

Wandsworth Society

17 March 2023

The Planning Inspectorate
c/o Banks Solutions
80 Lavinia Way,
West Sussex, BN16 1DD

Wandsworth Borough Council
London SW18 2PT

Wandsworth Planning Policy
Wandsworth Town Hall

For the attention of Mr Jameson Bridgewater and Mr Graham Wyatt

Dear Sirs

Consultation on the Wandsworth Local Plan Main Modifications and Policy Map Changes

We have reviewed the list of proposed Main Modifications and Policy Map Changes that you are proposing following Wandsworth Local Plan consultation.

We set out below our comments and observations on the published material which we trust you will consider when reviewing the proposed changes.

Main Modification Number	Comment
MM3	<p>Object – The word “will” should be replaced by “should” to read: “The small sites provision across the entire Plan period will should account for a minimum of 414 new homes”. However, we are also concerned by the figure of 414 that should at least be no more than an aspiration, as there is no current evidence to justify this exact figure.</p>
MM7	<p>Support – We agree that the criteria is creating confusion with Policy A5 which is much more precise and as such should be the reference.</p>
MM10	<p>Object- Adding “should” undermines the wording of the rule and in our view is actually not providing greater clarity. On the contrary, the wording in LP4 D is stronger: “The height of tall buildings will be required to step down towards the edges of the zone as indicated on the relevant tall building map unless it can be clearly demonstrated that this would not result in any adverse impacts”.</p> <p>We suggest “The height of developments within that zone should not exceed the heights of, and <u>must</u> be in accordance with the requirements as stated in policy LP4 D”</p>

<p>MM11 + MM13 +</p> <p>MM18 +</p> <p>MM22 +</p> <p>MM26 to MM32</p>	<p>Comment – Replacing <i>must</i> by <i>should</i> is aligning with the wording of policy LP4 D indeed.</p> <p>But the problem here is not that wording to be changed, but the wording of LP4 D that should be changed. The current wording makes the policy rules LP4 open to be dismissed at will to approve applications in breach of the spirit of the policy. LP4 D should say: “Proposals for tall buildings should <u>must</u> not exceed the appropriate height range identified for each of the tall building zones”.</p>
<p>MM12</p>	<p>Comment – Total support for the additions to the paragraph as it creates more precise obligations.</p> <p>However, it should be added: “<u>Development proposals must adhere to the existing Masterplan</u>”, as otherwise it encourages applicants to ignore the existing policies expressed in the Masterplan.</p>
<p>MM19</p>	<p>Objection – The word proposed should be remove (proposal for a proposed?) and it should read: “Proposals should allow for a connection to a new pedestrian/ cyclist crossing ...”</p>
<p>MM23</p>	<p>Objection – If there is an extension to the south-east to consider it as a safeguarded area, there should be no exception.</p>
<p>MM24</p>	<p>Support – see comment MM23</p>
<p>MM25</p>	<p>Support – It won’t just be designated.</p>
<p>MM92</p>	<p>Support – It is indeed uncertain whether the Masterplan will be progressed in its current form. Especially as the party controlling the Council has changed in the last local election and priorities might be different.</p>
<p>MM93</p>	<p>Comment – The wording needs to be more precise and it should read: “ <i>Development by condition may need to <u>must</u> improve York Road ”</i></p>
<p>MM146</p>	<p>Objection – The wording undermines the integrity of the tall building policy making it as an aspiration from the Council instead of a proper directive. It should be kept as originally written.</p>

MM184	Support – We are pleased to see more restrictive criteria in Wandsworth Local Plan.
MM207	Comment – We are pleased to see a policy seeking to provide sufficient space for industrial usage. However, we would like the policy to clearly state that the aim is to resist further release of industrial land for residential purposes.
MM232	Object – The removal of LP4 D would conflict with LP46 A (MM230) and therefore should be kept for consistency.
MM242	Support
MM247 + MM248	Support
MM249	Support – More guidance is always preferable.

If we can provide any further information, please contact the author

Yours faithfully,

Philip Whyte

Chair Wandsworth Society

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