



WANDSWORTH LOCAL PLAN (Regulation 19)
A submission by Wandle Valley Forum to London Borough of Wandsworth

February 2022

1. Wandle Valley Forum provides support and an independent voice for over 140 community groups, voluntary organisations and local businesses and for everyone who shares a passion for the Wandle. Many of our supporters are based in Wandsworth.
2. Wandsworth takes its very name from the Wandle and includes an important part of the Wandle Valley Regional Park and a significant length of the River Wandle, including its mouth in the Wandle Delta. The Wandle Valley is a major strategic environmental and heritage asset for the Borough and the site of major industrial estates and much employment. The network of Wandle-related open spaces and the Wandle Trail are especially important for the quality of life in Wandsworth and provide an economic opportunity drawing on the area's environmental quality. It also provides the means to connect important areas of the Borough, including Wandsworth Town Centre and the Thames, and to support active travel and mental wellbeing.
3. We have established our priorities for the Wandle Valley in the [Wandle Valley Forum Charter](#). This is grounded in the views of community groups, voluntary organisations and local businesses that support us. It sets out a number of issues to be addressed through development plans in the Wandle Valley, including Wandsworth's Local Plan.

Overall approach

4. There is much to welcome in the Local Plan and its treatment of the Wandle Valley. We particularly welcome explicit recognition of the Wandle Valley in the Wandle Valley Area Strategy and Wandsworth Town Area Strategy but more needs to be done to make the Wandle more of a centrepiece of the new Wandsworth Local Plan. The strategic opportunity provided by the Wandle is addressed in only a limited way by the Plan's lengthy Vision to 2038 and mainly through its economic role. It is worryingly absent from the Plan's environmental, social and economic objectives and the river is not included in the Key Diagram. For the reasons provided in these representations we do not consider the Wandsworth Local Plan to be sound.
5. We raised a significant number of issues and opportunities for strengthening treatment of the Wandle Valley in representations on the earlier draft Local Plan. It is disappointing that so few have been taken on board. It is also of concern that our representations went unacknowledged and were absent from the summary of representations and Statement of Consultation when the revised Plan was published. This was rectified when we raised the issue but this also demonstrated the very limited way in which our representations have been considered.

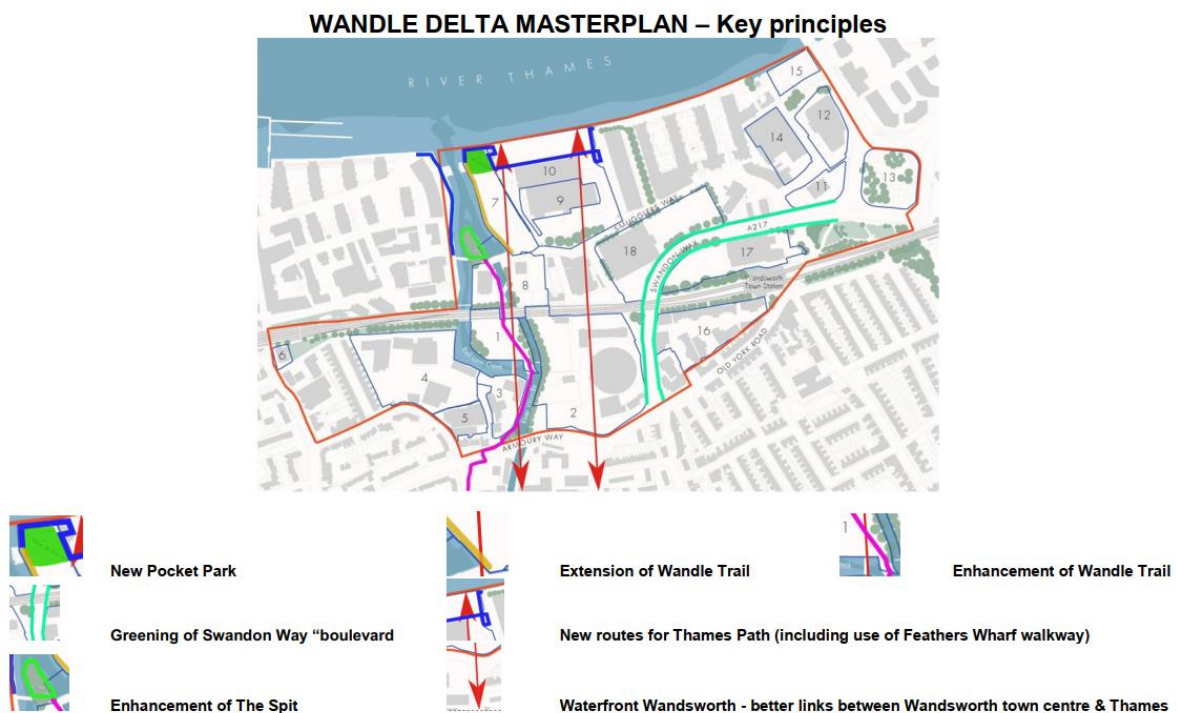
6. It appears to be Wandsworth Council's view that the Wandle is adequately addressed in the Plan, its Area Strategies and the Wandle Delta Masterplan. This attention is welcome but we believe the rest of the Wandle should also be the focus of its own Masterplan and this will support delivery of Area Strategy PM10 Wandle Valley. This Masterplan should be identified in Policy SDS1.

7. The Plan also needs to contribute to a consistent approach in Merton, Sutton and Croydon which share the Wandle. This requires a mechanism to ensure wider co-operation with neighbouring local planning authorities.

Area Strategy – Wandsworth Town

8. We welcome recognition of the central contribution played by the Wandle in defining the character and identity of this part of the Borough and the contribution it can play in building physical and other connections that support the vitality and viability of Wandsworth Town Centre. We agree with the view that *"its potential remains underutilised"* (paragraph 4.14).

9. We have identified the following principles as part of the masterplanning process for the Wandle Delta and note that in the outcome of public engagement over the Masterplan the *"most frequently made comment was to deliver the Wandle Trail"* (paragraph 1.5.5).



The Masterplan should also be guided by the [Wandle Valley Forum Charter](#) setting out the Wandle community's priorities for the future of the Wandle Valley.

10. Our principles and this support could be more emphatically supported in Policy PM2. We recognise and welcome Policy PM2's statement that *"the Council will require the creation of pocket and linear parks and more natural green spaces focused along the River Wandle and Bell Lane Creek. These should support nature through encouraging biodiversity and providing appropriate habitat, as well as making animated riverside spaces which encourage users to dwell"* but this could go further. For example, just as *"development proposals should demonstrate how the opportunities provided by the Wandsworth Gyratory proposals have been maximised in terms of enhancing connectivity"* so they should demonstrate how they have taken opportunities to extend and enhance the Wandle Trail.

These should not be left only to Wandsworth Council to support. There should also be specific policy support for a “*parklet*” on the east bank of the Wandle where it meets the Thames to re-enforce its inclusion in Map 4.1 for Wandsworth Town Centre. Both the Policy and the Key Diagram should also explicitly reference the need to enhance The Spit.

11. We support the intentions in site allocations WT2, WT3, WT4, WT5, WT6 and WT7 for the Wandle, improvements to the river channel and new access to, along and across it. Site allocation WT10 should prioritise strengthening the relationship of the Switch House to the Wandle’s historic and wildlife value. We warmly welcome the expectation set in site allocation WT9 for extension of the Wandle Trail to the confluence with the Thames and for this to incorporate a “*generous open space*”. We also welcome the expectation of creating new public routes to the high level bridge for the riverside walk (also included in site allocation WT11). The Plan repeats the previously highlighted error in paragraph 4.94 of locating this to the west and not the east of the Wandle. The provisions for extending the Wandle Trail and providing a public route to the high level bridge should not be mutually dependent and be capable of being advanced independently of each other. We support the expectation of significant tree planting along Swandon Way in site allocations WT12 and WT13.

12. It is essential that all new and existing routes along and across the river are designed and surfaced to minimise conflict between different users, especially between those on bike and on foot. This also needs to be addressed in Policy LP52 B and be supported by similar text to that supporting a riverside walk along the Thames (paragraph 20.41). We commend the pedestrian priority and approach developed for towpaths by the [Canal and River Trust](#).

13. Site allocation WT20 references the relationship between Southside Shopping Centre and the Wandle and this could be significantly strengthened. Currently the river runs for c400m beneath the existing building and this is the longest covered stretch along its course. There are opportunities to daylight the Wandle as part of any redevelopment and for the presence of the river to lead the design of any new scheme. We ask that this is addressed more assertively than “*opportunities should be explored*” (paragraph 4.159) in a revised site allocation which explicitly promotes daylighting of the Wandle. This would be consistent with London Plan Policy SI 17.

14. Although physically located in Hammersmith and Fulham the Wandle Vista of the Wandle Delta should be recognised in the Area Strategy. The Vista is not addressed in paragraph 4.14 or in Policy PM2 which is limited to views in Wandsworth’s Urban Design Study (2020) (PM2 A 6.) or Policy PM9 relating to Wandsworth’s Riverside. Nor is it included in Map 4.1 of Wandsworth Town or Map 11.1 of Wandsworth’s Riverside although this does include a similar vista looking south across Wandsworth Bridge. There is a strong evidence base supporting identification of this Wandle Vista from the [Wandle Vistas](#) report prepared for Wandle Valley Regional Park Trust and Wandle Valley Forum with funding from the Living Wandle Landscape Partnership. This work has been recognised with the RTPI’s Excellence in Plan Making Practice award and the Landscape Institute’s Award for Landscape Policy and Research.



Area Strategy – Wandle Valley

15. We welcome inclusion of an Area Strategy directly addressing the Wandle Valley and recognising its value as a strategic resource. We warmly welcome the commitment to complete the Missing Link in the Wandle Trail at Earlsfield which complements Merton's Local Plan Projects on the borough boundary.

16. We believe Policy PM10 can be strengthened by:

- Strengthening the Placemaking role of new development to require it to deliver a net gain in biodiversity – this is consistent with the enhancement expectation of Policy LP55 – and to support improvements to the quality and quantity of open space not just avoid a reduction
- Addressing the need for work on the Wandle to contribute to naturalising the way it functions, as supported by London Plan Policy SI17 and the Wandle Catchment Management Plan
- Requiring pedestrian priority in any plans for improving permeability and access along and across the river for active travel
- Recognising the role of both Wandle Valley Forum and Wandle Trust (SE Rivers Trust) as well as Wandle Valley Regional Park Trust in supporting and delivering change and providing partnership – both these organisations are currently more actively engaged on the Wandle than the Regional Park Trust
- Recognising in the historic significance of the Wandle itself and its related weirs and other structures in the river whose heritage value should be considered when determining planning applications for their alteration or removal
- Requiring development to create more opportunities for local people to manage and run buildings and open spaces along the Wandle

17. We believe the Area Framework needs to be supported by:

- A Masterplan for the Wandle Valley to support delivery of the Area Strategy in the same way as is being provided for Wandsworth Town
- Acknowledging the complementary priority to be attached to delivery of the Wandle Valley's Catchment Management Plan
- Addressing the relationship with the All London Green Grid within the policy and not only the supporting text, consistent with the approach in Policy PM9 A 8.
- Identifying the area of Wandle Valley Regional Park, including showing it in the Policies Map as is done for both Merton and Sutton's Local Plans, and echoing Merton's Local Plan policy (CS5 (adopted Local Plan) and O8.7 (draft Local Plan)) for a 400m buffer zone



*Boundary of Wandle Valley Regional Park
in All London Green Grid*

Neighbourhood plans

18. Fewer than one third of the Plan's policies are defined as "*strategic*" demonstrating the considerable scope for detailed planning policies to be more community-led and delivered through neighbourhood plans. We are supportive of efforts to strengthen neighbourhood planning in the Wandle Valley, drawing on the early experience in Tooting Bec and Broadway and further upstream in Hackbridge and Beddington Corner which has a completed neighbourhood plan. This will require stronger support from Wandsworth Council to be realised.

19. We look forward to being kept involved in the Plan's progress.