

Response to Regulation 19 Publication Version of Wandsworth Local Plan

From: The Battersea Society Planning Committee

Introduction

The Battersea Society submitted detailed comments on the Regulation 18 draft Local Plan dated November 2020 and issued for consultation in January 2021. We are disappointed that few of our comments were accepted, and that the substance of the Plan remains largely unchanged. We believe that many features of the Plan fail to meet one or more of the four criteria of soundness set out in the latest revision of the National Planning Policy Framework (NPPF).

In our response below we have had to reiterate many of the concerns we expressed a year ago. We recognise that as the Plan was being prepared, significant changes and uncertainties were introduced into the policy environment, following the White Paper *Planning for the Future*, revisions to the NPPF, publication of the National Design Guide (NDG) and the National Model Design Code (NMDC), and publication of the London Plan. Additionally there were the difficulties of the pandemic.

Notwithstanding this problematic context, it should have been possible to produce a Plan with overall integrity – something this document lacks. It reads as three separate parts – Strategic Context; Spatial Strategy and Area Strategies. Too often policies are poorly related and appear as discrete topics – for example urban design, housing, transport, green and blue infrastructure and so forth. The Plan therefore fails to fully meet the test of soundness. Nor does it meet the NPPF requirement that it should contain policies that are clearly written and unambiguous, demonstrate how they address relevant economic, social and environmental objectives, and avoid unnecessary duplication.

The Plan is over-long, inconsistent and incoherent, and does not represent a proper basis on which to determine policies and strategies for the next fifteen years.

Its excessive length is the result

- of needless repetition (for example, paragraphs 20.13-20.16 on the Healthy Streets approach, or 21.13 and 21.25 on Metropolitan Open Land);
- long-winded and convoluted statements (such as the paragraphs on building heights at the end of each site allocation);
- needless explanations of points not directly related to the Plan (such as paragraphs 16.6-16.7 on the links between the environment, health and well-being; 19.52 on meanwhile uses; or 20.11 and 20.14 on the benefits of walking and cycling); and
- otiose and repeated rhetoric about Wandsworth's success such as its being as 'one of the most desirable and dynamic places to live and work in London' (paragraphs 2.17, 2.20 and 20.10). The examples given above could be multiplied across the Plan.

The Plan is inconsistent and incoherent because:

- There is no clear connection between the strategies, visions and objectives in Chapters 2 and 3 – themselves internally inconsistent – and the policies set out in the rest of the Plan. Many examples are given in section comments below.
- There are inconsistencies in the inclusion or not of site allocations that featured in previous plans, and where planning permission has been granted, or building work is well underway, in some cases nearing completion. In a number of cases permission has been granted in conflict with the policies in this plan.
- There remain many factual mistakes that were pointed out in responses to the previous draft.
- There are too many references in the future tense to things that have already happened (for example, the opening of the Northern Line Extension, or the Embassy Quarter Heating Network).
- The scattering of maps throughout the Plan, the lack of any list of them, and their form of presentation, means that there is no simple way to find out what is mapped, or where. Those maps that cover the whole borough are often oddly placed (it is odd, for example, that the first map (2.1) should be about public transport, while Chapter 20 lacks any map on that issue).

- There are many references to the London Plan, but they are made inconsistently. In some cases policies in this Plan (LP1 and LP 19 for example) set London Plan policies as a specific requirement; in others (LP42, for example) London Plan policies are mentioned only in subsequent explanatory paragraphs; in others (LP23 for example), while London Plan policies are not referred to in the policy, they are explicitly modified in subsequent paragraphs; and in yet others (LP17 and LP31, for example), policies here are incompatible or inconsistent with the London Plan, though this is not acknowledged. These differences make it almost impossible for those using the Plan to judge precisely what policies are relevant to any particular kind of development.
- The framing of the paragraphs that follow each of the Plan policies leads to incoherent justification for the policy. There is no consistent approach. While they mostly provide background or context for the policy in question, or point to relationships with other policies, in other cases they add to or modify that policy (for example 16.66 on Planning Obligations relating to water and drainage infrastructure; 17.12 on types of affordable housing; 18.67 on open space provision; or 20.30 on car club parking). This makes it problematic for the Plan's users to see precisely what the policy is.

We exemplify all these problems in our comments under the relevant sections, with a focus on the implications for Battersea.

Chapter 2. Strategic Context, Vision and Objectives

As we pointed out in our comments on the previous draft, this chapter gives not one but seven different visions, numerous strategies and 13 overlapping but often inconsistent sets of objectives. How any of them relate to each other is wholly unclear since there are overlaps but also significant differences between them, as well as gaps. Hence it is almost impossible for the reader to make any sense of what the overall vision, or the core strategies, might be; or which among the competing sets of objectives are the ones to which reference might be made in the rest of the Plan. The status and purpose of the numerous and varying lists of strategies and objective are undermined when we find in Chapter 3 a completely different set of 14 principles against which we are told (3.26) that development proposals will be assessed. This chapter therefore fails to provide, as required under the test of soundness, “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”. This makes it impossible to judge, as the NPPF requires, whether the policies that follow in succeeding chapters – or which of them – fit the overall strategy.

The problems are exacerbated by the huge amount of repetition: many topics are dealt with in several different places in the 109 paragraphs, with different - often inconsistent - objectives and targets. Housing, for example, is covered in paragraphs 2.2 to 2.9, 2.41 to 2.43, and 2.80 to 2.83, with many additional mentions, saying different but related things (though housing hardly features in the overall lists of key goals and objectives; we have to wait until near the end - in policy SDS1 - for a specific housing target). Moreover, there is virtually no explicit cross-referencing to these different strategies and objectives in the remaining chapters of this over-long Plan. Such cross-referencing might have avoided some of the inconsistencies that litter the Plan as a whole.

Finally, we note that despite the several references throughout the Plan to the required ‘Policies Map’ illustrating geographically the application of policies that it contains - including, for example, archaeological priority areas (LP3); core, secondary and local frontages (LP42); areas of open space (LP53); and areas such as SSSIs (21.28) - no such map is provided in the Plan.

We support the claims above by reference to the following paragraphs.

2.15. The vacancy figures for the town centres given here are now grossly out-of-date following the pandemic.

2.26. The discussion of vehicle ownership says nothing about traffic volumes, or about [evidence](#) of the increasing levels of congestion seen in the past two years, up by a third in Wandsworth.

Map 2.1 Public Transport Network. The placing of this map here – the only map in a chapter that covers a host of issues – rather than in Chapter 20 on sustainable transport is difficult to understand. Moreover, it has no reference to the bus network, and fails even to indicate where PTAL levels and access to buses in particular are low (an issue mentioned in paragraph 2.24).

2.29. This paragraph states that the Plan contains the Strategic Vision and Objectives for Wandsworth. But there is no clear statement of the Vision, or how it relates to the six Corporate Plan objectives (2.31), the five Inclusive Growth objectives (2.34), and/or the Wandsworth Environment and Sustainability Strategy (2.38). Why do we have to wait until the lists of objectives on pages 22-24 for any reference (and even then implicit rather than explicit) to the three key aspects of sustainable development - economic, social and environmental - that is at the heart of the requirements set by the NPPF?

2.33-34. Does what is referred to here as the Council's *Inclusive Growth Programme*, relate in fact to the *Smart Growth* recovery plan launched in June 2020? And how do the five objectives for the programme relate to the Corporate Plan objectives (2.31)? There are similarities, but also differences. Which are we to regard as authoritative?

2.37-38. The vision for the Wandsworth Environment and Sustainability Strategy (WESS) says nothing about how to build a sustainable social and economic future for the borough. And the aim to be the greenest *Council* is beside the point; the Plan must be about the *borough*.

2.42. It is unclear how the Housing and Homelessness Strategy and its five themes relate to the strategies and objectives of the Corporate Plan (2.31), the Inclusive Growth Programme (2.34), the WESS (2.38), the various health, care, well-being and estates strategies and plans (2.47ff), or the Spatial Vision and Strategy (2.57, with 18 objectives in the text box on pages 20-21 and further sets of social and economic objectives on pages 23-24). It is similarly unclear how they relate to the subsequent statements about housing in this Chapter: in paragraphs 2.80-2.83, Section B of the Spatial Development Strategy on pages 33-34, the statements in 2.104 to 2.109; or to the strategies and ten policies set out Chapter 17 (pages 345-361).

2.47. The Joint Health and Well-Being Strategy seeks to reduce 'the differences in health and life expectancy between the wealthiest and most deprived people'. But this far-reaching objective receives no mention at all in the objectives for the Corporate Plan (2.31) or Smart Growth (2.34). Nor, even more disturbingly, is it mentioned in the social objectives on page 23, or in Chapter 16 on providing for Wandsworth's people.

2.57. It is not clear whether the succinct vision presented here is intended to be the overall vision that is promised in paragraph 2.1; nor why we have to read through 56 paragraphs to get to it. How does it relate to the nine overlapping but inconsistent strategies and sets of objectives specified earlier in this chapter, or even to the objectives for 2038 and the environmental, social and economic objectives that follow?

2.58. This paragraph is a disorganised mess: a mixture of aspirations and expressions of the need to address unrelated challenges, most simply repeated from elsewhere in the Chapter. Why the ones set out here are chosen for repetition, and not others, is wholly unclear. The statement in the middle of the paragraph that the Council will secure 'a greater choice in the type, size and tenure of housing, particularly for families' is incompatible with the targets for the mix of housing set out in policy LP24, which focuses overwhelmingly on 1 and 2-bedroom houses. But why is this statement separated by discussion of totally unrelated issues from the statement 8 lines further on about bridging the gap between housing supply and demand, and diversifying the housing offer? We note also that the references to housing demand are not accompanied by any reference to the separate issue of housing need, as discussed in the recent House of Lords report on Meeting Housing Demand¹.

Goals (?) for 2038

It is not clear how this list of goals or targets relates to the numerous lists of objectives, priorities and targets set out in the preceding paragraphs; nor how it relates to the immediately-following list of environmental, social and economic objectives; nor how it relates to the spatial strategies in 2.59 and following paras. The status and purpose of these varying lists of strategies and objectives is made even less clear when we find in Chapter 3 a completely different set of 14 principles against which we are told (3.26) that development proposals will be assessed. Even within the lists of objectives shown here there are overlaps, but also significant gaps and differences, including, but not limited to the following.

¹ HOUSE OF LORDS Built Environment Committee. 1st Report of Session 2021–22. HL Paper 132. *Meeting housing demand*

a. Despite the statements in 2.43 about housing and targets for affordable housing, and 2.58 about greater choice in housing, about bridging the gap between supply and demand, there is no specific target relating to housing in this list. For any such target we have to wait until the policies set out in SDS1. So in this crucial aspect, the two lists are incomplete.

b. Digital connectivity is mentioned in three of the targets in this list; but it does not feature in any of the social or economic objectives

c. There is no specific target in this list relating to arts and cultural provision; nor to transport services and infrastructure

Goal 1. It is wholly unclear how the three sentences in this target are related to each other, or to the other 17 targets. Is it a restatement of the vision set out in para 2.57?

Goal 3. This objective on social integration should surely be related to the target of reducing inequalities through regeneration in goal 7.

Goal 5. It is disappointing that this goal relating to Wandsworth town centre and the delta is not matched by a similar statement relating to Clapham Junction, especially since this revised version of the Plan commits belatedly to the development of a Master Plan for a core part of the Junction.

Goal 6. It is impossible to see how anyone will know whether this extremely complex target has been met.

Goal 10. None of what is said here about digital connectivity is reflected in the economic objectives set out in the immediately-following list.

Goal 11. What is said here about the protection of industrial land does not take account of the Secretary of State's removal from the London Plan of the 'no-net-loss' of industrial land policy. But the objective should surely be related a) to Objective 4 and the creation of mixed-use quarters, particular those specifically mentioned in both targets; and b) to Objective 8 and the provision of employment opportunities.

Goal 13. The statement that Wandsworth will be the best place to live in inner London by 2038 is meaningless unless there is a clear statement as to how that goal will be measured. And it seems very odd not to include the parks and commons among the public spaces and public realm that will be attractive and desirable.

Goal 14. This objective is inappropriate without mention of the borough's 46 conservation areas among its heritage assets.

Goal 16. The inclusion of the NLE in a list of targets for 2038 is inappropriate when it has already been opened.

Goal 17. The claim that Wandsworth will be the greenest inner London borough is meaningless unless there is a clear statement as to how it will be measured. Neither in this Plan nor in the WESS is there any such statement.

Goal 18. This goal is mainly about infrastructure, but with a final sentence that is entirely unrelated: "All our residents will enjoy a strong sense of community and inclusiveness". It is therefore incoherent.

Social Objectives

Objective 1. It is not clear how this housing objective relates to the five strategic themes set out as the basis for the housing strategy in 2.42; nor how it meets the NPPF requirement for strategies to ensure sufficient provision of housing, including affordable housing.

Objective 4. We cannot understand the statement implying that placemaking and area strategies will facilitate linked trips (whatever that might mean); still less the implication that this will be the key outcome of those strategies.

Spatial Strategy

2.59-102. The spatial strategy outlined in these paragraphs is developed further in Chapter 3. But no attempt is made either here or in that Chapter to relate the themes in this strategy to the objectives for 2038 or to the environmental, social and economic objectives set out beforehand. Moreover, while twelve of the fourteen principles and themes which form the basis of the Placemaking and Area Strategies in Chapter 3 are discussed here, two – infrastructure and resilience; and nature, climate and biodiversity - are not; and others are differently titled. Again, there is lack of coherence and consistency as to the overall strategy.

2.71. The statement here that the “LIP includes targets for traffic reduction and supporting objectives under Outcome 3 of the MTS” makes it difficult to understand why none of them are mentioned in the preceding lists of goals and objectives.

2.73. The text fails to recognise that the Northern Line Extension has already been opened, and that Crossrail 2 has been put on long-term hold by the Government.

2.76-77. This section on Design and Built Form fails to take account of – or even to reference - the NPPF's requirements for the development of design codes.

2.82. The statement here about ensuring that “the dwelling stock supports the creation of settled and blended communities, and that the borough remains an attractive place for families” is incompatible with the overwhelming focus on the provision of studios, one-bedroom and two-bedroom units set out in Chapter 17.

2.84. The term ‘responsive development’ is not defined either here or elsewhere in the Plan, despite its being identified as a key theme or principle in Chapter 3. The statement here about the existence of masterplans and strategic significant developments does not apply to Clapham Junction.

2.87. The implication in the final sentence, that redevelopment should wait until vacant units have been filled, is incompatible with the widely-evidenced need for development in several parts of the borough, notably Clapham Junction, with its designation as a nascent Opportunity Area in the London Plan.

2.90. We are puzzled by the reference here to the Diamond Jubilee Bridge (the very name of which has been overtaken by events). Recent Council documents suggest that there is *Currently limited prospect of pedestrian bridge to link riverside with Imperial Wharf given current TfL finances and DfT's priorities.*²

2.103. The heading Spatial Development Strategy adds to the confusion which riddles this Chapter. It is the second heading relating to Spatial Strategy (see the heading before 2.59). What is intended to be the relationship between the two sections is wholly unclear.

SDS1 Spatial Development Strategy 2023 – 2038

The purpose of this policy is wholly unclear. It is certainly not a comprehensive or coherent spatial development strategy. Its coverage is confined to housing and housing capacity, with some generic references to economic and employment issues and to waste management. It fails even to mention – still less to cover - many of the principles and themes outlined in paragraphs 2.59-102 which form the basis of the Placemaking and Area Strategies set out in Chapter 3. Nor does it say anything about crucial issues such as travel and transport; sustainability; green and blue infrastructure including open spaces; quality and design excellence; or climate change. Why housing capacity – which says nothing about housing need or affordable housing – is dealt with here rather than in Chapter 17 is not clear; nor is it clear why housing for travellers is highlighted, but not any of the other policies set out in that Chapter. In short, there is no clarity as to how the policies highlighted here relate to the policies set in the subsequent relevant chapters, or why they are set out here.

We note further that while the policy seeks ‘the delivery of a net *increase* in industrial floorspace’ this is not supported by policies elsewhere in the Plan, including the area strategies and Policy LP43, the latter of which seeks merely to protect and retain existing industrial land.

² *Progress Report* presented to Strategic Planning and Transportation Overview and Scrutiny Committee. Paper 21-315, November 2021.

2.104. It is confusing to say the least that this and the succeeding paragraphs on housing are separated from the earlier discussions of housing strategies and objectives in 2.31, 2.34, 2.38, 2.42, 2.47, 2.57, the 18 objectives in the text box on pages 20-21, the social and economic objectives on pages 23-24, and the statements about housing in 2.80-2.83.

Chapter 3. Placemaking – Area Strategies

We acknowledge improvements in the presentation of the Placemaking and Area strategies as compared with the previous draft Plan. Nevertheless, the fourteen themes or principles on which the area strategies are said to be based are still overlapping – transport, development, and housing, for example, appear twice under different headings – and key terms – such as “responsive development” – are left unexplained and undefined. This is made worse because there is no explicit cross-reference to the discussion of the subset of twelve of the principles set out under the heading of Spatial Strategy in Chapter 2, paragraphs 2.59-102. And we note at this stage that there is no attempt to link the policies and objectives for each of the nine area strategies set out in Chapters 4-13 to the fourteen themes and principles set out in this Chapter. Hence it is impossible to judge whether the policies in those area strategies are in line with the Council’s overall Placemaking strategy and objectives; and they do not meet the test of soundness.

In this and the succeeding chapters outlining area strategies, there is no reference to many of the elements required for area assessments set out in the London Plan’s Policy D1 A, including the categories of demographic and socio-economic data specified in D1 A1; housing types and tenure (A2); air quality and noise levels (A5) and topography and hydrology (A8). Indeed, there is no evidence that the kind of area assessments required by Policy D1 A have been carried out.

3.4. We do not accept the claim (repeated at 3.20) that the process of developing the area strategies ‘has been informed by also been informed by community engagement to ensure that the classification reflects those ‘Places’ recognised by local people’. We are not aware of any such engagement beyond a consultation in 2020 on an Urban Design Study undertaken by Arup.

3.7. We presume that the reference to the Policies Map for each area strategy is intended to refer to what are in each of the area strategies termed ‘Spatial Area Maps’. We note that these maps do not include information of the kind indicated in other parts of the Plan which refer to the Policies Map (see our earlier comment on Chapter 2). The qualification that the indicative areas on the Policies Map (sic) for each area strategy should be understood in general terms rather than defining precise boundaries is important, especially in relation to Clapham Junction, with its oddly-defined boundaries for the town centre, and then the much larger area indicated for the nascent Opportunity Area. However, the statement is in tension with the first sentence of 3.21: “The boundaries for the Area Strategies have been drawn to ensure that these areas of planning focus are functionally and visually integrated”.

We note also that the ‘spatial strategy area linkages’ shown on Map 2.1 Key Diagram, which seem to show linkages between, for example, Clapham Junction and Nine Elms, are nowhere explained or even referenced in the rest of the Plan. If the linkages exist, or are intended to do so, they must be explained.

Table 3.1. The fourteen themes and principles set out here seem to relate to issues discussed in Chapter 2 paragraphs 2.59-102; but it is unfortunate that this link is nowhere made explicit, and in some cases (‘built identity’ ‘economic development’) they are expressed differently. And as we noted in our comments on Chapter 2, there appears to be no relationship at all with the eighteen elements of the Vision for 2038 (text box following para 2.58) or the then following list of 25 environmental, social and economic objectives. Despite the prominence given to several issues in those lists, there’s nothing here, for example, about distinctive neighbourhoods, or about social integration, or reducing barriers and social inequalities, or about public services and their location, or about employment and the need for affordable and flexible employment spaces. There are many other examples.

Even more worryingly, in the area strategies in Chapters 5-12 which follow, we find that many of the key principles set out here are not referenced at all.

3.26. The statement that proposals that do not meet the fourteen principles (themes?) will not be supported raises the question of why the assessment of proposals will not include reference to the significantly different

list of 25 environmental, social and economic objectives set out as part of the spatial vision in Chapter 2. If not, what is the intended status of those objectives?

3.28. This largely repeats what's already been said (paragraph 3.12; Policy PM1 B and C; and paragraph 3.27).

Chapter 5. Area Strategy for Nine Elms

We believe that several aspects of this Strategy - including travel, transport and permeability; the balance between density and liveability; and the provision of affordable housing – do not meet the needs of the population of Nine Elms and its neighbouring areas, which will grow rapidly during the currency of the Plan. Nor does it take proper account of some recent developments within the area.

5.6. It is curious to note in a Plan that will come into force in 2023 that the Embassy Quarter Heating Network (EQHN) will start to provide low carbon heating to new developments by 2021.

5.8. The statement that Apple are expected to move into Battersea Power Station in 2021 has been overtaken by events. The move is now expected in 2022, before the Plan comes into force.

5.9 and 5.11. These paragraphs fail fully to acknowledge Policy E5 in the London Plan which requires the Council to explore opportunities to intensify and make more efficient use of land in Strategic Industrial Locations (SILs). They also fail to recognise that the Queenstown Road Battersea SIL includes Parkfield Industrial Estate. Although it lies outside the Opportunity Area, we believe that the estate, which is located between railway lines with arches, and has highly constrained access, merits inclusion either here or in Chapter 13 as a site allocation, with specific guidance about suitable industrial activity in the area.

5.13. The statement that the PTAL rating for the area will improve following the opening of the Northern Line extension should surely be in the past tense; and a revised PTAL rating should be provided. On the other hand, it is unsatisfactory that there is no reference to bus routes through Nine Elms, the importance of Vauxhall Bus Station as an entry point, or to any concern about capacity as development is completed. There is only one bus route (344) which runs from Vauxhall along the whole length of Battersea Park Road, and no direct route at all to the York Road area. Moreover, while the increase in provision for cyclists mentioned here is welcome, it is unsatisfactory that there is no parallel specification of better provision for pedestrians. Indeed, there is no recognition of concerns that in many parts of the area, including the linear park, pedestrians and cyclists are likely to come increasingly into conflict with each other.

5.17. We have strong reservations about these placemaking scores, which we do not believe reflect those of the increasing number of residents or those working/using facilities in Nine Elms. The area has changed so much since the Placemaking exercise was undertaken, and the methodology may not be suitable for a rapidly developing and populating OA such as this.

5.19. It is unsatisfactory that the seven elements in the vision make no mention of traffic management or of public transport connectivity, despite these being the first of the Plan's Placemaking principles.

Map 5.1 Creative Clusters We are puzzled by the purpose of this map, for which there is no supporting text and which has no equivalent in any of the other area strategies. The categorisation of some sites – including the temporary Flower Market and Arch 42 - as 'cultural uses' overstates the provision for creative and cultural uses.

Policy PM3 Nine Elms

Placemaking. There are no policies here relating to two of the placemaking principles: traffic management; and built resilience including digital connectivity

Placemaking 4a. The requirement that developments should protect and enhance views of Battersea Power Station has, from any viewpoints other than the north, not been respected in recent consented schemes including those at the former gasworks site and at Palmerston Court. For most of the residents of Battersea the Power Station and its chimneys are becoming increasingly invisible, since measures to ensure visibility from the north have not been matched by similar measures to east, west and south.

Inclusive Growth 1. It is unsatisfactory that nothing is said here about the principle of sustainable housing, or its reference to the environmental, social and economic objectives set out in Chapter 2, including crucial matters such the forms of housing tenure, or affordable housing.

Inclusive Growth 2. The circular reference here to developments on estates that must be ‘subject to the policies of the Local Plan’ makes no sense.

Inclusive Growth 6 and 7. These policies fail fully to meet the commitment in Policy SDS1 E3 that the Council will seek a net increase in the provision of industrial floor space. The same can be said of the suggestions of mixed development in the following site allocations, some of which, such as the Kirtling Street Cluster and NE2, could result in a significant net loss of floor space.

Inclusive Growth 11. While we welcome this policy, we note that despite the reference to LP49, there is no mention of urban logistics hubs in Chapter 20 on sustainable as a more general objective for wider areas of the borough, or emphasised as something which will be actively pursued and required for development in local employments area.

People First. There are no policies here relating to the people first principles of accessible day-to-day facilities; or lifestyle choices..

People First 6. This policy fails adequately to meet the principle of promoting ease of movement and active travel across the area, especially throughout the disconnected sections of the BDTQ. There should be a requirement to take forward the suggested feasibility studies set out in the BDTQ Economic Appraisal and Design Framework (p 37) to provide direct links through railway arches and, where appropriate, over the rail lines. The delays and uncertainties (not acknowledged here) about the timescale for the scheme to make Nine Elms Lane and Battersea Park Road more people-friendly are unacceptable. So too is the failure to mention here (or anywhere in this chapter) the proposals to modify Ponton Road set out in the Infrastructure Delivery Plan (IDP).

People First 7, 8 and 10. There is a need to improve accessibility to Battersea Park and Queenstown Road Stations not just externally but also within the stations themselves. The delays and uncertainties about these schemes (again not acknowledged here but in the IDP) are unacceptable.

Kirtling Street Cluster.

- 5.27 See our comment about mixed use development and the potential loss of industrial land under Inclusive Growth policies 6 and 7.
- 5.27 and 5.36. The references in 5.27 to residential use and in 5.36 to developments above the waste transfer station might suggest that housing might be built in that location. We have grave doubts as to whether that would be acceptable.
- 5.31. It is unacceptable that the proposals for modifying the junctions with Nine Elms Lane focus almost wholly on the needs of commercial vehicles. The reference to Kirtling Street should properly be to Pump House Lane.
- 5.37. It is not clear why the policies on movement in paragraph 5.37 do not include the requirements relating to public transport on Nine Elms Lane that are set in other site allocations (see for example the requirements for site allocation NE2, paragraph 5.47).

NE2 41-49 Nine Elms Lane, and 49-59 Battersea Park Road.

- 5.43. See our comment about mixed use development and the potential loss of industrial land under Inclusive Growth policies 6 and 7.
- 5.43. The proposed requirement for a boulevard pleasant for all users and providing links further north has not been consolidated with the proposals for junction improvements in 5.31. Nor is it compatible with what is said at paragraph 5.49.
- 5.53. This paragraph is confused. The reference to the north-east of the site should presumably be to the north-west; and the reference to the Park Side neighbourhood should be to the Nine Elms Park development. We do not understand the reference to ‘the Thessaly area to the west and to the Thessaly neighbourhood’.

NE4 Metropolitan Police Warehouse Garage, Ponton Road

- This site has a long history as a site allocation. See our comments on delivery at paragraph 22.13.
- 5.57 and 5.58. See our comment about mixed use development and the potential loss of industrial land under Inclusive Growth policies 6 and 7.

Battersea Design and Technology Quarter

- 5.64. Development of a Masterplan must not be left to landowners and developers, but should involve full community engagement in line with the requirements of the NPPF and NMDC.
- 5.72. The proposal to 'reduce potential conflict between vehicles, pedestrians and cyclists at the junction with Queenstown Road' is wholly unclear, since there is no junction from the Silverthorne Road site direct to Queenstown Road.
- 5.74. The reference to the NLE station 'currently expected to open in Autumn 2021' is otiose.
- 5.77. The statement that Havelock Terrace is opposite the NLE station at Battersea Power Station is false. Rather, it is opposite the Dogs Home, more than 200 metres from the current station entrance, and 100 metres from any future western entrance.

NE12 New Covent Garden Market

- 5.92. The proposed active travel link to Ponton Road can be achieved only if the proposed cycle (and pedestrian?) route in NE4 (paragraph 5.59) is provided. And the link to Ascalon Street can be achieved only if the links in NE2 (paragraph 5.48) as well as NE4 are provided.
- 5.95. See our comments on paragraph 5.53. In order to avoid confusion, the same language should be used in both paragraphs.
- 5.97. See our comments on paragraph 5.43.
- 5.125. The reference to 'strong east-west pedestrian and cycle connections with the wider Nine Elms area to the north' is at best confusing.

NE13 Battersea Park Road (between Stewarts Road and Thessaly Road)

The inclusion of this site is very difficult to understand. Very little is said about it, and it is already heavily built up, mainly with social housing owned by the Council. Further justification is needed for identifying this area as a potential future development site, given its current settled residential character and the listed pub building.

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

While we welcome the new commitment to develop a masterplan for a core part of the area, there are several aspects of the strategy that we believe are unsound.

- There is no discussion of whether or how the vision or the strategy might be delivered during the Plan period.
- Some of what is said about the area is simply wrong, mistaken, inconsistent or confusing
- There is no reference to the town centre's designation in the London Plan as a centre of regional importance for the night-time economy.
- We are disturbed by the implication that work has already started on the masterplan for the area around the station, in contradiction of the requirements of the NPPF and NMDC that community engagement should be a central part of all stages of the process, from scoping and analysis onwards.

6.2. The statement that 'There is a good selection of comparison and convenience shopping, with several high-quality 'national multiple' retailers' is mistaken. There are currently (January 2022) nine national multiples on St John's Road (other than food shops); three in the main entrance to the station; two on Northcote Road; and none on the other streets.

6.3. The reference to artists' studios on Lavender Hill, many of which are located in the Battersea Business Centre is misleading, since the Centre is a considerable distance from the town centre and indeed beyond the area covered by the Spatial Area Map 6.1.

6.4. The reference to an office building at 7-11 St John's Hill is false. The upper floors, above Barclay's Bank and two shops on the ground floor, were converted into flats in 2017, following planning consent granted by the Council. Moreover, substantial parts of PCS House are used for other than office purposes.

6.8. The claims that the approved Masterplan for the York Road/Winstanley Regeneration Area includes measures to ensure that the area is well connected to Clapham Junction, that local people can access the station and town centre by foot or by cycle, and that it focuses on integration of the area with the area to the south of the railway are at the best misleading. The Master Plan includes no measures at all to improve access to the town centre.

6.9. The claim that Clapham Common and Wandsworth Common are within 300 metres of the town centre is again misleading. The two commons are at least 500 metres away from what the Plan terms the focal centre of Clapham Junction. Similarly, the claim that the town centre provides 'some small public open spaces' that provide seating and amenity is also misleading. There are only two very small public spaces, both at the junctions of residential streets with St John's Road, that provide any seating in the town centre.

6.10. The statement that a third of businesses on Northcote Road are restaurants, cafes or bars is misleading. Approximately a half of the protected secondary frontages are currently occupied by such businesses.

6.12. The scores for open space and nature in the town centre in particular are gross over-estimates.

6.13. Almost nothing is said in the rest of this chapter about delivery of key elements of the vision, including the provision of supporting infrastructure, development of social and community uses, improvements to north-south access and to public transport, reductions in traffic congestion, or creation of a network of open spaces. Similarly, there is nothing about delivery of the proposals for any of the site allocations. This is especially worrying since the Government has pushed into the very far future what this chapter terms the anchor and the catalyst for change: the much-needed comprehensive redevelopment of the station and surrounding railway land.

The Anchor for Change

While we welcome the commitment that a masterplan for the area around the station will be prepared in collaboration with stakeholders including the local community, we are disturbed to find that work on the masterplan has already started with the boundaries already set. This is not in compliance with the requirements of the NPPF and the NMDC.

Policy PM4 Clapham Junction and York Road/ Winstanley Regeneration Area

While we recognise that this strategy covers the nascent Opportunity Area in the London Plan, it fails adequately to acknowledge that the town centre and the York Road/Winstanley Regeneration Area are physically separated by the railway. Non-specific and probably non-deliverable suggestions that access and permeability between the two will be improved do not begin to address this problem.

There are no policies here relating to the core placemaking principles of efficient infrastructure and built resilience; or of engagement with nature to support biodiversity and climate change management. Nor is there any explicit reference to meeting local environmental, social and economic objectives and needs as set out in Chapter 2.

Placemaking 1c. The requirement to improve connectivity with direct and attractive routes to Clapham Junction can be implemented only to a highly-limited extent without complete redevelopment of the station, to include new routes under it and the railway.

Placemaking 3. See our comments under Anchor for Change

Placemaking 9. The first sentence rightly belongs in Placemaking 8, rather than in a policy relating in the main to the proportions, scale and coherence of the existing streetscape. The requirement that developments will be expected to increase the quantity of trees in the public realm and on movement corridors fails to take account of repeated studies reported to the Clapham Junction Business Improvement District and other local groups that underground services severely limit the locations in which trees can be planted, and that the scope for increasing their number is extremely limited. This policy is therefore unlikely to be implemented.

Inclusive Growth 3b. The policy against the amalgamation of units should be accompanied by one against the division or reduction in size of units at the risk of undermining their economic viability.

Inclusive Growth 4. The policy to support leisure and night-time uses should be qualified by reference to the preceding Policy 3, with its requirement to protect and enhance retail provision.

People First 1. The reference to a north-south route connecting to Cycle Superhighway 8 cannot be implemented without major redevelopment of the station; and the reference to additional cycle parking should take account of the need to avoid locations where – as it does in some cases at present - it adds to congestion for pedestrians on narrow and busy pavements.

People First 3. It is unacceptable that the Cultural Strategy refers only to the York Road Winstanley Regeneration Area and not to the Opportunity Area as a whole.

Spatial Area Maps 6.1 and 6.2. The viewpoint indicated under Falcon Road bridge would give a close-up view of dirty walls. It is surely mistaken. The reference on the two maps to the 'Clapham Junction Station Masterplan' is confusing. We presume the area shown on the maps covers what is referred to elsewhere in the Plan to the 'Urban Heart Masterplan'

CJ1. CJ1 ASDA, LIDL and Boots sites, Falcon Lane

This site includes, in addition to the three retail premises named in the title, a Network Rail signalling centre whose future is uncertain. Network Rail has also recently bought the Boots building. The site as a whole has featured as a site allocation for many years, and no significant development has taken place. Nothing in the Plan suggests that there has been any progress towards the 'redevelopment and intensification through a mixed-use development' suggested here, or that it is likely to take place in the foreseeable future. See our comments on delivery at paragraph 22.13.

- 6.20. The reference to a frontage to St John's Hill is mistaken. It should refer to frontages to Lavender Hill, Falcon Lane and Falcon Road.
- 6.24. Given the acknowledged and acute shortage of high-quality public space in the town the proposal to develop a small urban square on the Lavender Hill frontage should be pursued as a matter of urgency, with full community engagement in the development of the proposal.
- 6.26. It would critically damage the whole town centre if the significant amount of car parking space currently provided free for up to two hours were to be substantially reduced. But in any redevelopment parking space should be provided behind buildings, alongside the railway, rather than on street fronts.
- 6.28. What might be meant by providing "space for the pedestrian route to continue" from the southern portal of the Falcon Road bridge is wholly unclear. Even more important, there is a critical and urgent need to improve pedestrian facilities in Falcon Lane, which is at present highly dangerous for pedestrians seeking to cross at either end, at the right-angle bend, or indeed at any point along its length.
- 6.30. It is unacceptable that Tall Building Zone TB B5b 01 extends all the way up the slope to Lavender Hill. 15-storey buildings would be wholly unacceptable there, and incompatible with Placemaking Policy 1a that proposals should 'respectful of existing character and scale and well- integrated with the surrounding townscape'. and with Policy LP1 A1 that developments should 'ensure a high level of physical integration with their surroundings'.

CJ2 Clapham Junction Station Approach

- This site also has a long history as a site allocation. See our comments on delivery at paragraph 22.13.
- 6.32. There is different and unacceptable terminology used here in relation to the Urban Heart Masterplan as compared to that in the CJ1 site allocation (6.21), where it is stated that the site 'should be considered as' part of the masterplan. Any work that has already started on the masterplan is incompatible with the NPPF and NMDC requirement for community engagement at every stage from scoping onwards.
- 6.36. The reference to St John's Road is wrong. It should be to St John's Hill.
- 6.40. See our comment on 6.28
- 6.43. It is unacceptable that tall building zone TB-B5-01 would allow buildings up to 15 storeys high. That is incompatible with Placemaking Policy 1a that proposals should 'respectful of existing character and scale and well- integrated with the surrounding townscape'.

CJ3 Land on the corner of Grant Road and Falcon Road

- This site also has a long history as a site allocation. See our comments on delivery at paragraph 22.13.
- 6.50. See our comments on 6.28 and 6.40 about the provision of 'space for the pedestrian route to continue.
- 6.51. The requirement to strengthen links with the town centre is not deliverable without providing another public access tunnel under the railway; and that is not feasible without major redevelopment of the station.

CJ4 Land at Clapham Junction Station

- 6.53. This site allocation fails to take account of the implications of the Station Master's House being a listed building.
- 6.56 Access to the site is via the narrow Plough Road, and cycle infrastructure needs to be improved there as well as on St John's Hill.
- 6.58. Since the ground level of the site is 20 feet or more below St John's Hill, it is difficult to see how the permeability referred to here is to be achieved. And the cross reference to links between the Winstanley regeneration area CJ5 and the station/town centre does not work. Paragraph 6.68 says even less than is said here.

CJ5 Winstanley / York Road Regeneration Area

Since a masterplan has already been approved, and work is already under way to implement it, we see little point in this site allocation.

CJ6 Peabody Estate, St John's Hill

Phase 2 of the development of this site is now nearing completion, and planning applications have been submitted for the final Phase 3 and will be determined before this Plan comes into force. Again, we see little point in this site allocation.

CJ7 36-46 St John's Road and 17 Severus Road

While we welcome the inclusion, of this site allocation, albeit at a late stage, it is unsatisfactory that the Council has refused to accept the case for including in the strategy for Clapham Junction a site allocation for the nearby, similar-sized and under-used Territorial Army Centre.

Chapter 11. Area Strategy for Wandsworth's Riverside

This strategy is misnamed and incoherent. It has little to say about the vast majority of the riverside between Beverley Brook and Vauxhall, apart from one policy relating to the riverside at Putney. Rather, it focuses on the area between Wandsworth Bridge and the Cremorne Railway Bridge. Although it is described as an "overarching" strategy, it has nothing to say about the riverside aspects of the strategies for Putney (section 7), Wandsworth Town (4), or Nine Elms (5). Moreover, only one of the site allocations (RIV 6) actually extends to the riverside; and others, including RIV 9, 10 and 11 are a significant distance away from it.

At no point in this Chapter is there any reference to the London Plan Policy D9 requirement that developments along the river should protect and enhance the open quality of the river and the riverside public realm. Nor does it refer to the Thames Policy Areas identified in Chapter 9 of the London Plan. Just as unacceptable is the failure to make any attempt to cross refer to the overlapping Policies LP58 and 59 which deal respectively with river corridors and with riverside uses, including river-dependent, river-related and river adjacent uses. The policies are differently worded, and it is far from clear that they are consistent.

The Section should be divided into two, providing

- a comprehensive overview of the public realm, and general development management strategies and policies for the waterfront from Putney to Vauxhall, including Policies LP58 and LP59. Site specific and other issues such as employment could be dealt within this strategic framework, but also in the relevant chapters with cross referencing as appropriate.

- strategies and policies covering the York Road/Lombard Road area, including much more emphasis on the traffic and transport issues than included in the current draft. These should include the need for a pedestrian and cycle bridge at Cremorne (the so-called Diamond Jubilee Bridge, which as we noted at paragraph 2.90 the Council believes has little prospect of being built); and plans for a study into the desirability and feasibility of re-opening the station at Battersea High Street.

11.6. The statements here about promoting the ‘type of provision [that] would sit more comfortably alongside new residential development’ fail fully to meet the commitment in Policy SDS1 E3 that the Council will seek a net increase in the provision of industrial floor space.

11.11. The claim that there is a colonnade connection between Ransome’s Dock and Elcho Street is false, the colonnade actually links through to Parkgate Road. Elcho Street, although a through route to the river, does not connect directly with Ransome’s Dock at present. And the claim that the proposed Diamond Jubilee Bridge will be erected is incompatible, as we noted at 2.90, with the Council’s recent statement that there is *Currently limited prospect of pedestrian bridge to link riverside with Imperial Wharf given current TfL finances and DfT’s priorities.*

11.18. The Vision point 4 is again incompatible with Policy SDS1 E3, since it would result in a loss of industrial land. And it is at best in tension with Policy PM9 Inclusive Growth 4.

Policy PM9 Wandsworth’s Riverside

As with the policies set for other area strategies, there is no clear relationship between these policies and the 14 principles set out in Chapter 3, or to the other themes in the spatial strategy in Chapter 2. There is no reference, for example, to the placemaking principles of traffic management and the provision on good public transport, or to the delivery of efficient and resilient infrastructure; or to the inclusive growth principle of promoting work and opportunity; or to the people first principles of maximising health and well-being, or facilitating lifestyle choices. The Plan’s failure - despite repeated requests to the Council – to consider the impacts on traffic in general, and public transport in particular, of the intense development of the York Road/Lombard Road area is unacceptable. The policies set out here also fail to acknowledge the noise pollution associated with the heliport. They are thus in tension with the environmental objective set in Chapter 2 and what is said in paragraph 15.85 about measures being taken to reduce or mitigate such pollution.

It is also unacceptable that these policies make no reference to the recommendation of the Urban Design Study that “building form must strike a balance between achieving optimal riverfront views without creating a dense wall of development that blocks visibility from buildings and public spaces behind it”. Perhaps this is because many existing developments have failed to strike that balance. The policies are not consistent with London Plan Policy D9 C 1f. We note also that there is no reference to the policy under LP 52 B1 that the Thames Path should be at least six metres wide, an aspiration that is not met at present on many parts of the Path in Wandsworth.

As we have already noted, the weakness and inconsistency of the policies relating to industrial – as distinct from the broader ‘economic’ – floorspace is unacceptable. The York/Road Lombard Road area is identified in Chapter 18 as an Economic Use Protection Zone, and the site allocations include several sites (RV1, 4, 6, 7 and 8 for example) currently operate successfully at present for industrial uses, but nothing is said about protecting or enhancing that use. The policies and the site allocations are thus not consistent with Policy SDS1 E3, or with the further policies set out in Chapter 18. It is also unclear how the encouragement of arts and cultural activities (as mentioned in PM9, People First, 4) sits alongside the industrial activity. This further argues for separate treatment of this dynamic part of the Borough.

Site allocations

Most of the site allocations are relatively small (some very small). Many of them – RIV1, 2, 4, 7 and 8, for example – were identified in earlier Plans, but have seen little or no development, even where planning consents have been granted (in many cases for buildings considerably taller than the 7-10 storeys indicated as appropriate for tall buildings zones TB B2 02, TB B2 05 and TB B2 06 in Appendix 2). But there is no attempt to suggest measures to make the sites more attractive to developers, for example by creating the kinds of clusters suggested in Chapter 3 (cf the clusters identified for Nine Elms and Wandsworth Town). It would seem obvious, for example, that the RIV2 Dovercourt site might useful be combined with the contiguous RIV6

Lombard Road site; and it is baffling that the RIV4 Gartons Industrial Estate site is not combined with the adjoining RIV10 Travelodge site.

This is despite the Council's adoption in December 2015 of Supplementary Planning Guidance (SPG) for the Lombard Road/ York Road Riverside Focal Point and the commitment in the 2016 SSAD to develop an Area Spatial Strategy, to provide further detailed consideration of this area. The current Plan seems to represent, without explanation, a highly-regrettable step back from that SPG. This is made worse by the exclusion of some sites where proposals have been submitted to the Council, including the York Road petrol station and the Access Storage sites. See our comments on delivery at paragraph 22.13.

- *RIV3 11-25 Chatfield Road and 41-47 Mendip Road.* It is difficult to understand why this site, which is shown incorrectly on the map, is included as a site allocation. Following a planning consent (2019/5484) awarded in 2020, building work is already well under way. Ideally the site should have included numbers 27-39 Chatfield Road as well. This failure to secure agreements between landowners is a classic example of the Council's inability to maximise the possibilities for high-quality development.
- *RIV5 York Road Business Centre.* The definition of this space is most odd. On the corner of Holman Road and Lombard Road, Phase 1 of the development was completed in 2020, with self-storage facilities, artists' studios and office space. Building is now under way on the site facing Yelverton Road, following permission granted in 2020 (2019/2295). Only Phase 2 of the Business Centre development remains to be completed. Consent was granted for a 20-storey residential tower on the corner of York Road and Lombard Road in 2019 (2018/3776), but it has not yet been built. A new application has now been submitted for a 23-storey co-living development, which is not compliant with the policies set out in this draft Plan.
- *RIV7 Travis Perkins, 37 Lombard Road.* This site has a long history as a site allocation. See our comments on delivery at paragraph 22.13. The building supplies business on this site is busy, and it is difficult to believe that it could be combined with the mixed-use development proposed. Nor is it clear where Travis Perkins could find a similar well-connected site elsewhere in the borough.
- *RIV9 The Chopper P.H., 58-70 York Road.* This site, on which a fourteen-storey building is now nearly complete, should be removed from the site allocations.
- *RIV11 Battersea Church Road/Crewkerne Court Garage, Somerset Estate.* The extremely confusing statements at 11.76, and the mapping of tall buildings zone TB B1 05 along with mid-rise building zone MB B1 10 in Appendix 2 are unacceptable.

Chapter 13 Site Allocations Outside the Spatial Areas

- *OUT2 259-311 Battersea Park Road:* This site also has a long history as a site allocation. See our comments on delivery at paragraph 22.13. So little is said about this linear site and its design requirements that it is difficult to discern the point of this site allocation. There is no reference to the new Eden Court retirement development; and piecemeal retail, commercial and public service development is likely to continue across the site. The statement that a new library 'could' be provided is unacceptably weak. The area lacks social infrastructure and facilities, and a new library certainly should be *provided*. While a street frontage would be desirable, it would make sense to divide the site up into its constituent parts.
- *OUT4. Randall Close Day Centre and adjacent Surrey Lane Estate Car Park.* The boundaries of this site inexplicably exclude the adjoining Mission Hall, for which the Council has approved an application for redevelopment. The Society also has strong reservations about the proposals, recently approved, for three new buildings on the site with no detailed consideration of how they might be more effectively integrated with the rest of the Surrey Lane Estate and the redeveloped Mission Hall.
- *OUT5. Bridge Lane Medical Group Practice.* It is difficult to understand why this small site is included as a site allocation. Any proposed development will be small in scale and readily assessed according to the generic policies in this Plan. And the site fronts on to Battersea Bridge Road, not Cambridge Road.
- *OUT6 Haydon Way.* The reference here to 'retention' of a care home that was abandoned as unsuitable many years ago is difficult to understand, and incompatible with the proposed co-living development approved at appeal in 2021.

Chapter 14. Achieving Design Excellence

LP1 Urban Design

A.6. This policy's reference to 'spaces with their edges defined by buildings' provides a green light to developers who wish their buildings to cover their entire site, and thus to sit uncomfortably close to narrow pavements and roads.

A.9. This policy on access makes no reference to the need for off-road provision for servicing, deliveries, set down and pick up and for disabled parking. Most roads in Battersea are heavily trafficked and the Council's aim should be to avoid all on-street stopping and parking along main roads.

B. The policies and actions outlined here do not go far enough. Transparency – including making public any pre-application advice and responses to it - is essential if the faults of the past are to be avoided. The policy also fails to acknowledge that masterplans have frequently been subverted by the submission of large numbers of reserved matter applications, and by the selling on of sites with no requirement to respect a masterplan. This problem is exacerbated by the lack of transparency and regular review – especially of the *cumulative* effect of changes - and lack of support for community engagement with respect to amendments.

LP2 General Development Principles

- A. The blanket requirement for developments to provide for a mix of uses is incompatible with Policy SDS1 E3 that the Council will seek a net increase in the provision of industrial floor space.
- B. While we support the principles relating to the effects on neighbours as well as on current and future occupiers and users it is unacceptable that many developments in the borough over the past decade - at Nine Elms and elsewhere - fail to meet the standards outlined in paragraphs 14.10-14.12. Without enforcement, this policy will not be delivered.
- C. This policy fails to recognise the constraints on adding to transport infrastructure: lack of space and lack of funds from TfL and Network Rail to ease congestion and overcrowding in a comprehensive manner.
- F. This policy fails to recognise that the new town centre at Battersea Power Station will have an inevitable negative impact on Clapham Junction and other local centres in Battersea.

LP3 The Historic Environment

While we support these policies, they will prove to be nugatory unless the Council has an adequate number of specialist conservation officers and that their advice is fully respected (as it has not always been in the past). We also note that reviews of the appraisals of many conservation areas are long overdue; and that on current plans many will not be reviewed for several years.

14.19. It is unsatisfactory that Heritage Statements or Design and Access Statements are not required to support any significant development in conservation areas.

Local Views 4, 5 and 6

The claimed views have not been protected. There are very few parts of Battersea Park or Queenstown Road from which one can see the four chimneys of the Power Station; and none on Chelsea Bridge south of the central span.

LP4 Tall and Mid-rise Buildings

The policies outlined here do nothing to guard against developers routinely paying a price for land which assumes the Council will find persuasive their need for height and density to provide viability. They thus carry the danger that they will perpetuate the vicious circle of over-priced land and over-tall and dense buildings.

B, and Appendix 2. The tall building zones identified in Appendix 2 cover large parts of Battersea and - despite the qualifications at paragraphs 14.29-14.31 about not covering the whole zone with tall buildings - they are far too extensively drawn and would allow for unacceptable over-development of excessive height in their context. This applies especially to Zones TB-B3a-01, near Battersea Park Station; TB-B3a-02, south of Queenstown Road Station; and TB-B5-01, TB-B5a-01, and TB-B5b-01, around Clapham Junction. In all these

cases, the heights proposed would result in developments incompatible with Placemaking Policy 1a that proposals should 'respectful of existing character and scale and well-integrated with the surrounding townscape'. and with Policy LP1 A1 that developments should 'ensure a high level of physical integration with their surroundings' (see also Policy LP B7).

B5. The requirement for 3D modelling should specify that it should show the bulk of the proposed building, not simply a red outline. It should also state that views taken with wide-angle, short-focal-length cameras are not acceptable.

B9, 10 and 11. The thrust of these policies may be welcome. But too much has been lost already, and they come too late. Their application would have prevented many of the buildings erected along the Thames over the past decade. Policy B11 on set-backs from the Thames Path is meaningless unless the width of the Path is specified (see Policy LP 52 B1 which specifies that the Thames Path should be at least six metres wide).

B15. Shade analysis should include the effect of shade on planting.

14.36. The suggestion that adverse effects might be 'appropriately mitigated' gives too much away and is unacceptable. Adverse effects should be *avoided*, not *mitigated*.

LP5 Residential Extensions and Alterations

The reference in A7 to the need for hard-standings to conform to the relevant Conservation Area Appraisal Strategies (CAAS) should be made applicable to all aspects of the policy.

LP6 Basements and Subterranean Developments

It is unacceptable that the Policy makes no reference to the need to avoid damage to neighbouring properties, or the need to avoid neighbour nuisance such as noise from lower-level extensions, light nuisance from subterranean roof-lights etc.

A8. The provision of pumps to 'mitigate against' the risk of flooding should be reworded to 'avoid' that risk.

Chapter 15 Tackling Climate Change

15.2 The target 'to become a carbon neutral/zero carbon *organisation*' is unclear. Does it refer to development and planning across the borough or is it limited to the carbon footprint of council buildings and in-house activities such as vehicle fleets or staff transport policies. Some elements of the WESS Action Plan imply the latter but the Local Plan surely addresses the former. The target to "establish Wandsworth as the greenest borough in inner London" is meaningless unless clear criteria are set against which it will be measured.

LP10 Responding to the Climate Crisis

The first two sentences of this policy are simply repetitive.

A4. The aim to 'maximise the use of river for freight' could be in tension with LP59 A4 which states development will be supported that 'protects and enhances the habitat value of the river and shoreline, promotes the naturalisation of the riverbanks where feasible, and does not cause harm to the operation of the river regime, or its environment, biodiversity or archaeology (including to its banks, walls and foreshore)'.

B1 and 2: The requirement for high standards such as meeting BREEAM 'Outstanding' is unacceptably weakened by saying 'unless it can be demonstrated that this would not be technically feasible.' This caveat is symptomatic of many policies throughout planning documentation. Moreover BREEAM is a measure of what *is* technically possible so the caveat is effectively an oxymoron and actually means 'unless it there is no aspiration to meet this standard'

B3: That the BRE Home Quality mark to 'will be expected' is too weak, and should be replaced by 'required'.

The great majority of the houses and other buildings that will exist at the end of the Plan period, and even in 2050, already exist. The policy's reference to 'support' for retrofitting, along with the statements in paragraph

15.10 about retrofitting the buildings responsible for the great majority of emissions, is unacceptably passive and weak.

LP11: Energy infrastructure:

This policy does not fully meet the requirements of the London Plan Policy SI 3 C, that the Plan should identify proposed locations for future heat and cooling networks; or SI 3 D, that major development proposals within Heat Network Priority Areas – or even in what this Plan calls Decentralised Heat Opportunity Areas - should have a communal low-temperature heating system.

The requirement ‘to consider’ the installation of low, or preferably ultra- low NOx boilers is unacceptably weak.

LP12. Water and Flooding

It is unsatisfactory that the references to Zones 1-3b are not supported by a map illustrating those zones; in its absence, the Map 15.2 illustrating surface water flooding risk is potentially confusing.

B. The reasons for excluding areas covered by an Area Strategy plus a 400m buffer around town centres is not clear. Indeed, the statement in paragraph 15.32 that ‘it is not reasonable for future development within the borough’s key growth and investment areas to be located within areas of lower flood risk elsewhere’ is as drafted nonsensical. And the statement in the same paragraph that developments ‘will need to follow a sequential approach for the final layout and design *where possible*’ is unacceptably weak.

Overall, this section of the Plan, and the SFRA, seriously under-estimate the likely frequency and risks associated with flooding, as the current London Flood Review is demonstrating.

LP13 Waste management

Wandsworth has a poor record on recycling with only around 22% of Local Authority Collected Waste being currently recycled when the London Plan sets out a target of 65%. by 2030.

While the Local Plan adequately addresses requirements for provision of recycle *facilities* themselves, there is insufficient provision in the Plan to ensure that the proportion of recyclable waste actually reaching these facilities can be increased e.g. through requiring on-site recycle collection facilities in privately owned blocks or adding recycling sections to on-street waste bins. The Council should carry out a study of best practice in other London boroughs and set out a programme designed to achieve the target of 65% within the next nine years.

LP14 Air Quality, Pollution and Managing Impacts of Development

A-D *Air quality*. The Plan recognises (paragraph 15.79) that there are ‘several areas of the borough that do not comply with air quality targets and action must be taken to control, minimise and reduce the contributing factors of poor air quality’ But this policy falls far short of meeting the requirement to provide strategic, site-specific and area-based policies, should seek opportunities to identify and deliver improvements to air quality. For it specifies only passive responsive action by the Council; and the Council’s Air Quality Action Plan falls far short of the action required.

Policies D3 and D4 seem to say much the same thing.

Chapter 16 Providing for Wandsworth’s People

It is unacceptable that there is in this chapter no mention of the objective in the Joint Health and Well-Being Strategy (see paragraph 2.47) to reduce ‘the differences in health and life expectancy between the wealthiest and most deprived people’. Nor indeed does it mention the deficiencies in social infrastructure noted at paragraph 2.66, or any of the social objectives set out in Chapter 2, which aim to ‘reduce poverty and social exclusion’; to ‘ensure’ the provision of suitable homes for people in various circumstances, along with community and social facilities, education and training facilities, and healthy environments; and to ‘review’ poorly performing buildings. The language in this chapter talks instead of supporting and promoting various

developments, or guarding where possible against loss, with little or no positive action required by the Council. The whole chapter is therefore incompatible with the strategies and objectives set out in Chapter 2. It is also deficient in failing to say anything about health, social care and educational infrastructure and services; or about sports facilities, or the provision of public toilets. In all these respects it does not meet the requirements of the London Plan.

LP15 Health and Wellbeing

It is unacceptable that there is no mention here of measures to reduce differences in health. Nor is there any mention of the use of health impact assessments for new developments, or the loss of existing facilities and services.

B1-6. We note that the Council's record over the past decade in guarding against loss of services including community spaces, medical and health facilities, and pubs is at best mixed.

LP17 Social and Community Infrastructure

This policy is unsatisfactory since it says nothing about the Council's role and responsibilities in providing social and community infrastructure, beyond supporting and enabling developments proposed by others. It does not even mention any of the issues and problems relating to the delivery of such infrastructure set out in the Infrastructure Development Plan (IDP). Nor does it say anything about health and social care infrastructure, or address the issues set out in Policy S2 of the London Plan relating to health and social care facilities.

L19 Play Space

Neither this policy nor LP 20 says anything about the borough's deficit in places for sport, as acknowledged in the IDP.

LP20 New Open Spaces

The statement at paragraph 16.49 that "New open space should be green space such as a local park, however (sic), civic spaces can be considered" is nonsensical, and incompatible with statements elsewhere in the Plan about the provision of new open spaces (for example in Chapter 6, paragraphs 6.24, 6.34 and 6.84; such examples could be multiplied).

LP21 Allotments and Food Growing Spaces

A and C. While we welcome the requirement for food-growing spaces to be included in major developments and for fruit trees to be considered in any new development, it is very odd that these requirements are not mentioned in Policies LP1 and/or LP2. And it is unacceptable that the policy, like the Infrastructure Development Plan (IDP), requires no action from the Council to tackle the acknowledged huge deficit in the provision of allotments.

LP22 Utilities and Digital Connectivity Infrastructure

This policy is seriously deficient and unacceptable, not least because there is no clear relationship between it and Policies LP 11 (energy infrastructure), LP12 (water and flooding) and LP13 (waste), or to the IDP.

The IDP refers (page 27) to this policy stating that it 'outlines how new infrastructure to support a proposed development will be required'; but that is at the best only very partially true. It then goes on to claim that 'This will ensure that any new proposals ...will bring forward additional provision to meet the new demand', which is an obvious non-sequitur: outlining a requirement does not ensure that it will be met, particularly by an enabling approach. This applies to infrastructures as a whole, where we note that the IDP identifies no major infrastructure projects.

Given the importance attached to digital infrastructure here, as well as in the goals for 2038 set out in Chapter 2 and in the Placemaking principles in Chapter 3, it is unacceptable that it features so little (if at all) in the area strategies in Chapters 4-13; and that even in this policy the Council proposes only an 'enabling approach',

rather than active measures to improve digital connectivity while minimising any negative impact on the environment.

Chapter 17 Providing Housing

The policies set out in this chapter do not meet the test of soundness because they take as a given – something about which the Council believes nothing can be done – Wandsworth’s recent and current high levels of inward and outward migration by young adults. But these very high levels of migration - amongst the highest in the country - are unsustainable and result in a population highly skewed by age, especially in Battersea, which has the highest proportion of 25-34 year-olds in the UK. They are also incompatible with the Council’s aims, set out at several points in Chapters 2 and 3 (2.58, 2.81-82, 3.16) and in the area strategies, to establish what are variously described as cohesive, inclusive, mixed, balanced, settled, blended and stable local neighbourhoods and communities. Those aims are repeated regularly throughout this chapter, and they have implications for all aspects of housing provision, especially in relation to affordable housing and housing mix. But the Plan fails to recognise that the policies outlined here will exacerbate rather than easing the problem.

LP 23 Affordable Housing

This policy fails the test of soundness because it does not meet the borough’s needs. The Local Housing Needs Assessment (LHNA) notes that there are 8,800 households on the Council’s Housing Register, and it estimates that there is a need for nearly 3,600 affordable homes each year over the Plan period, nearly twice the overall target for new homes. In that context, LP23A’s statement that the Council will ‘seek to maximise the delivery of affordable housing’ and ‘contribute’ towards the London Plan’s target that 50% of all new homes should be affordable is far too weak. The Council has a long record of failure in seeking to meet even its current targets of 33% affordable homes across most of the borough and a deplorable 15% in Nine Elms. The Council’s record over the past decade suggests that viability assessments repeatedly conclude that even the minimum thresholds are unachievable.

The 50:50 tenure split between low-rent and intermediate products represents a significant and damaging change from the 60:40 split in favour of affordable rent in the current Plan, and it is not justified by evidence of the need for low-rent housing. The justification offered in paragraph 17.11 is convoluted and unconvincing, since it is based on the argument that the Council will not be able to meet the demands of people whose objective need is for social housing, but who will not be high enough up its priority list. For many of those people, the intermediate products will be unaffordable, especially since London Affordable Rents have tended to be set at a higher level in Battersea than in neighbouring boroughs. Moreover, for those who can afford intermediate products, evidence suggests that tenures such as equity sharing have not met the policy goal of providing a route to home ownership.

17.16. It is unacceptable that the Plan does not fully accept the London Plan policy that that the proportion of affordable housing in a scheme should be measured by habitable rooms, in order to ensure that affordable homes are delivered in a range of sizes, including family-sized homes. Its hedging around this provision by requiring developers to provide measurement by units and by floorspace seeks to retain comparisons that offer incentives to provide too many small units, especially studio accommodation and one-bedroom flats.

LP 24 Housing Mix

We have noted above that the current levels of inward and outward migration, especially by young adults, are incompatible with the Council’s aim to establish stable local neighbourhoods and balanced, cohesive communities. But both the LHNA and the figures in this policy fail to recognise that the current and projected over-provision of small units stimulates inward migration of younger adults, while the under-provision of family-sized units stimulates outward migration by people seeking such housing. Wandsworth, and more especially Battersea, have a higher proportion of one-bedroom units, and a lower proportion of three-to-four-bedroom units, than the London average; and the dearth of family-sized housing, available at prices that young adults can afford, is a key driver of outward migration and militates against the creation of stable and cohesive communities. The policy of focusing new housing provision, both for the market and (even more so) for the affordable housing sectors, on one-bedroom and two-bedroom units is thus perverse. It is also incompatible with the Vision at paragraph 2.58 which specifies greater choice in the type, size and tenure of housing, particularly for families.

The provision of new family-sized housing should be a priority for the Council; but it has not in recent years met even the limited proportions of three-four-bedroom-units set in previous Plans. The new Plan's reliance on limited measures set out in LP 25 and LP26 to guard against the sub-division of existing family-sized houses, concentrated among the Victorian and Edwardian terraces typical of many parts of south Battersea, is simply unacceptable. It will exacerbate existing imbalances and inequities between different parts of Battersea, with similar effects in the rest of the borough.

LP25 Protecting the Existing Housing Stock

Policy C, and paragraph 17.24, fail to address the problems caused by the rapid expansion of AirBNB and related services, and the related reductions in housing for permanent residents. They say nothing about the enforcement of the 90-day rule, under which houses can be used for overnight accommodation with damaging consequences for residents nearby.

LP 29 Housing with Shared Facilities

While we support the proposed resistance to large-scale purpose-built shared living accommodation, we note that even as this Plan was being prepared, the Council has approved applications for such developments in direct contravention of the proposed new policy C1.

17.44. The wording of the first sentence here represents a significant weakening of Policy LP29 C1, and it is not acceptable.

LP 30 Build to Rent

The requirement to provide where possible a separate core and/or block to provide low cost rented housing to be managed by a registered provider contravenes the London Plan Policy H11 which requires 'unified ownership and unified management of the private and Discount Market Rent elements of the scheme'. It is also incompatible with Policy LP27 in this Plan, which requires that housing must be designed to be 'tenure blind' to ensure that dwellings across all tenures are indistinguishable from one another in terms of quality of design and materials, space standards and access'. It is therefore unacceptable.

LP 31 Specialist Housing for Vulnerable People

This policy fails to refer to Policies H12 and H13 of the London Plan, or to meet some of those policies' key requirements, relating for example to inclusive design, or the need for drop-off and pick-up points.

The LHNA shows a huge under-provision of specialist housing compared with the guidelines suggested by the Housing Learning and Improvement Network (LIN). But no measures are indicated here to remedy that imbalance between need and supply. The LHNA also suggests that adapting existing homes should be a priority for disabled people under 65. This is reflected at paragraph 17.55 in the Plan, but it is not included in the policies set out here. It should be.

Chapter 18: Building a Strong Economy

LP33. Promoting and Protecting Offices

Although there have been some mentions of Economic Use Intensification Areas (EUIAs) and Economic Use Protection Areas (EUPAs) earlier in the Plan, it is unsatisfactory that up to and including this point, there has been no explanation of what they are., or where they are located. It is thus also unsatisfactory that they are included here as suitable locations for offices, with no explanation, for which we have to wait until paragraphs 18.49 to 18.54. The same might be said of Focal Points of Activity (paragraphs 18.55ff), which are inexplicably missing from among the suitable locations for offices in this policy.

LP34. Managing Land for Industry and Distribution

The policies here focus on protecting and retaining existing industrial land; and they are therefore at best in tension with Policy SDS1 E3, which seeks an *increase* in industrial floorspace. There is no indication of how the net requirement identified in the Employment Land and Premises Study 2020 (ELPS) - 8.6 hectares of industrial land, or an additional 35,700 sqm (a land equivalent of 5.5ha), required to accommodate demand for core industrial uses - will be delivered. Reliance on the oft-repeated 'intensification' of the use of existing sites is

completely unrealistic. There are no details of the amounts of additional floorspace that could be provided in specific locations, either in the area strategies or in this chapter.

LP35 Mixed Use Development on Economic Land

Mixed use development is specified in all the Area Strategies (Chapters 4-12). It is unacceptable that none of them includes a cross-reference to the requirements set out here.

It is odd and unacceptable that town centres and the nine local centres are not specified here as locations suitable for mixed use development.

18.49-55. The distinctions between Economic Use Intensification Areas (EUIAs), Economic Use Protection Areas (EUPAs) and Focal Points of Activity are not well-articulated, nor are their roles made clear.

Chapter 19: Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres

The policies set out in this chapter will need urgent review in the light of the changes since the pandemic, which has had a catastrophic effect on many businesses in the borough's town centres: there must now be huge uncertainty about the projections set out in the Retail Needs Assessment (RNA) completed in the first half of 2020. Supporting the recovery of town centres and businesses must now be a key strategic aim for the Council, working with other bodies including the Business Improvement Districts and the GLA's London Recovery Programme. Some of the policy objectives set out in this chapter, including the promises of protection for the key characteristics of the borough's town centres, do not take full account of recent changes in Government policy, such as the creation of Class E, and the extension of PDRs to allow the conversion of any Class E premises to residential use.

But there is little evidence in the Plan of the kind of innovative thinking emerging from the High Streets Task Force and other sources: developing structures for engagement and participation with local communities and other stakeholders; developing organisational resources and skills; promoting new community uses; experimenting and prototyping without fear of failure; innovations in asset management. These and other things are essential if the Council is to work effectively with others in re-imagining what high streets might be.

The policies also fail adequately to recognise the relevance and impact of policies set out elsewhere in the Plan. While we recognise that the Plan must be read as a whole, it is unsatisfactory that several policies - including LP 17 on social infrastructure; LP 19 on play spaces; LP20 on open spaces; LP35 on mixed use developments; and LP37 on requirements for new economic development – make no reference to the needs and the potential of town centres and local centres. By contrast, other policies that do focus on town and other centres, such as LP 18 on arts and entertainment, are not considered in this chapter at all.

LP41 Wandsworth's Centres and Parades

The RNA suggests that the Council should review its town centre and other boundaries, and its strategic approach to designated frontages, which have not been reviewed for many years. But the Council has not done so, and this policy is thus unsound and unacceptable. The many oddities in Battersea include, for example,

- the failure to designate any part of St John's Hill west of the railway bridge either as part of Clapham Junction town centre or as a local centre (the designation of nos.115-141 as an important local parade ignores the important commercial premises at nos. 91-111 and 143-171, as well as nos. 110-142 on the north side of the road);
- the failure to provide any designation for the commercial premises at nos. 83-175 Lavender Hill, or to include them in the Queenstown Road/Lavender Hill local area;
- the exclusion of nos. 324-356 in the Battersea Park Road local area; and
- the failure to provide any designation for the commercial premises on Falcon Road north of the railway bridge.

The distinction between those properties and others which are designated, such as nos.35-56 and 65-71 Webb's Road is incomprehensible. There are many other unexamined peculiarities relating to town and local centre boundaries, and to the distinctions between core, secondary and other frontages across the borough. The current designations are not fit for purpose, which may lead to perverse decision-making.

LP 42 Development in Centres

Key aspects of this policy may be desirable, but non-deliverable as a result of the introduction of the unified commercial Use Class E and the permitted right to change any Class E premises to residential use.

Policy LP42 B is unsound and unacceptable. The designation of core, secondary and other frontages as set out at paragraph 19.17 has not been reviewed as recommended by the HNA; and in many cases, such as the Lavender Hill/ Queenstown Road local centre, the designations are irrational.

LP 45 Evening and Night-Time Economy

While we acknowledge that the Council is currently developing a night-time strategy for the borough's town centres, it is at best disappointing that in the policies neither for Clapham Junction nor for town centres generally (Chapter 19) is there any reference to Policy HC6 in the London Plan, or to key issues that it covers, including the integration of planning and licensing; diversifying the range of services; or the use of the public realm. The policy also underplays the role of Clapham Junction as a regional hub.

LP 46 Visitor Accommodation

While the policy to restrict new visitor accommodation to town centres and to avoid undesirable impacts elsewhere is welcome, it fails to acknowledge the number of hotels that have already been approved elsewhere, along with new proposals now being considered. It also fails to recognise the highly damaging impacts of the growth and concentration of AirBNB and similar services in other parts of the borough. The failure to monitor or enforce the 90-day rule exacerbates these problems, and it needs to be tackled as a matter of urgency.

LP 47 Markets

This policy fails to recognise the extent to which street markets in Northcote Road, Battersea High Street and elsewhere have declined in recent decades, for reasons including the loss to approved development of the necessary off-street yards for storage; or the need for active measures to sustain and revivify them. Promises to protect what remains, along with passive measures to support proposals for expansion do not go far enough.

LP 48 Meanwhile Uses

We believe meanwhile uses are important and should be both encouraged and supported. On major development sites initiatives such as that of Westminster Council's in Ebury Bridge Road has both enlivened the street and provided a valuable community resource. We have already recommended that the new school site in Nine Elms should follow this excellent example and are pleased that CGMA are also receptive to meanwhile uses.

Chapter 20 Sustainable Transport

The policies set out in this chapter are unsatisfactory because they do not address the major barriers created for cyclists and pedestrians by overloaded junctions and through routes. These have been exacerbated in recent years by new developments with poor provision for public transport and other forms of active travel. This chapter states (20.10) that 'The Council's key transport challenge is therefore to ensure the provision of the additional sustainable transport capacity that is needed to support its housing objectives and deliver economic recovery, regeneration and growth'. But despite the acknowledgment at paragraph 2.73 and in the IDP that congestion and overcrowding of public transport is a major problem – which will be worsened if the shift from cars to active travel and public transport specified at several points in the Plan actually occurs - nowhere does this chapter state how the additional capacity is to be achieved.

The policies make no reference to key issues outlined in many documents such as TfL's *Streetscape Guidance*, including footway and carriageway materials, interfaces and transitions; the use of tactile paving; controlled and uncontrolled crossings; footway amenities including street furniture; traffic signs and barriers; or street lighting. And the treatment of bus and train services and infrastructure is so slight as to be worthless.

LP49 Sustainable Transport.

This policy is very poorly drafted. The final clauses of LP49 A have only an indirect relationship with transport. And LP49 1-5 demand of developers not so much provisions that they might reasonably be asked to make, but the delivery of policy objectives and outcomes that neither they nor the Council can guarantee to meet.

B: The policies here and in the explanatory paragraphs 20.13-15 refer to the Mayor's 'Healthy Streets' policy which is said to be 'at the centre of transport planning'. It is thus very odd indeed that the policy and its objectives are not mentioned at all in Chapter 3's discussion of Placemaking, or in any of the area strategies when they come to discuss active travel. But nowhere in the Plan (or in the Council's draft Walking and Cycling Strategy) is there any reference to the Disability Discrimination Act (DDA) requirement (transgressed in many parts of Battersea and the rest of the borough) that a minimum of 1200mm width of footway should be provided and kept free of obstructions such as street furniture.

LP50 Transport and Development

A central flaw undermines this policy, since it assumes that existing public transport and road capacity is adequate and working well. That is not true in many parts of Battersea and the rest of the borough, where capacity in footways and carriageways, and bus and train services, is demonstrably inadequate.

A.1. The reliance on PTALs of 4 or higher is unsatisfactory, since it assumes that a high PTAL implies that there is sufficient capacity. The requirement in paragraph 20.21 that major developments should be located where there is both a high PTAL and demonstrably adequate capacity should be made explicit in this policy. Moreover, it is crucially important that assessments should be made of the cumulative effect, on footways and carriageways as well as bus and train services, of many new planned developments each of which individually may have only a relatively small impact.

A 4. This policy needs to specify that the improvements to the transport network can be delivered in a reasonable timeframe.

D. This policy is so poorly drafted as to be non-understandable. It is not clear whether it is intended to set a requirement that provision for improved transport is made, or a hope that the requirement once made will be honoured.

LP51 Parking, Servicing, and Car Free Development

This policy is unsatisfactory in failing to set a requirement for off-street space for set-down and pick-up. It also fails to meet the requirement in Policy H6 in the London Plan that all applications that include off-street parking should submit a parking design and management plan. Nor does it set the requirement that parking spaces in residential developments should be leased rather than sold.

A2. The cross-reference to Policy LP1 is unclear; for that policy makes no reference to parking.

F. The policy that on-street parking permits in CPZs will not be available to residents in new developments does not deal adequately with the acknowledged pressure on parking places, especially at evenings and weekends, when existing residents compete with residents of new car-free developments. Consideration should be given to extending the hours of parking control where pressure on spaces is high. And the policy that the threshold for withholding access to parking permits should be developments of more than 10 units should be set out explicitly in Policy LP51 rather than being hidden in paragraph 20.35.

LP54 Public Transport and Infrastructure

The policies here are unsatisfactory because they say nothing that might fulfil the objective set in Chapter 2 (page 22) of contributing to 'the efficient operation of London's overall transport system, with improved access by foot, bicycle or public transport to and from surrounding areas, particularly central London'. Nor do they take account of the requirements set in several of the area strategies – including Nine Elms and Clapham Junction - for new developments to make contributions towards not only improvements public transport infrastructure such as station improvements and stabling facilities for buses, but also enhanced bus services.

A. This policy fails to acknowledge that CrossRail 2 has in effect been cancelled, or that the Northern Line Extension has actually opened.

B.1. This policy fails to acknowledge that faulty planning decisions in the past mean that the Thames Path in several parts of the borough is not six metres wide. The requirement that riverside walks should where possible allow for provision of cycling, ensuring pedestrian safety needs modification. Where cycling is allowed it should be within managed space rather than a free-for-all of shared space.

C. This policy fails to acknowledge the noise pollution associated with the heliport, and it is thus in tension with the environmental objective set in Chapter 2 that measures should be taken to reduce or mitigate such pollution.

D. 2 The requirement that minicab offices will be allowed only where “at any time” parking restrictions are in place will be effective only if it is properly enforced. Practical action is needed to avoid the environmental harm and street congestion caused by private hire and delivery vehicles awaiting calls.

Chapter 21 Green and Blue Infrastructure

This chapter is unsatisfactory since it fails to take account of the policies and requirements of the London Plan. Important issues such as geodiversity and the requirement to undertake an open space needs assessment are not even mentioned.

LP53 Protection and Enhancement of Green and Blue Infrastructure

It is unsatisfactory that the promised Open Space Strategy which would, as stated in the Pre-Publication version (paragraph 21.8), ‘provide details as to how open spaces in Wandsworth can be enhanced and made more accessible’, has been dropped. Neither the [Open Space Study and Report](#) (which have now been added to the Evidence Base), nor the policies set out here constitute a strategy. This is especially regrettable since the Infrastructure Delivery Plan (IDP) acknowledges that Wandsworth falls far short of Field in Trust (FiT) Guidelines on amounts of Natural and Semi-Natural, and Amenity Greenspace, and that several wards fall short of the Guidelines for Parks and Gardens.

LP54 Open Space, Sport and Recreation

The Policy relies for its evidence base on the [Playing Pitch Strategy](#), which dates from 2013 and has not been updated. But the IDP makes clear that provision for sport and recreation is deficient across the borough, and that in many cases what is provided is unsatisfactory in quality and poorly maintained. Nothing is said either here or in the IDP as to how those deficiencies are to be addressed.

21.25. This paragraph simply repeats what is said in 21.13 with a few additions. One of the paragraphs should be deleted.

LP55 Biodiversity

This policy fails to mention Policy G6 in the London Plan and its requirements for actions on deficiencies in access to nature. And while we recognise that the Environment Act did not receive the Royal Assent until November 2021, the provisions relating to Biodiversity Net Gain have been known for a considerable time. It is disappointing that steps have not been made in preparation.

LP 56 Tree Management and Landscaping

Neither the policy nor the succeeding paragraphs refer to London Plan Policy G7, or to the requirement for the use of a recognised tree valuation method such as CAVAT145 or i-Tree Eco. We share the view of Wandsworth Tree Wardens that the report on trees issued last autumn was neither a policy nor a strategy.

LP 58 and 59 River Corridors; and Riverside Uses, including River-dependent, River-related and River Adjacent Uses

It is unacceptable that there is no attempt in either of these policies to cross-reference to the policies set in the London Plan; nor is there even any attempt to cross-refer to the Area Strategy for Wandsworth's Riverside.

Chapter 22: Implementation, Delivery and Monitoring

The policies set out in this chapter are unsatisfactory because they are far too thin to meet the claim in paragraph 22.1 that it provides 'an overview of the ways the Council will deliver and monitor the delivery and of the Local Plan's vision, objectives, area strategies and policies'. Our concerns on this are heightened by our long experience of how many developments have been approved in direct contravention of the policies set out in previous Plans.

It is unsatisfactory also that the chapter has been padded out with paragraphs, such as 22.3, 22.16 and 22.17, that have nothing of relevance to say about either implementation, or delivery, or monitoring. They should be deleted.

22.5. The statement here that the 'community and voluntary sector will have a key role to play' is meaningless unless it states how they will be involved and engaged. The same applies to the statement in 22.13 about community involvement.

22.9. The claim here that the London Plan includes proposals to increase capacity on SouthWest Rail routes is misleading. No such scheme is included in the London Plan's list of transport schemes at Table 10.1. It is true that Network Rail's South West Main Line Strategic Study notes the constraints around Queenstown Road and the potential for increasing capacity and resilience there; and that a further phase of its Wessex Suburban Strategic Study which will focus on the inner part of the suburban network. But no specific proposals have been developed.

22.13. It is clearly correct that the site allocations in the area strategies are the key mechanism for delivery of the Plan as a whole; and that it is therefore crucial that landowners and developers engage with the Council as soon as possible. But as we have noted our comments on the area strategies, several of the site allocations are long-lived, and have featured in previous Plans, with no progress in their development. It is therefore unsatisfactory that the Plan makes no proposals as to how landowners and developers might be persuaded to engage with the Council in order to expedite proposals for development in accordance with the Plan.

LP61. Monitoring the Local Plan

The monitoring arrangements outlined here are far too non-specific to be satisfactory. Precisely what will be monitored, and with what frequency, is not made clear. A monitoring framework is mentioned, but its nature and what it will cover are not specified. Similarly, there is no clarity as to what will be covered in the Council's Annual Monitoring Report (delivery of which has often been delayed in the past). The monitoring arrangements specified in the Plan must make clear that delivery of the goals, aims and objectives set out in Chapter 2 will be regularly monitored, and on what timescale; and that compliance with the policies and objectives set out in the rest of the Plan will be monitored similarly. Otherwise, neither the Council nor Wandsworth's residents will be able to judge whether the Plan is being delivered, if it is indeed sound, or whether amendments are needed.

From: Battersea Society: Planning@batterseasociety.org.uk

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