposed Submission 2010, page 113: “4.1.3 Car park adjacent to Sendall Court, Grant Road, SW11: In accordance with Core Strategy Policy IS3d, tall buildings in this location are likely to be inappropriate. In accordance with DMPD Policy DMS4, the height at which a development in this location will be considered to be tall is 5 storeys.”

¹¹ Site Specific Allocations Document - Proposed Submission 2010, page 105

¹² Site Specific Allocations Document - Proposed Submission 2010, page 104

¹³ Site Specific Allocations Document - Proposed Submission 2010, page 80

¹⁴ Site Specific Allocations Document - Proposed Submission 2010, page 173

¹⁵ Site Specific Allocations Document - Proposed Submission 2010, page 174

¹⁶ See par 3.23 of the draft Local Plan that said: “strategy for growth and intensification to be developed for different parts of the borough”

deliver a bad start of life, in polluted and unsustainable areas, where business is dying. Therefore, instead of twisting an American expression, we strongly encourage to define more accurately the "vision" expressed for the borough of Wandsworth.

NB: In the London Plan 2011, they also used main principles as "LONDON'S PLACES" and "LONDON'S PEOPLE" without the need to rely on the American concept of Smart Growth.

1.9 This paragraph has no purpose at all, rather than bringing confusion, and should be deleted

In our previous submission¹⁷, we said: "The vision is a list of generic principals that could easily be applied to Birmingham or Liverpool. There is no mention of preserving the local environment by preventing bulky and overbearing buildings and promoting developments in relation to neighbouring property, the street and other public spaces and it should be added."

Any new development should aim at minimising the adverse effects on people's day to day lives, and not only "Enabling people to get on in life".

2. Strategic Context, Vision and Objectives

2.2 page 10

it is worth emphasising that the ONS estimate was prepared prior to the COVID-19 pandemic, and therefore does not necessarily reflect potential changes in relation to internal and external migration patterns. It is anticipated that much of this population growth will occur within the investment and growth areas of the borough. This will result in a need for more homes, jobs, services and community facilities, such as schools and healthcare.

The Planners are right to highlight that the estimate was prepared prior to the pandemic crisis and therefore reality is likely to be different. However, it should also consider that, eventually, a Brexit deal was signed and the UK left the EU, making then much more difficult for EU citizens to come and work. It is still to be seen if this will be compensated by migrants from other countries, and in any case the current government announced that they wanted to cut drastically immigration.

In fact, London's population is set to decline for the first time in more than 30 years, driven by the economic fallout from the coronavirus pandemic, people reassessing where they live during the crisis, and Brexit, according to a report published in 2021 by accountancy firm PwC¹⁸. In 2019, net migration of EU citizens to the UK fell to 50,000 people and according to PwC, it could turn negative in 2021 – meaning that

¹⁷ Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

¹⁸ PwC - January 2021 Economic Outlook paper

within the year, the number of EU nationals who leave the UK could be more than those who settle – for the first time since 1993.

It should be little surprise as back in August 2020, a survey by the London Assembly¹⁹ found that 4.5% of Londoners – or 416,000 people – were very likely to move out of the city within the next 12 months. This survey even said that one in seven Londoners (14 per cent) wanted to leave the city as a result of the COVID-19 pandemic, and a third of Londoners (33 per cent) want to move to a new home.

The result is likely to be particularly notable in Wandsworth, as a report from PwC in Partnership with ONS in 2017²⁰ showed that Wandsworth had 20-30% of EU migrants.

Therefore, the pre-Brexit, pre-Covid Wandsworth Population Projections (GLA 2018-Based Housing-Led) is certain to be false. The Census 2021 will likely give more accurate results on the trend, but we publishing a Local Plan providing guidance for the next 15 years cannot be based on outdated and now-invalid data.

2.2 The paragraph and the following parts of the housing projections should be systematically worded with the “pre-Brexit + pre-Covid” precaution and reviewed before final submission to include the latest data. By the time of the Independent Examination in Public late 2022, the trend might be completely opposite to the current 2018 forecast and therefore all evidences produced in this plan would be void, even before publication.

2.5 page 11

There is a strong record of affordable housing provision in the borough with 885 new affordable homes delivered between 2016/17 and 2018/19.

This statement should be elaborated, especially on the meaning of “strong record”, as according to official figures this is grossly misleading.

The London Plan is setting annual targets for London boroughs²¹. As per Wandsworth Core Strategy 2016: “4.189 The SHMA 2012 identified a shortfall of 942 (58 per cent) affordable/social rent units and 686 (42 per cent) intermediate housing units. Given that this is very close to the London Plan 2015 requirement of **60% social/affordable rent and 40% intermediate**, the Council will adopt the London Plan requirement.”

However, for the period 2015/16 to 2019/20, the Council decided that the target should only be nearly the exact opposite: 38% social/affordable rent and 62% intermediate.

¹⁹ <https://www.london.gov.uk/press-releases/assembly/escaping-the-city-post-covid>

²⁰ PwC - Facing Facts: The impact of migrants on London, its workforce and its economy March 2017

²¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2016/london-plan-annexes/annex-four-housing-provision>

More importantly, according to the latest Authority Monitoring Report (AMR)²² figures show that Wandsworth record on providing affordable housing is very weak.

Large Developments by Tenure

Net completions on VNEB sites with developments of 10 or more dwellings, against Local Plan affordable mix targets

Table 8b

Year	Open Market		Intermediate		Social/Affordable Rent		Total Affordable		Total
	Units	%	Units	%	Units	%	Units	%	Units
Target (VNEB)				40%		60%		15%	
2015/16	928	90%	98	100%	0	0%	98	10%	1,026
2016/17	604	80%	126	85%	23	15%	149	20%	753
2017/18	1,181	92%	100	100%	0	0%	100	8%	1,281
2018/19	641	86%	58	55%	47	45%	105	14%	746
2019/20	337	69%	57	37%	96	63%	153	31%	490
Total	3,691	86%	439	73%	166	27%	605	14%	4,296

For the purpose of demonstration, we have recalculated the completed housing provision by tenure for Nine Elms (VNEB) and the rest of Wandsworth and compared with the current policy target of 15% affordable in VNEB and 33% in the rest of the borough.²³

Table 8c Net completions on sites outside VNEB with developments of 10 or more dwellings, against Local Plan affordable mix targets

Year	Open Market		Intermediate		Social/Affordable Rent		Total Affordable		Total
	Units	%	Units	%	Units	%	Units	%	Units
Target (outside VNEB)				40%		60%		33%	
2015/16	982	68%	227	49%	233	51%	460	32%	1,442
2016/17	765	78%	171	78%	49	22%	220	22%	985
2017/18	653	92%	42	72%	16	28%	58	8%	711
2018/19	675	79%	119	65%	64	35%	183	21%	858
2019/20	375	63%	139	63%	83	37%	222	37%	597
Total	3,450	75%	698	61%	445	39%	1,143	25%	4,593

Calculation of global net completions on sites with developments of 10 or more dwellings, against Local Plan affordable mix targets

Year	Open Market		Intermediate		Social/Affordable Rent		Total Affordable		Total
	Units	%	Units	%	Units	%	Units	%	Units
Target				40%		60%			
2015/16	1,910	77%	325	58%	233	42%	558	23%	2,468
2016/17	1,369	79%	297	80%	72	20%	369	21%	1,738
2017/18	1,834	92%	142	90%	16	10%	158	8%	1,992
2018/19	1,316	82%	177	61%	111	39%	288	18%	1,604
2019/20	712	66%	196	52%	179	48%	375	34%	1,087
Total	7,141	80%	1,137	65%	611	35%	1,748	20%	8,889

²² <https://www.wandsworth.gov.uk/authority-monitoring-report-amr>

²³ AMR 2020: <https://www.wandsworth.gov.uk/authority-monitoring-report-amr>

Comparison Target vs Completed based on 15% affordable for VNEB and 33% other locations

Year	Intermediate 40%			Social/Affordable Rent 60%			Total Affordable (15%/33%)		
	Target [1]	Completed	% vsTarget [4]	Target [2]	Completed	% vsTarget [4]	Target [3]	Completed	% vsTarget [4]
Target						60%			
2015/16	252	325	129%	378	233	62%	630	558	89%
2016/17	175	297	170%	263	72	27%	438	369	84%
2017/18	171	142	83%	256	16	6%	427	158	37%
2018/19	158	177	112%	237	111	47%	395	288	73%
2019/20	108	196	181%	162	179	110%	271	375	139%
Total	864	1,137	132%	1,296	611	47%	2,160	1,748	81%

[1] Target of 40% of total affordable units completed, based on theoretical affordable calculation vs completed with 15% for VNEB and 33% for the rest of the borough, 10 units and more.

[2] Target of 60% of total affordable units completed, based on theoretical affordable calculation vs completed with 15% for VNEB and 33% for the rest of the borough, 10 units and more.

[3] Global theoretical affordable target for Wandsworth borough based on completed units

[4] Percentage of reaching the target.

We used conditional formatting to present in red figures missing the targets and in green when it reaches the target and over.

Wandsworth has missed 4 times out of 5 its global target of Social/Affordable Rent units for the last 5 years (and every single year if we exclude VNEB) as shown in the tables above.

The average net completions on sites outside VNEB with developments of 10 or more dwellings, against Local Plan affordable mix targets, taking into account intermediate, is **25%, considerably below the 33% target**²⁴.

For the whole borough, taking into account VNEB, it is **only 20%**. We have calculated that, with VNEB lowest percentage, and according to the total completion, it should be around 25%.

As those figures are known from the planners²⁵, we are surprised they write the opposite in their document.

2.5 “strong record of affordable housing provision” is a false statement and should be deleted.

You will note that this is a comment we already made in February 2019²⁶ in our comment 1.0.16 and it appears here that our objection has been ignored

²⁴ Core Strategy Adopted March 2016: the level of affordable housing which would be viable on individual sites of 10 plus units (gross) - at least 15% in Nine Elms, 33% in the remainder of the borough.

²⁵ Core Strategy, p115 (4.183)

2.31 Corporate Plan and Objectives

The Corporate Business Plan reflects resident priorities, as well as significant policy developments or commitments of the Council. The six strategic objectives in the Plan reflect the Council's priorities

In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we already highlighted the propensity to confound the aspirations of the local community and the choices made by the Council. Speculation over resident priorities should be refrained. We asked not to write “local community” while actually meaning “Council”. The comment was “noted”²⁷, but unfortunately ignored here.

In addition, there was no mention of “**Corporate Plan**” in previous versions of the Local Plan (Core Strategy 2016) and the current listing look like a political pledge of the political party holding the majority of seats on the Council.

2.31 Proposed wording: “The Corporate Business Plan reflects ~~resident priorities, as well as~~ significant policy developments or commitments of the Council.”

2.33-2.34 page 16

Refer to previous comment 1.9 on Smart Growth.

If the planners want to refer to Smart Growth however, we suggest the following definition as found in some US documentation:

“Smart Growth (also called New Urbanism) refers to various policies and planning practices that create more compact and multimodal communities, in contrast to sprawl, which results in more dispersed and automobile-dependent development.”

It must be noted that the concept of Smart Growth has received a number of criticisms²⁸, which should not be ignored. For example, it is acknowledged in the US that it is difficult to quantify some Smart Growth benefits, such as the value communities place on greenspace preservation and improved transportation options for non-drivers.

2.33-2.34 page 19

By 2038 Wandsworth borough will have maintained its special character,

²⁶ Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

²⁷ Page 10 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

²⁸ Evaluating Criticism of Smart Growth 20 November 2018

We want to see a definition of "special character". Is transforming an area of low rise building into a cluster of tall towers a definition of maintaining its special character? The Planners need to elaborate.

2.33 Need a definition of "special character"

In addition, this seems in contradiction (or it needs to be detailed) of the later statement in 3.23 where it says that "areas are considered appropriate for their character to change or evolve, which will be assisted by the targeted Area Strategies."

2.80 page 27

Co-living will be discouraged unless it would be provided on sites that are not suitable for development for conventional units, and it would not result in an over-concentration of single person accommodation in the neighbourhood to which it relates.

2.80 This is supported

2.83 page 28

The borough's town centres will provide a focus for new development.

This is in opposition to previous statements that the Local Plan aims at maintaining the character of the area. Areas outside town centres such as Osiers Road or York Road could be suitable for more development, following the range of application already granted by the Council. However, in town centres with conservation areas and historical building (for example Arding & Hobbs in Clapham Junction) some new developments may be less appropriate.

2.83 Suggest: "The boroughs already developed with high density zones will primarily provide a focus for new development, in respect to the local character of the area."

2.91 page 29

The potential scale of development at Clapham Junction will be dependent on the delivery of Crossrail 2; but the Plan provides sufficient flexibility to be able to accommodate opportunities that could come forward in the shorter term whilst ensuring that a future Crossrail 2 scheme is not compromised.

The delivery of Crossrail 2 is currently out of the 15 years period that the new local plan aims at covering. Therefore, there should be no mention of the relation between the "potential scale" and "Crossrail 2". We acknowledge that the prospect of Crossrail 2 in the future prevents some developments on reserved land for the

project. However, the Council approved plans for the area is already taking into account the increase of public transport need and therefore, on the contrary, the scale of developments at Clapham Junction and their cumulative effects should already affect future prospects.

2.91 Suggest: "Any future provision of housing at Clapham Junction will be dependent on the transport capacity; the Plan will particularly focus on the cumulative impact of developments and their consequence on the provision of public transport."

SS1 Spatial Development Strategy page 31

| The Local Plan will promote growth

Is promoting growth the number 1 priority? Or should it be first to ensure that the Local Plan promotes the best life environment for everyone?

SS1 Suggest: "The Local Plan will promote growth to deliver the Council's vision by directing new development including new homes, shops, economic activity, facilities, services and infrastructure to:"

3. Placemaking – Area Strategies

PM1 Area Strategy and Site Allocations Compliance page 43

| Proposals which do not comply with the Area Strategy and Site Allocations will be resisted unless material considerations clearly indicate that an alternative type of development is appropriate and where the development would be in accordance with all other relevant development plan policies.

This is generally supported. However, there should be additional mention of the overdevelopment, harming the existing character of the area and the cumulative impact of developments.

PM1 should include additional precision:

- In addition, proposals will be resisted if any of the following criteria is met:
- overdevelopment in comparison of existing neighbourhood,
 - harming the neighbourhood and local context
 - risks assessed with the cumulative effect of existing and planned development in the neighbourhood.

6. Area Strategy for Clapham Junction and York Road/Winstanley Regeneration Area

Comments in this section should be read in conjunction with LavenderHillForMe community group suggestions and the Battersea Society submission, which have both produced a detailed analysis of the area.

6.5 page 111

it is anticipated that there could be further potential for offices.

We support.

6.5 page 112

The Council recognises this as unique opportunity both to deliver improvements to the station and to bring forward residential and commercial development as part of the rationalisation of surrounding land, and is working with the Mayor of London and Government to deliver on this potential.

We strongly dispute that it should a "unique" opportunity, and then that it implies a link between improvement to the station and intensification.

We support redevelopment of the zone, and we wrote for example about the potential the arches along Grant Road. However, the current vision promoted by the Council for the past 8 years is in contradiction with the views of the local community.

Plans already approved by Wandsworth Council are in contradiction to existing policy DMT1 that says that "Development [...] will be permitted where it does not have a negative impact on the transport system" and with the NPPF suggesting that developments shouldn't have a significant impact on transport system. In this same paragraph 6.5, it actually acknowledges that "before the Covid-19 pandemic it was operating at close to capacity in terms of rail services and passenger numbers and suffered from over-crowding at peak times."

There is currently no support for the Council vision on Clapham Junction changes, and previous consultation have shown actually the local community was strongly opposing the sort of developments that the Council is promoting for Clapham Junction.

It does not mean that there is no potential for new development, including intensification and more density. But the Council should first concentrate on regaining the trust they lost, and elaborate a strategy in line with the aspirations of the community, unlike what is currently promoted.

We note that the Government has recently directed TfL to cease all work on Crossrail 2 beyond protecting its designated sites. Therefore it is unlikely that any major redevelopment of Clapham Junction station will happen in the interim, which should constraint all developments in the foreseeable future.

We do not accept the naming of Clapham Junction as “a nascent Opportunity Area” unless the surrounding area is impacted by Crossrail 2.

We suggest amendments acknowledging that the area is sensitive and that new developments will need to reach endorsement from the local community.

6.10 page 113

The railway presents a major physical barrier which confines the centre largely to the land south of this infrastructure; fragmenting the area and reducing permeability and legibility. [...] All these factors detract from the generally strong sense of place in the area, creating the need for a strategy which will conserve key characteristics which contribute to the sense of place, notably the historic, modestly scaled shop terraces, and landmark buildings.

The current master plan developed by the Council is actually reinforcing the divide between the north and the south of the railway, with a strong promotion of dense and tall buildings in the north while the south should be preserved with the row of Victorian terrace houses and historical assets such as Arding & Hobbs, The Grand theatre, the Battersea Art Centre...etc.

As we wrote previously about the detrimental impact created by the derelict Falcon Bridge:

There's long been a north/south divide in Battersea, with a 'north' dominated by towers and estate layouts, and a 'south' filled with a sea of Victorian terraces - and performing better on just about any socioeconomic indicator. Having little more than this lugubrious underpass linking the two worlds only reinforces and entrenches this split.

Unfortunately, the current vision expressed by the Council is reinforcing that situation instead of trying to improve the permeability.

PM4 Clapham Junction and York Road/Winstanley Regeneration Area page 116

Tall buildings in Clapham Junction and York Road / Winstanley Regeneration Area will be supported where they are in locations identified as appropriate for tall buildings in Appendix 2, subject to addressing the requirements of Policy LP 4 (Tall Buildings).

Once again, the planners are ignoring the cumulative effect of developments. There is **not mention of that effect and it must be added.**

Facts show that the cumulative effect of developments is not taken into account at a sufficient level by the Council and therefore can create more middle term misery for the area.

In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we responded that “responded that cumulative impacts of developments are not taken into account at a sufficient

level by the Council." The planners responded that "The application of planning policy takes a holistic approach to the assessment of all development proposals."²⁹ Unfortunately, this is not the case and is actually confirmed by proposed policy LP45 saying "each proposal considered on its merits".³⁰

Although Clapham Junction is marked with excellent PTAL, the planners have acknowledged earlier that the station is already at capacity – without even taking into account ongoing future constructions.

Therefore, the PTAL criteria should not be the consideration for increasing density.

We suggest additional policy criteria being:

"Density and tall building cumulative impact will be assessed when considering further development for the Clapham Junction area."

Office space

PM4 – E p117 – New office provision will be supported as part of the mixed use redevelopment of growth sites

We consider that the plan is focusing on increase of housing provision and underestimate the demand for office space, which implies a lack of ambition on promoting Clapham Junction as a place for offices. For example, the draft Local Plan says: "Proposals should re-provide at least the existing quantum of office floorspace".

PM4 - Smart Growth – E: We consider that there is additional detail to promote Office Space in Clapham Junction et we suggest the it should be reinforced.

The recent approved development for Arding & Hobbs should be mentioned.

We support comments from LavenderHillForMe³¹:

Placemaking Point K: We **propose** that the long view along Lavender Hill towards the cupola on the roof of Arding and Hobbs / Debenhams should be added to this list (our photo below to illustrate). It is a well-known view and one that is widely recognised as a local landmark (and even if we recognise that this view is not under immediate threat, it is worth noting that the proposals for redevelopment of the Debenhams site were amended during the consultation process specifically in order to protect this view).

²⁹ Page 17 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

³⁰ Draft local plan page 340

³¹ Lavender Hill for Me community forum – RESPONSE FORM Consultation on the Pre-Publication Draft Local Plan



PM4 Clapham Junction and York Road/Winstanley Regeneration Area - Smart Growth p117

Development in this area is expected to provide at least 1,714 homes by 2037/38. [...] Winstanley and York Road regeneration will contribute to meeting this objective by delivering up to 2,550 homes.

There is a contradiction with the total 1714 figure in Clapham Junction and York Road/Winstanley Regeneration Area and the 2550 only for York Road/Winstanley Regeneration Area. It needs to be corrected. The forecast assumed by the planners for 2037/38 might be $2550 + 1714 = 4264$.

P117 Suggested: "Development in this area is expected to provide at least ~~1,714~~ 4,264 homes by 2037/38"

PM4 Clapham Junction and York Road/Winstanley Regeneration Area - Smart Growth p117

Proposals for larger retail provision should be prioritised in the Core Frontages, focused around Clapham Junction Station and on St John's Road.

The Council has just granted permission for the opposite: Proposal (p.a. 2020/3421) made by W.RE (W. Real Estate limited), to redevelop Arding & Hobbs building at Clapham Junction, has been approved by Wandsworth Council. It includes a drastic reduction of the retail floorspace – from five full floors, to just part of the ground and basement.

You will note that Societies and Community groups objected against that sheer reduction of large retail space, but the Council decided to dismiss the concern.

PM4 Clapham Junction and York Road/Winstanley Regeneration Area - People First p117

York Road/Winstanley Regeneration Area is the subject of an agreed master plan prepared in collaboration with the community.

This is a lie, and should be retracted from the local plan (CJAG has already made the same comment countless times).

P117 Suggested: "York Road/Winstanley Regeneration Area is the subject of an agreed master plan prepared ~~in collaboration with the community~~ by Wandsworth Council."

Site Allocations

CJ1 ASDA, LIDL and Boots sites, Falcon Lane, SW11 page 121

The site allocation is poorly detailed and we regret that no previous community engagement response was considered when redacting this section. The lack of connection with the town centre is mentioned but no proposal is formally made to remedy. The document says there are elements which detract from the sense of place, "creating the need for a strategy which will conserve key characteristics which contribute to the sense of place, notably the historic, modestly scaled shop terraces, and landmark buildings" and we fail to understand how that translate into the vision for the site.

No consideration is given to the fact that the core area of Clapham Junction, including the station, is currently the heart of a **conservation area**.

Conservation area matters

Focusing on Clapham Junction area there is an absence of Map for Conservation area in the Local Plan. Therefore, we will refer to the current Map of Heritage Assets³² for comments.

The designation of the station area as "conservation area" raises many questions:

1. Why are the new 8-storey Travelodge hotel and the new adjoining properties with the same owner (erected in 2013-2014) included into the conservation area? Local residents will still remember the 16-storey tower that was suggested (by the Council officers, according to the architect) in 2009 to replace a 4 storey-office building. Being in the conservation area did not prevent the Council to approve a scheme at odd with the scale of the neighbouring properties.

In addition, the map does not mention the house #22 Mossbury Road in the local assets list (the house is one of the oldest in Battersea, dating from the very first years of the nineteenth century and so about 200 years old). That house is mentioned in

³²

https://maps.wandsworth.gov.uk/map/Aurora.svc/run?script=%5cAurora%5cpublic_conservation_areas.AuroraScript%24&nocache=751150328&resize=always

the tithe map of 1838. The OS map of 1896 shows the current layout of Mossbury road with most of the existing terrace houses allegedly built by developer Alfred Heaver. Therefore, it would make more sense to include the whole of Mossbury Road into the conservation area, rather than only the part that has actually been recently constructed with modern structures.

2. We support keeping the whole of the train station within the conservation area. However, we wonder about the seriousness of the Council regarding the treatment of the conservation area in view of the past plans (residents will remember the 42-storey skyscraper plans) and the current discussions we have with Network Rail. According to historicengland.org.uk, "Conservation area provides a basis for planning policies whose objective is to conserve all aspects of character or appearance, including landscape and public spaces, that define an area's special interest". There is a lack of understanding how the Council can adhere with this definition and consider schemes aiming at changing drastically the layout of the area. This needs to be clarified.

Falcon lane realignment and development

First of all, it must be considered that the rear gardens (between 1 and 2 meters deep) of Mossbury Road properties are so tiny that any development in front will strongly affect their privacy beyond dispute.

OAK Trading (which developed the Travelodge hotel at 155 Falcon Rd) objected in previous Planning consultation that any new residential development above ground floor level would surely need south facing windows which could harm the amenity of the houses in Mossbury Road (although there could be some mitigation by offering extension of existing properties by land purchase).

Any reasonable view will concede two realistic solutions:

1. to offer extension of existing properties by land purchase,
2. to redevelop the open area with public space/square, which is in line with PM4, saying: "The development opportunities set out within this Area Strategy offer the prospect for inclusive public realm and open space provision to reinforce connectivity, support wellbeing and contribute to quality of life."

Retail

Most of the area is occupied by Class E buildings. With the recent loss of Debenhams Asda and Lidl are now the most important employers at Clapham Junction. Any further loss of retail provision will be highly damageable for Clapham Junction.

It is suggested to safeguard the Class E provision on those sites. To go further, the lack of large premises available in the location has been an important element in the decision to pause Lidl development (see below).

Lidl site

It must be noted that Lidl has tried to find a temporary site to continue operating while redeveloping the site and was unable to do it. As a consequence, Lidl has currently paused the project (the current planning permission p.a. 2017/2972 will run out in 2027).

One of the aims of the proposal was to bring a more active frontage on Falcon Road (similar to Sainsbury in Fulham, Townmead road), where one entrance will be located, and attract more people coming from the station.

Active frontage facing Falcon Road should be encouraged on this site.

Boots site

Boots Clapham Junction occupies a 0.77 acre site situated on Falcon Lane situated a few metres to the east of Clapham Junction railway station. The Boots site is actually not extending to the railway due to the location of the rail exchange building. A development of a series of buildings up to 11 storeys was proposed in 2018, mostly seen as a valuation exercise and was considered as overdevelopment by the community, with great impact on the nearby properties.

Asda site

The Asda car park is a "town centre" car park where you can park for free for 2 hours (£10 for 24h). Therefore, any redevelopment removing this facility will create detrimental effect for the entire area of Clapham Junction and must be prevented.

A path exists for pedestrian to join Falcon Lane and Dorothy Road, through Asda car park, and must be preserved.

There is an opportunity to redevelop and optimise the use of the Asda site. Although taller buildings could be located toward the railway line, the site is surrounding by lower 2-3 storey Victorian terrace houses and therefore it prevents high rise closer to the neighbouring properties and directly facing Lavender Hill. It was properly considered in the SSAD 2009 which said:

Site Allocation (2009 version, p85): Tall buildings would be best located towards the railway frontage to reduce their impact on the residential area of Mossbury Road, and the conservation area.

The Asda site is sensitive and must be carefully assessed in order to preserve the Clapham Junction area south of the railway, including the views with the iconic building of Arding & Hobbs.

It should be noted that:

- Active frontage is encouraged on Falcon road.
- Due to the site being surrounded by lower 2-3 storey Victorian terrace houses, tall building should be refrained. However, carefully designed taller building could be appropriately placed along the railway, especially for Boots and Asda sites.
- Permeability is essential and it must be noted that access to Dorothy Road from Falcon Lane (through Asda car park currently) must be preserved.
- Any development should abide the minimum separation distances of 18-21 meters, as per the London Plan, and should consider a land offer for properties fronting Mossbury Road to prevent over-shadowing and privacy issues.
- The current Asda car park is used as a town centre car park. Therefore, it will act as a constraint that should be included in any proposal, to maintain this provision.

CJ2 Clapham Junction Station Approach, SW11 page 122

| The tunnel under Falcon Road is expected to be made more pedestrian friendly

Nobody likes the Falcon Road railway bridge. Dark, dirty, loud and always mysteriously wet, the prospect of running the gauntlet of drips from the leaky bridge structure (or – worse – from the many resident pigeons) discourages non-residents from venturing up the Falcon Road. But like it or not, it's unavoidable lowlight for those of us who live north of the railway.

This isn't good for Clapham Junction. There's long been a north/south divide in Battersea, with a 'north' dominated by towers and estate layouts, and a 'south' filled with a sea of Victorian terraces – and performing better on just about any socioeconomic indicator. Having little more than this lugubrious underpass linking the two worlds only reinforces and entrenches this split.

The grim and faintly menacing nature of Falcon Bridge also limits the trade for the businesses on the Falcon Road – which don't see much benefit from being so close to St John's Road and the otherwise successful wider shopping district.

Therefore, it should be a primarily concern for Wandsworth Council (through CIL funding maybe?) rather than waiting private developers to use this opportunity to balance otherwise undesired proposals.

Concept proposal

It is worth mentioning that a concept proposal was published in 2019 for the full redevelopment of Clapham Junction station and wider area. The plans were

developed by consultants Mott MacDonald, contractor Laing O'Rourke and architect Hawkins Brown, and is at this early stage more of a concept of how things could look, rather than the final masterplan of what will be built, according to the well informed ianVisits blog.

According to their own statement, their aim is "to encourage in depth debate with other industry experts and stakeholders on how to translate enthusiasm for oversite development into deliverable plans."³³

The most important element is the careful approach to tall building on this site (mostly preventing) and the idea of erecting a deck above the tracks with buildings above.

CJ3 Land on the corner of Grant Road and Falcon Road, SW11 page 124

Arches along Grant Road

There would be some merit in cleaning, lighting and painting the overhanging viaduct along Grant Road, where the small businesses in the dozen or so railway arches have long struggled to attract the footfall that you'd expect for the edge of a major shopping district with almost 100% occupancy of retail units, next to one of the UK's busiest railway stations.

This is an interesting structure that could look good with a bit of TLC and some of the arches are impressively large – but it feels like there's a great deal of missed potential here. Derelict and abandoned vehicles in the car park under the viaduct only add to the general feeling of decay and neglect. Any improvement would go some way to making these feel a bit more like a part of the town centre worth visiting.

Everyone stands to benefit from this – it's helpful to the retail centre, to residents, to developers. As a very central and visible bridge with huge levels of pedestrian traffic, and scope for quick implementation, any improvement ought to play well politically. It's probably essential before the Winstanley development really gets going at scale.

Bramlands site

The current vision presented by the Council is to build a cluster of very tall building on the location.

In February 2015, John Stone (Head of Forward Planning and Transportation, Wandsworth Council) wrote:

³³ <https://cjag.org/2019/04/15/concept-proposal-unveiled-for-the-full-redevelopment-of-clapham-junction-station-and-wider-area/>

Development of this site is a crucial element of the overall Winstanley and York Road regeneration proposals and the viability of the overall scheme is entirely dependent on the early development of this key site.

However, it was later confirmed that this area would remain safeguarded for Network Rail. We know nowadays that arguments raised by the Council were exaggerated and did not prevent the continuation of the regeneration project.

It must be noted that the 2013 consultation which included a choice between several options for the Winstanley and York Road estates regeneration was not consulting on the Bramlands site: all options presented a similar development for this site. It was later revealed in a 2014 exhibition that the Council vision includes a cluster of several buildings of more than 20 storeys for this location.

It was in breach of previous Urban Design Study (2009) which was stating:

"Applications for buildings of more than 6 storeys will generally be unacceptable, and will only be considered in exceptional circumstances."³⁴

CJ4 Land at Clapham Junction Station, SW11 page 125

Concept proposal

It is worth mentioning that a concept proposal was published in 2019 for the full redevelopment of Clapham Junction station and wider area. The plans were developed by consultants Mott MacDonald, contractor Laing O'Rourke and architect Hawkins Brown, and is at this early stage more of a concept of how things could look, rather than the final masterplan of what will be built, according to the well informed ianVisits blog.

According to their own statement, their aim is "to encourage in depth debate with other industry experts and stakeholders on how to translate enthusiasm for oversite development into deliverable plans."³⁵

This proposal includes really tall building, especially towards Grant Road. The main idea is to erect a deck above the tracks with buildings above. Any building on such deck will start already at 6-8 floors and therefore will be immediately considered as a tall building.

CJ4 page 125: It should be noted that in order to assess the size of any building above the tracks, the distance from the ground will be added, which will trigger the consideration on tall buildings and impact on the vicinity.

³⁴ Wandsworth Stage 2 Urban Design Study (S2UDS) – Tall Buildings (December 2009) page 22

³⁵ <https://cjag.org/2019/04/15/concept-proposal-unveiled-for-the-full-redevelopment-of-clapham-junction-station-and-wider-area/>

Tall buildings facing St Johns Hill will be unappropriated and therefore prevented as it will have detrimental impact of historical assets of the Junction and the character of the area.

CJ5 Winstanley/York Road Regeneration Area, SW11

We consider the current proposal as inappropriate for the redevelopment for the area.

The delays in the construction phases, and the deferring of the 32-storey tower presented in January 2021 should create an opportunity to

- “rethink” the entire scheme
- reduce the size of the towers and massing of the proposal,
- improve further the provision of social and affordable housing and
- engage truly with local community in a constructive dialogue.

Site Allocation: Territorial Army Centre, 27 St John’s Hill.

The Clapham Junction Action Group propose that the Territorial Army centre site should be added as a new site allocation.

The Territorial Army premises sit between the listed Grand Theatre (equivalent to 4 storeys) and the Peabody Estate (soon to be up to 12 storeys). Whilst we acknowledge that the state of the buildings is poor, it gives an opportunity for a comprehensive development. However, we consider that any application here would need, amongst other things, “preserve” and “enhance” the surrounding area’s character, and its massing and scale would have to be “well integrated into the surrounding development”.

It should specifically highlight

- conservation of historic part of the site (including frontage)
- tall buildings will be resisted in this location and heights should match those of the current building fronting St John's Hill up to the junction.

We have been requested the addition of this site allocation since 2013 in previous consultation³⁶. At the time, the response from planners was:

Whilst acknowledging that the TA centre is of a size (approx 0.4ha) that would warrant consideration of inclusion as a separate site within the SSAD it was never brought to the Council’s attention in the early stages of the plan preparation period. As there wouldn’t be any consultation on this potential new site there would be no opportunity for public comment and

³⁶ CJAG Response to consultation July 2013

therefore it is considered too late in the plan process to add a further site.

We note that this time, there will be a further opportunity to view and comment on the final draft version of the Local Plan later this year and therefore no reason for not adding this site.

We support comments from LavenderHillForMe community forum, especially:

Certain preferred approaches to movement, such as providing for pedestrian site permeability through to the adjacent Peabody development, may be a very desirable consideration at this stage, to ensure that ongoing development plans at both this site and the adjacent sites can be undertaken in a joined-up and holistic way.

14. Achieving Design Excellence

LP2 General Development Principles page 211

There is a fundamental problem with the listing a series of criteria as in Policy LP2, (which we will find also later with policy LP4). There is a lack of definition of the terms “unacceptable impact”, “unacceptable levels”, “visual intrusive”, “would not compromise” ... etc and therefore the decision will only lie on the planner's own consideration, or shall we say... taste.

For the purpose of illustration, below are some examples of existing application shows an easy way to circumvent a criterium:

- p.a. 2014/5149: While there would be alterations to the surrounding buildings, the impacts are not considered sufficient to justify the refusal of the scheme.
- p.a. 2018/3709: The development would result in some loss of daylight and sunlight to some existing windows within nearby residential properties, and in some cases, this would be to a significant degree. On balance, however, it is considered the impact of the development on the amenities of existing neighbours is commensurate with the site's urban location.
- p.a. 2018/3709: It is concluded that after careful consideration the proposed development is, on balance, in an acceptable degree of compliance with relevant planning policies and guidance
- p.a. 2014/5149: While there would be some harm to the area and listed buildings, on balance, it would be outweighed by the positive benefits of the scheme.
- p.a. 2017/5818: In terms of neighbour amenity, there would be some impact to neighbouring properties as a result of the development. However, given the

townscape context of substantial buildings within an urban location, the level of impact has been assessed as acceptable.

- p.a. 2014/7103: It is clear that there would be a notable impact on neighbouring properties as a result of the development. This would relate to loss of privacy, outlook and overbearance and daylight and sunlight. Whilst borderline, in each of the assessments, it was considered that on balance acceptable.
- Etc.

We are especially concerned by the lack of precise rules on the impact on adjoining properties. The terms "avoids unacceptable impacts" are a matter of opinion and we doubt that the planner will have the same perception that the resident overlooked by the development.

It should be unacceptable to approve proposals with BRE Daylight and Sunlight reports showing that a noticeable number of windows may fail to meet BRE guidelines and experience an alteration in excess of 40% daylight (VSC). Yet Wandsworth Council approves such schemes!

Official guidelines recommend a longer distance than the 15m proposed. For example, The London Supplementary Planning Guidance (SPG) (page 83) states:

"planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21 metres between facing homes."

Wandsworth Council should propose a minimum distance of 18-21 metres, in line with the London plan, and allow additional mitigations to prevent overlooking aspects of new build that could diminish the privacy rights of existing properties.

Suggested: "Any development should abide the minimum separation distances of 18-21 meters", as per the London Plan.

In responses to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we reiterate comments supported by the Wandsworth Society: "Wandsworth Society and Clapham Junction Action Group responded that Wandsworth need to use the London plan guidance as a minimum and they are encouraged to increase these standards as it will improve the wellbeing of the whole borough."³⁷. The answer from the Planners that "The degree of overlooking depends on the distance and the horizontal and vertical angles of view. [...] However, public spaces

³⁷ Page 50 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

and communal amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide" is inadequate.

LP3 General Development Principles page 213

We support the principal. However, Wandsworth Council should demonstrate within the policy how it intends to enforce the listed elements.

Former Fishmonger/Alchemist façade (p.a. 2015/2762) which was demolished against planning permission, was never rebuilt "brick by brick" as the then Planning chairman Cllr Sarah McDermott declared, but a retrospective application was granted to rebuild with modern masonry blocks. As pastiche goes...

In addition, we oppose Part Out: Council's decision are currently full of the wording "benefits outweigh harm" which is a private consideration.

E. Should be removed:

~~Development proposals involving substantial harm to (or total loss of significance of) designated heritage assets will be resisted unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss and has been clearly and convincingly demonstrated in accordance with national policy and guidance~~

LP4 Tall Buildings page 216

In the past, the policy was using the term "inappropriate" or "sensitive". We were told by Planners that "inappropriate" means only that any tall building would trigger then the list of criteria to assess the proposal.

It created a lot of ambiguity and as a developer put it³⁸: "tall buildings in this location are likely to be inappropriate. [...] It does not go as far as advising that the site would not be suitable for tall buildings"

In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we wanted "to see the current approach to tall buildings amended". The response was "Policy LP 4 (Tall Buildings) includes a reference to the historic environment and the cumulative impacts"³⁹. The amendment is welcome.

³⁸ P.A. 2014/7103

³⁹ Page 25 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

Therefore, we welcome the amendment on the current approach to tall buildings, especially the cumulative impact name in the policy.

B. Proposals for tall buildings may be appropriate in locations identified in Appendix 2 [Figures 2-10] as being 'Opportunities for tall building clusters and/or landmarks' and 'Opportunities for tall buildings within town centres and along strategic routes', where the development would not result in any adverse visual, functional, environmental and cumulative impacts,

However, in order to be effective, the criteria should not be subject to personal judgement (i.e. statements such as "adverse visual impact will be balanced by the benefits" should be resisted).

For the purpose of illustration, we quote the way the planning officer manager to circumvent all issues on a recent application using personal judgement and taste, in order to recommend the proposal (it was refused in Committee)⁴⁰:

- although it is larger than the surrounding buildings, its layout and it comprising a range of heights would ensure that it does not unduly dominate the locality. → Reason given for refusal at the PAC: refused on the grounds that the scale, site, massing and layout of the proposal would be an inappropriate and the proposed development would result in undue harm to the amenity of neighbouring occupiers
- the scale and massing of the proposed development is not considered to be unduly harmful to the surrounding area. → Reason given for refusal at the PAC: refused on the grounds that the scale, site, massing and layout of the proposal would be an inappropriate and the proposed development would result in undue harm to the amenity of neighbouring occupiers
- it has been demonstrated that the proposed development would not have an undue impact upon the local townscape. [demonstrated by? We don't need to know apparently!]
- the proposed building of up to 6-storeys would undoubtedly significantly change the local townscape [...] the proposed building of up to 6-storeys would undoubtedly significantly change the local townscape ...etc is translated in the criteria as: As identified under the Design heading of this report, the proposed development would enhance the local street scene [This is a personal judgement; otherwise how can we explain that both the PAC and the 39 objections all considered that it would be detrimental to the area]

Therefore, a review of the criteria is needed. For example:

⁴⁰ P.A. 2020/2560

The location of tall buildings should avoid substantial visual interruptions

What is the definition of substantial? If it is possible to write: "the proposed building of up to 6-storeys would undoubtedly significantly change the local townscape but it is not considered to generate substantial harm to the surrounding", then the criterium is ineffective.

It should clearly specify that schemes consisting of over-development, having a detrimental effect on the local environment and at risk of harming the neighbourhood will be refused.

Most importantly, the use of "should" means that it is not mandatory and therefore can be dismissed. The verb "must" would be perfectly appropriate, and it is actually used in the second part of criteria 5: "The 3D modelling must also incorporate buildings". We note that when redacting LP5 Residential Extensions and Alterations, planners did not use the same precautions and the wording is much more directive.

If all criteria can be circumvented "on balance" of the benefits that the scheme "could" generate, the list is ineffective and serve no purpose.

In addition to general comments above, all the verbs "should" must be replace by "must".

4.39 Recognising this, the Urban Design Study has developed a number of local definitions, which are based on an assumption that tall buildings in Wandsworth are those that are 8 storeys or taller; or are 50% higher than the prevailing height of the local context

We note that the definition has changed. In the current policy on Tall Building states⁴¹:

Tall buildings may also be appropriate in the Lombard Road/York Road Riverside Focal Point. Outside these areas the borough is largely characterised by low-to medium-rise housing and tall buildings are likely to be considered inappropriate.

In most of the borough, tall buildings, i.e. 5 storeys previously, were considered inappropriate. This is not the case anymore apparently. Therefore, we require explanation on the meaning of "local context". Does it mean that one tall building in the all vicinity will trigger the possibility for further similar buildings not being considered tall?

4.39 The definition is ambiguous and "local context" must be replaced or explained. We suggest "adjoining buildings" or "close vicinity".

⁴¹ Core Strategy, p107 (4.168)

4.45 There might however be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.

4.45 Without clear definition of "circumstances", this wording must be resisted, as it is ambiguous; obviously all applicants think that their proposal is acceptable!

Map 14.1 Tall Buildings page 221

We require explanation regarding the inclusion of the zone highlighted in blue on the image beside.

It includes:

- the Victorian Terrace Houses of Mossbury Road (which include house #22 Mossbury Road in the local assets list, one of the oldest houses in Battersea),
- Frontage on Lavender Hill which is described in this draft local plan as: "The character of the area is derived from its surviving Victorian and Edwardian townscape, as exemplified by the terraced shops along St John's Road, St John's Hill and Lavender Hill, which remain the centre's focus for retail."⁴²
- Eccles Road with Victorian Terrace houses, Battersea Library (listed building).

According to the map, all the locations above have opportunity for tall buildings. We require explanation for specific inclusion of the Battersea Central Library in the zone having opportunity for tall building, as shown with a specific encroachment on the map, south of Lavender Hill.

We can only assume that this is a mistake and therefore the map must be amended to remove the zones above.

Suggested map beside.



⁴² Draft Local point 6.8 page 112

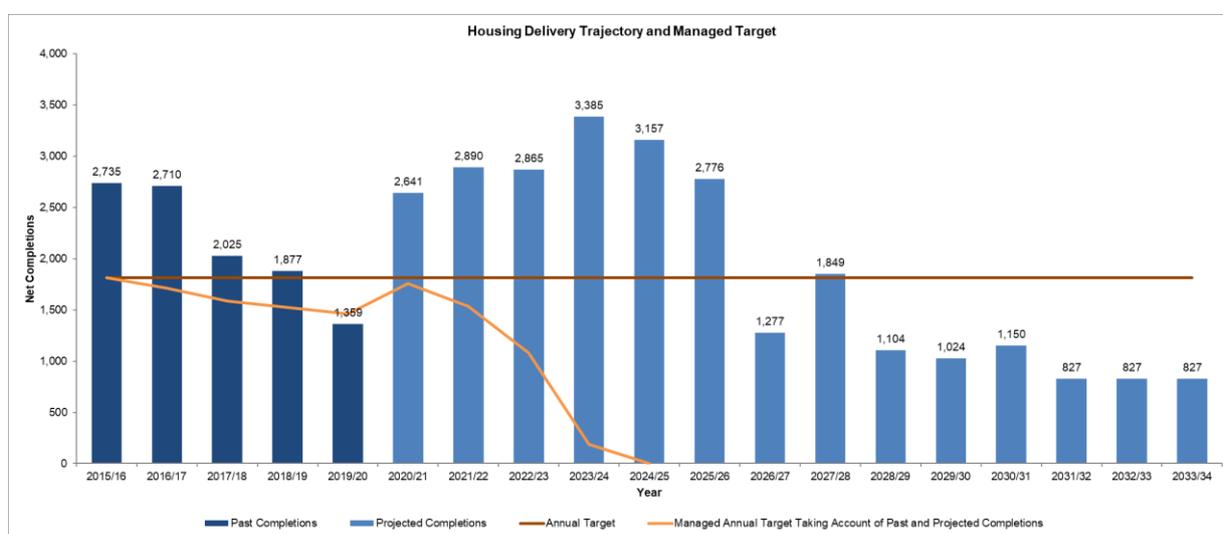
17. Providing Housing

17.2 page 276

Our ambition is to maintain this record and exceed the London Plan housing target

Why trying to maintain such “record”? And especially why exceed?

The Council's own Housing Delivery Trajectory and Managed Target⁴³ shows a reduction of housing delivery within the next 12 years. With Nine Elms mostly constructed and many other brownfield lands having been intensively developed over the last 15 years, the existing trend is not sustainable with the preservation and enhancement of green space.



The planners are aware of the challenge as the draft document says on par 17.9 “The Council also needs to take account of the need to ensure that sufficient land is available for other essential uses such as employment, education, health, retail and other community facilities”, however it does not reflect on the consequences for the housing target ambition.

An analysis of the figures provided by the planners⁴⁴ highlight the disappearance of brownfield sites. Nine Elms makes a fourth of the housing target quotas, and once delivered in the next 5 years, will have a neglectable impact on future delivery. Beside Nine Elms, the borough relies heavily on the redevelopment of two large estates: Alton estate in Roehampton and the Winstanley/York Regeneration estates in Clapham Junction.

⁴³ <https://www.wandsworth.gov.uk/authority-monitoring-report-amr>

⁴⁴ Table 17.3 Estimated housing capacity over the plan period

In addition, as shown previously in this analysis and the draft Local Plan itself, the conjunction of Brexit and the Covid crisis is set to have long term consequences on the population living in London. As reported by accountancy firm PwC⁴⁵, London's population is set to decline for the first time in more than 30 years.

17.2 Suggest removal of: ~~"Our ambition is to maintain this record and exceed the London Plan housing target by keeping levels of delivery as close as possible to those achieved in recent years."~~

17.5 Page 277

The affordable housing mix will mainly be focused on 1 and 2 bedroom dwellings, recognising the preferences of households on the Wandsworth's Housing Register.

The current Core Strategy says:

"It is crucial, as part of providing an overall balanced housing stock in Wandsworth, that the range of dwelling sizes available in the existing stock is maintained, particularly family housing with gardens. [...] The provision of affordable family housing is a strategic priority of the London Plan."⁴⁶

The accuracy of the statement "1 and 2 bedroom dwellings, recognising the preferences of households" as this is likely to be due to the difficulty for Wandsworth to provide bigger units under the affordable regime. The current strategy explains that "Rising house prices in the borough have made it increasingly difficult to deliver intermediate housing which met the Council's previous requirement for two thirds of intermediate housing to be available to households with gross household incomes of £38,000 or less."

The Covid crisis has also changed the perception of housing occupation and the development of working from home and flexible working use has highlighted the need for larger units.

17.5 The planners are not flexible enough in their forecast and therefore we suggest: "The affordable housing mix will seek to adapt to the changing demand and therefore will encourage flexibility in the size of dwellings"

LP25 Affordable Housing page 280

The Council will seek to secure the Mayor's strategic target of 50 per cent of all new homes to be affordable, having regard to the character and context of individual development proposals and to viability considerations. The threshold level of affordable housing based on the gross number of new homes to be provided, having had regard to the most up-to-date viability evidence, must equate to at least: 35% on individual sites

⁴⁵ PwC - January 2021 Economic Outlook paper

⁴⁶ Local Plan - Core Strategy (Adopted March 2016) p113

outside of the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB OA); 15% on individual sites within the VNEB OA;.

There is without doubt a lack of affordable accommodation available in Wandsworth.

In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we commented that “commented that greater affordable accommodation is required on all new developments.” However, planners are just duplicating targets from the London plan while trying to release constraints on social tenure⁴⁷.

In addition, all comments on “35% threshold is a minimum and the Council should push to provide a greater amount of affordable housing than this. Viability assessments should be made public to increase transparency. Celeste Giusti of GLA responded that the threshold approach of 35% or 50% on public land or where industrial capacity is lost. Mayor would have no objections to a policy seeking contributions from schemes of fewer than 10 dwellings.” are not addressed in the proposed Local Plan.

In a recent application⁴⁸, developers submitted an assessment showing:

13,500 Private Rented Sector (PRS) households in the local area, with the average studio rent in the area ranging from £1,440 - £ 1,650 pcm and for 1 beds £ 1,350 - 1,800 pcm. At the median household income of those households living in the PRS only 44% could afford a 1 bed PRS property.

We are aware of the Mayor's strategic target of 50 per cent of all new homes to be affordable. We know also that the NPPF 2018 widens the definition of affordable housing and therefore it is sensible to move the target up to send a signal to developers.

However, the policy should reflect more accurately the target of the different type of affordable housing. The NPPF⁴⁹ says in par. 62:

Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required

It includes the share of social housing, affordable rent (20% below market rent including service charges), affordable home ownership, shared ownership...etc. The current designation in the Local plan is too vague.

LP25 Affordable Housing – C - Must elaborate “affordable housing tenure split of 50% low-cost rent products and 50% intermediate products.”

⁴⁷ Page 36 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

⁴⁸ Hazel Court – p.a. 2020/2560

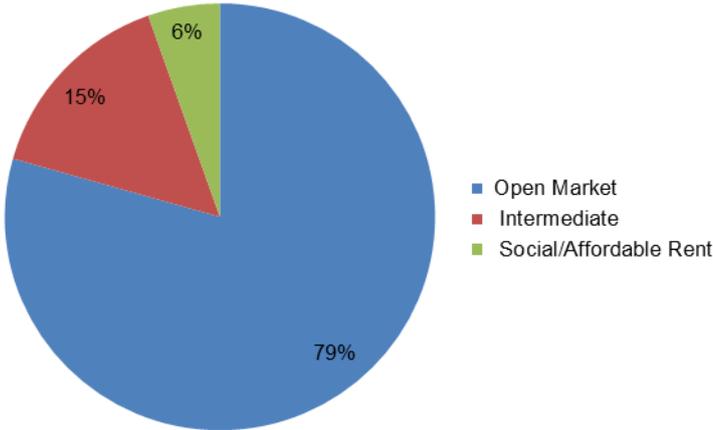
⁴⁹ National Planning Policy Framework February 2019

Although the Mayor 50% target can be justified, questions arise whether the target is viable, and therefore achievable, especially in a context where Wandsworth Council has failed to reach much lower targets in the past decade.

We note that Nine Elms continue to benefit for a much lower target of just 15%. Given the fact that a fourth of the provision of new housing is meant to come from this area, we don't understand how the Council can have any hope in achieving the Mayor's strategic target of 50% of all new homes to be affordable. To make matters even worse, the threshold level of affordable accommodation is only meant to reach 50% on public sector land and Industrial Sites.

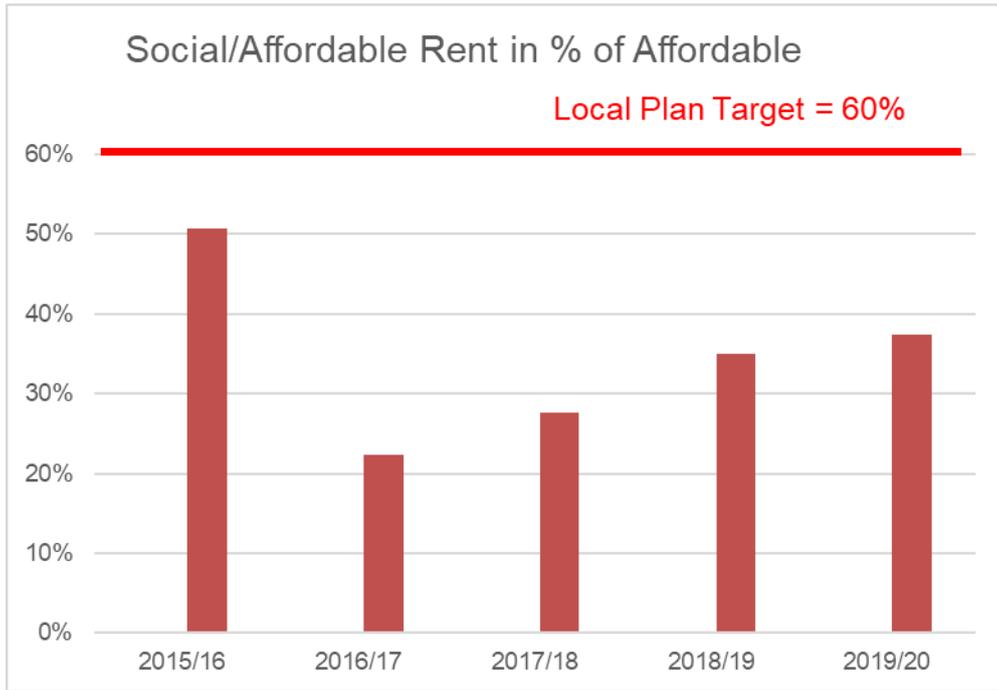
LP25 Affordable Housing – We suggest moving the target for NEVB to 35% and 50% for the rest of the borough.

Total net completions by tenure 2005/06 to 2019/20



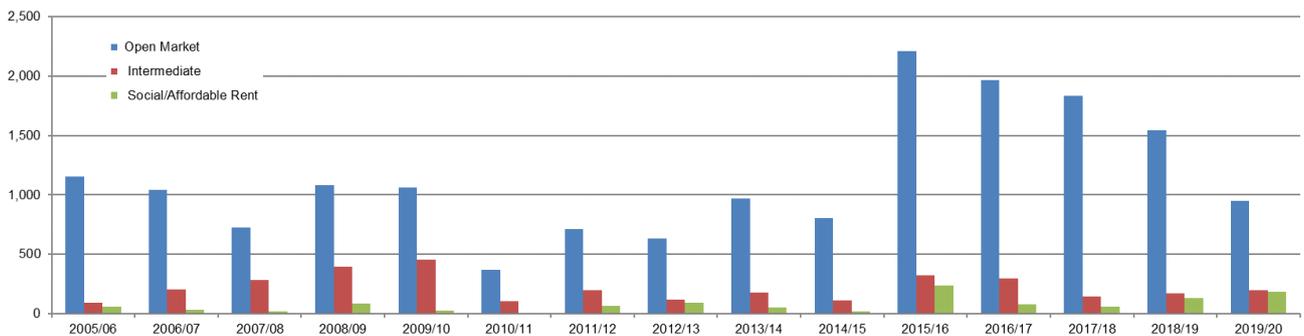
All figures in the latest Authority Monitoring Report (AMR)⁵⁰ show that not only Wandsworth borough is below achieving the current adopted Local Plan target of 33% on sites (Wandsworth Council has only produced 10% affordable housing during 2017/2018), but in the affordable component, they can't even get close to the 60% social/affordable rent / 40% intermediate tenure split.

⁵⁰ <https://www.wandsworth.gov.uk/authority-monitoring-report-amr>



While failing to meet the target, Wandsworth could choose to enforce more drastically the requirements. Instead, the planners recommend to simply lower down the target⁵¹:

17.23 For the reasons outlined above, the Council considers that an equal split of 50% low-cost rented housing and 50% intermediate housing is the best approach to improving housing options in the borough.



17.23 We object to the change of target for housing split due to the previous failure of fulfilling housing commitments.

We strongly reject the reasoning that by relaxing the targets, it would encourage a range of households.

⁵¹ 17.22 - Based on recent experience of the difficulties of achieving the adopted Local Plan affordable housing tenure split of 60% affordable rent and 40% intermediate products...

There is no sign in this Local Plan that Wandsworth will choose to divert from the current trend and unless this is added, the figures will only be seen as a component to be ignored.

In the past, the Council has heavily relied on viability assessments to exempt developers to comply with the affordable housing provision. It is worth noting what the government inspector concluded in the latest Local Plan examination for the borough of Croydon:

“Given that valuation is an art rather than a science, the presumptions inherent in the process mean that its apparent accuracy is sometimes misleading. Expert valuers frequently vary widely in their conclusions and margins of difference can be considerable. I do not attach greater significance to the Council’s Local Plan Viability Assessment than it can bear”

Similarly, we consider that viability assessments have been mostly used by developers to circumvent their planning obligations. We would like to quote the Battersea Society here⁵², which we find an accurate description of the process happening in Wandsworth:

“It appears to us that developers routinely pay a price for land which assumes the Council will find their need for height and density to provide viability persuasive. Thus, there is a vicious circle of over-priced land and over-tall and dense buildings.”

Other London boroughs have been more ambitious in their aim to fulfil the requirement. Hammersmith & Fulham Council’s Viability Study of 2016, prepared to support its recently adopted local plan, observes the following at paragraph 6.11:

“The results of our appraisals indicate that the adoption of a 50% affordable housing target is viable in some of the scenarios that we have tested.”

We fail to find similar testing in the Wandsworth Local Plan.

LP25 Amendments should include:

Information of all applicants that highest consideration will be given to the level of housing provision in respect to the Local Plan targets.

Developers are expected to provide the split of affordable housing required by the housing targets, except exceptional circumstances.

LP53 Parking, Servicing, and Car Free Development page 357

Car-free schemes are too often used by developers to avoid expensive developments and thus maximise profit to the expense of the existing area.

⁵² Response to Pre-Publication Regulation 18 Consultation Version of Wandsworth Local Plan
From: The Battersea Society Planning Committee, page 14

Less car-parking always mean more congested adjoining streets especially at night time and weekend when visitors come or rented cars need to park. In the past, the Council has waived the condition that no parking permits for residents will be provided, after planning approval was granted.

In the Clapham Junction area, it has been demonstrated also that, despite a magnificent PTAL, the congestion is a major issue and transports are over-stretched at some specific hours.

CJAG comment above is supported by The Wandsworth Society and The Battersea Society's responses to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018⁵³

We dispute the requirement for car-free and car-low developments. We suggest the following:

K. Car-free development will be ~~required~~ considered where:

L. Low Car development will be ~~required~~ considered where:

LP58 Tree Management and Landscaping

- consent for works to protected trees (TPOs and trees in Conservation Areas) will only be granted where;
- a. proposed works of pruning are in accordance with good arboricultural practice, or
- b. proposals for felling are properly justified through a detailed arboricultural and/or structural engineer's report;
- and
- c. adequate replacement planting is proposed.

A 2018 planning application⁵⁴ made a mockery of the Tree Protected Orders issued by Wandsworth Council. The Council's tree service wrote: "The loss of the majority of the TPO London planes (16 of 21) would result in a substantial loss of public amenity." It was ignored by the planners and justification given such as:

"Whilst it is regrettable that the proposal would result in a loss of trees including trees covered by a TPO, an appropriate landscaping scheme for the site as well as adequate tree planting will be secured by conditions and the S106."

In the Local Engagement event organised by the Council, opinions were largely shared such as:

⁵³ Page 110 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018
⁵⁴ p.a. 2017/0580

1. There should be a real tree strategy so the value of trees is properly assessed, rather than allowing mature trees to be replaced with token saplings (i.e., a mature tree could be worth 5 smaller trees).
2. There should be a presumption that no tree should be cut down and it should be up to the developers to challenge the decision and replace with the same value if necessary.
3. The plan should favour refurbishment instead of knocking down and rebuilding (even if the latter is cheaper).
4. A preference for environmental compensation or larger new developments to be on site, or failing that as close by as possible – there was good support for creation of 'pocket parks' and small local green spaces
5. 'Offset' of environmental impact – the option paying money for something to be done elsewhere, far away – must be avoided as this is seen as too easy a get out for developers. There were fears that some of the measures offered by developers were just 'greenwash', and weren't necessarily followed through with.
6. Concerns about the tendency to accept that "wider benefits" outweigh harm
7. Construction on local authority land – where the Council has more direct control – should be seen as an example for all other developments

We fail to see those concerns expressed in the Local plan. For example, LP58 says "adequate replacement planting is proposed" or "require, where practicable, an appropriate replacement" which fall short of supporting any strong views expressed during the Local Engagement event.

Current event in York Gardens where developers (including the Council) are adamant to fell a 100-years-old tree for the purpose of avoiding the redirection of electric cables necessary to their development is the latest illustration of the issue.

Conservation Area?

There is no section explaining how the Council intends to preserve and enhance the conservation areas.

See also our previous comment on Site Allocations / CJ1 ASDA, LIDL and Boots sites, Falcon Lane, SW11.

In our response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018 we commented that "conservation areas should

be mentioned at least." Response was that The Wandsworth Policies Map will be available online and in print (??)⁵⁵. We note its absence.

In addition, we wanted the definition of conservation areas to be strengthened. We do not accept the response from the Planners that "changes to conservation areas can be made outside of a Local Plan process" and therefore that it can be totally absent.⁵⁶

A section should be added. LP3 is not considered appropriate to justify the absence of section on conservation area.

Conclusion

We regret that the Council did not offer more help in the consultation process, especially with the tightest time frame and a lack of commitment to engage directly when requested by the community.

'Very thorough consultation with written submission requested; then no response for 21 months; eventually a 153-page Consultation Statement document to analyse, followed 2 months later by more than 500 pages for the draft local plan to comment within...8 weeks) ...' This ping-pong game that the Council is promoting with written statements exclusively and no direct communication and dialogue offer, is pulling enormous strain to volunteers that are submerged by requests to comment with the absence of any proper interaction.

Once again, the Inspector examination process could be the only opportunity to confront arguments and get direct responses. A proper community engagement should expect better from the Council.

⁵⁵ Page 13 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018

⁵⁶ Page 31 of the Representation in response to consultation on Wandsworth Local Plan Full Review - Issues Document – December 2018